

One Horton Heath

Quobleigh Breach

Information to inform a Habitats Regulations Assessment (HRA) and Appropriate Assessment

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Eastleigh Borough Council

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1 INTRODUCTION

1.1 THE PROPOSED DEVELOPMENT

An application is being submitted to Eastleigh Borough Council for the approval of reserved matters (appearance, layout, scale and landscaping) for the development of 269 dwellings, associated open space, landscaping, parking and other associated works, pursuant to outline permission O/20/89498 at Quobleigh Breach. This proposal affects a Public Right of Way (PRoW). An Environmental Impact Assessment and shadow Appropriate Assessment was submitted as part of the outline application.

The location of the Quobleigh Breach site is shown in Figure 1.

1.1.1 Outline Planning Permission

The Outline Planning Permission (OPP) reference O/20/89498 is associated with the wider One Horton Heath Development. The OPP area is shown in Figure 2, along with the location of the Quobleigh Breach site in the context of the wider development.

1.1.2 Associated Link Road

A full planning application for a 1.2-mile link road within OHH to provide a connection into Burnetts Lane roundabout to the south and to the Allington Lane roundabout to the north (creating the southern and northern access routes into the wider OHH site) was granted under planning permission F/21/91185.

1.2 RELATED DOCUMENTS AND PLANS

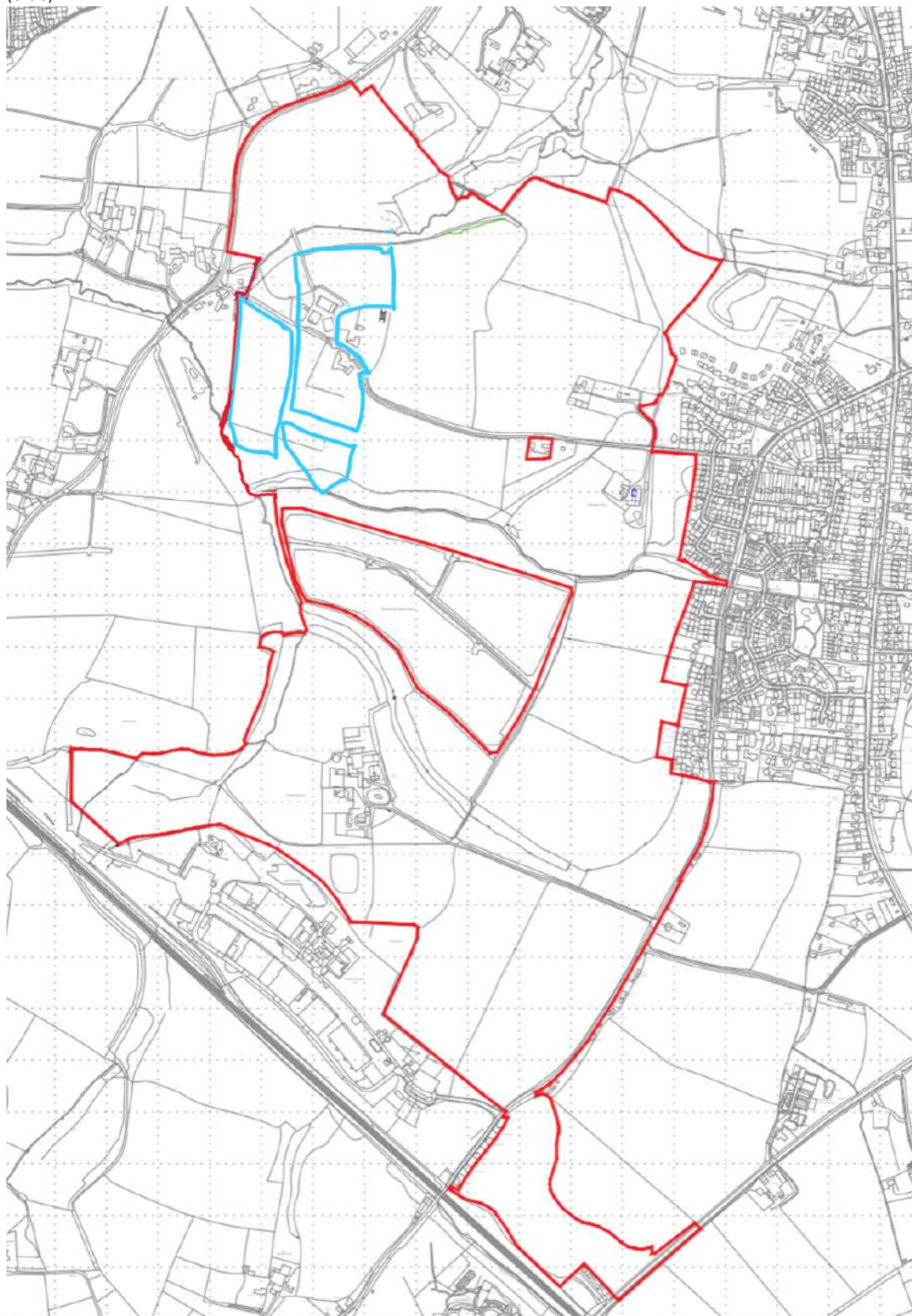
This document draws on material contained in the following reports, plans and drawings, which form part of the planning submission for the Reserved Matters (RM) application at Quobleigh Breach:

- Ecological Impact Assessment (Johns Associates Ltd, October 2025)
- Nutrient Neutrality Study One Horton Heath: Quobleigh Breach (Hilson Moran Ltd, 23 October 2025 37245-HML-XX-XX-RP-U-870002, Issue P01)
- Draft Drainage Strategy – Quobleigh Breach Parcel of Development, One Horton Heath, Hampshire (Motion, 17 October 2025).

Figure 1: Location and Context of Quobleigh Breach



Figure 2: One Horton Heath Outline Planning Application area (red) showing the approximate location of Quobleigh Breach (blue)



2 HRA PROCESS

Special Protection Areas (SPA) and Special Areas of Conservation (SAC) are internationally important nature conservation sites, designated respectively for birds and for habitats and species. They receive statutory protection under the Conservation and Species Regulations 2019 (EU exit) (as amended), which transpose the requirements of the European Directives on the Conservation of Wild Birds (2009/147/EC, the 'Birds Directive') and the Conservation of Natural Habitats and of Wild Fauna and Flora (42/43/EEC, the 'Habitats Directive') into English legislation. SPAs and SACs are jointly called 'European sites' and are part of The National Site Network (previously known as 'Natura 2000 sites'). Under recent changes to the National Planning Policy Framework (NPPF, December 2024), Ramsar wetland sites are now afforded the same legal protection as European sites.

Articles 6(3) and 6(4) of the Habitats Directive set out the decision-making tests for plans and projects affecting European sites. Article 6(3) establishes the requirement for appropriate assessment:

6(3) Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.

Article 6(4) goes on to discuss alternative solutions, the test of 'imperative reasons of overriding public interest' (IROPI) and compensatory measures:

6(4) If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.

In turn, these two articles are typically split into four stages, with the results of each stage influencing whether further stages are required:

1. Screening: determining whether the plan or project is likely to have an adverse effect on the integrity of a European site, with the concept of 'integrity' being related to the European site's conservation objectives. In turn, the conservation objectives relate to the European site's 'qualifying features', i.e. why it has been designated.
2. Appropriate Assessment: Determining whether, in view of the European site's conservation objectives, the plan or project 'in combination' with other plans and projects would have an adverse impact on the integrity of a European site.
3. Assessment of alternative solutions.
4. Imperative reasons of overriding public interest (IROPI) and compensatory measures.

Eastleigh Borough Council is the competent authority responsible for ensuring that development control decisions associated with the location and phases of the One Horton Heath development (of which Quobleigh Breach is one) do not adversely affect the integrity of European sites.

It is considered that the type and location of development proposed for One Horton Heath could, without mitigation, have a significant effect on several European sites. This report discusses the relevant European sites (Section 3); explains what impacts can be screened out from further assessment (Section 4) and then presents the Appropriate Assessment for the remaining impacts at Section 5.

3 EUROPEAN SITES

3.1 INTRODUCTION

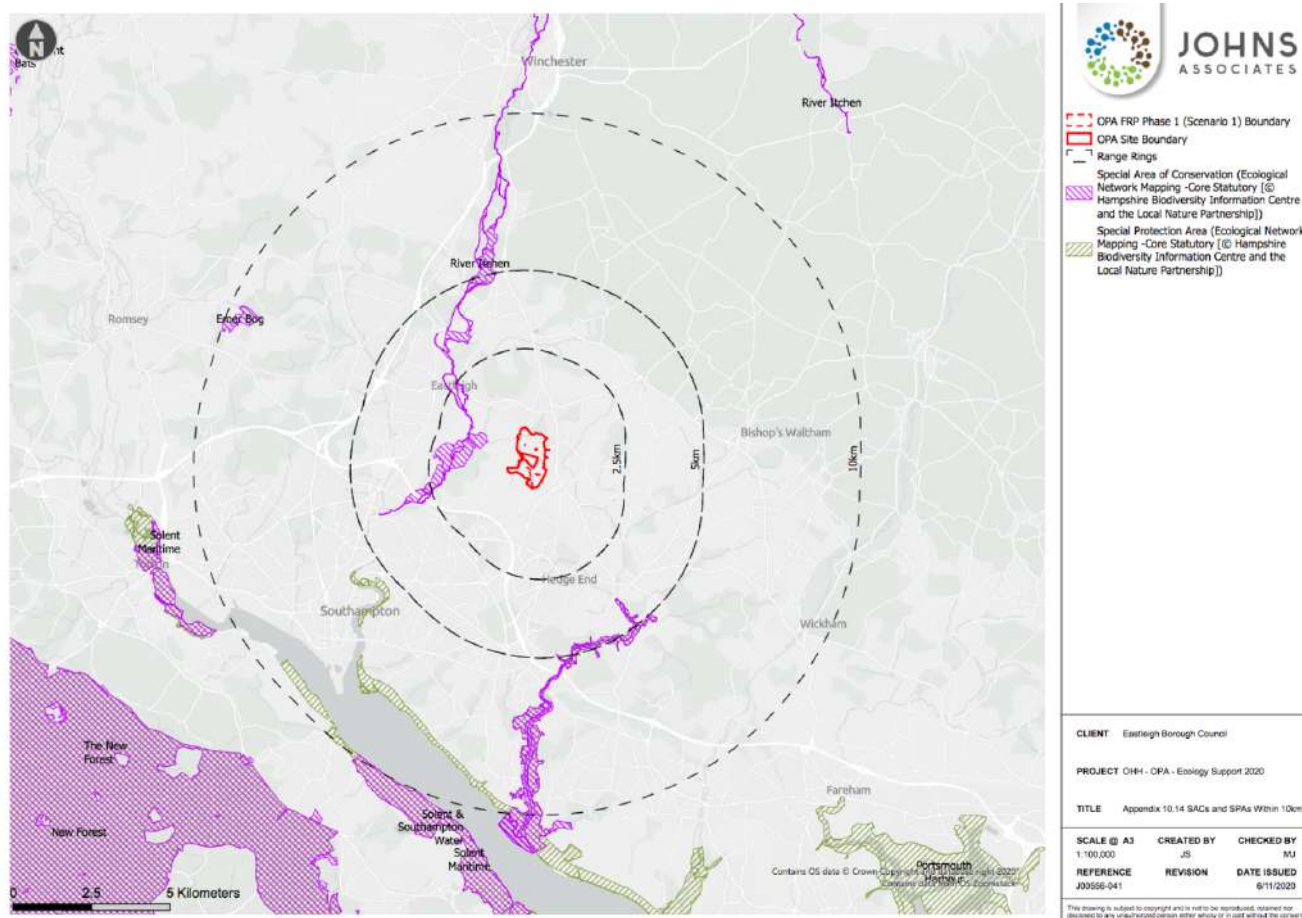
Figure 3 shows all European sites within 10km of the OPP and the Quobleigh Breach application Site. This is the standard distance used in Habitats Regulations Assessments. The sites are:

- River Itchen SAC – 980m west of Quobleigh Breach at its closest point, designated as a typical chalk river.
- Solent and Southampton Water Special Protection Area – 5.56km southeast of the Site at its closest point. This European site is designated for its estuarine bird species.
- Solent Maritime Special Area of Conservation – 5.56km southeast of the Site at its closest point, designated for its estuarine habitat and associated vegetation.
- Solent and Southampton Water Ramsar site – located 5.56km southeast of the Application Site at its closest point and designated for its wetland habitats.
- Emer Bog SAC – 9.06km northwest of Quobleigh Breach at its closest point, designated for its transition mires and quaking bogs.

Additionally, this report considers the European sites associated with the New Forest:

- New Forest SPA – 13.13km southwest of the Site across Southampton Water (29.8km via the road network). This site is designated for five key bird species it supports.
- New Forest SAC – 13.13km southwest of the Site at its closest point, designated for its waterbodies, heathland, beech and oak woodland, depressions on peat substrates, damselflies and stag beetles.
- New Forest Ramsar site – 13.13km southwest of the Site, designated for its wetland sites.

Figure 3: Distribution of European Designated Sites within 10km of the OPP



3.2 RIVER ITCHEN SAC¹ - UK0012599

The River Itchen SAC is located 980m west of Quobleigh Breach at its closest point. Figure 4 overleaf shows the location of the European site in relation to the Site.

General Site Character

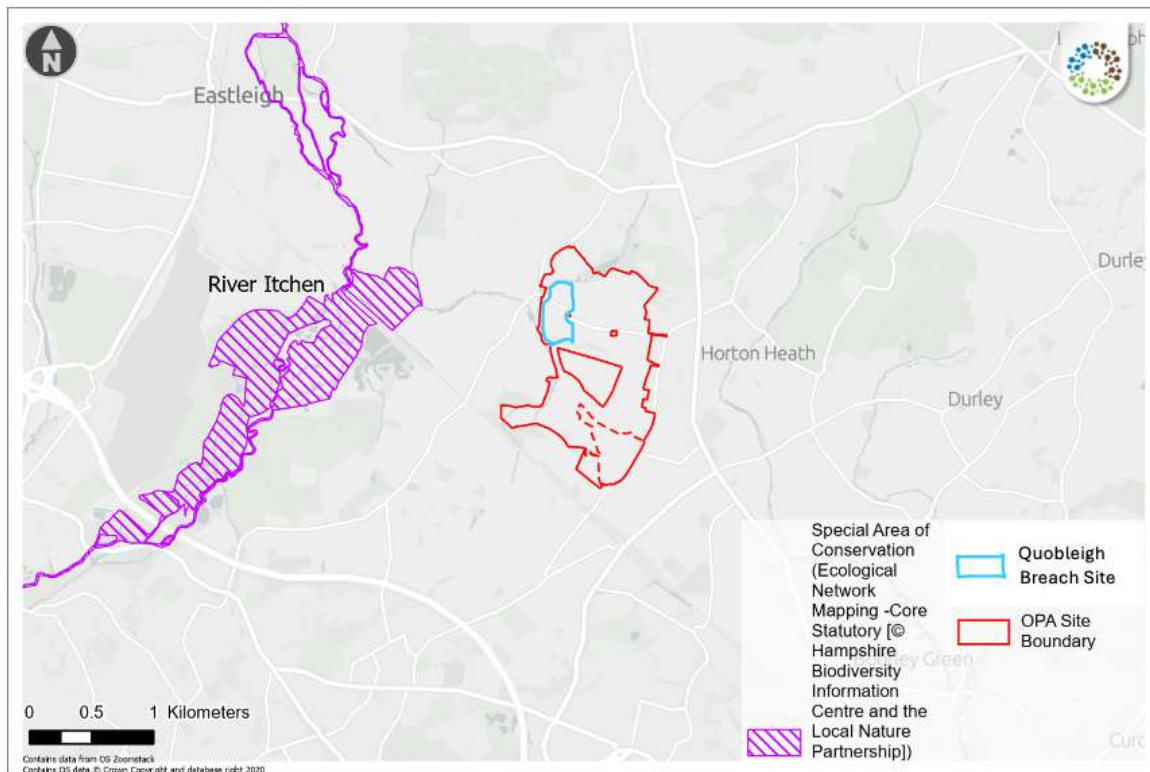
The River Avon SAC is a chalk river, covering an area of 303.98ha. Mainly spring-fed, the water is of high quality, with high dissolved oxygen and a relatively constant temperature.

- Inland water bodies (Standing water, Running water) – 40%
- Bogs, Marshes, Water fringed vegetation – 27%
- Humid grassland, Mesophile grassland – 19%
- Improved grassland – 1%
- Broad-leaved deciduous woodland – 10%
- Mixed woodland – 2%

¹ <https://sac.jncc.gov.uk/site/UK0012599>

- Non-forest areas cultivated with woody plants (including Orchards, Groves, Vineyards, Dehesas) – 1%

Figure 4: River Itchen SAC (blue line boundary indicates the Quobleigh Breach site)



Qualifying Features

The River Itchen SAC is designated for the following features:

Annex I Habitats that are a primary reason for selection of this site

- 3260 Water courses of plain to montane levels with the *Ranunculus fluitantis* and *Callitriche-Batrachion* vegetation

The Itchen is a classic example of a sub-type 1 chalk river. The river is dominated throughout by aquatic *Ranunculus* spp. The headwaters contain pond water-crowfoot *R. peltatus*, while two *Ranunculus* species occur further downstream: stream water-crowfoot *R. penicillatus* ssp. *Pseudofluitans* a species especially characteristic of calcium-rich rivers, and river water-crowfoot *R. fluitans*.

Annex II Species that are a primary reason for selection of this site

- 1044 Southern damselfly *Coenagrion mercurial*

Strong populations of southern damselfly occur in the River Itchen SAC, estimated to be in the hundreds of individuals. The site in central southern England represents one of the major population centres in the UK. It also represents a population in a managed chalk-river flood plain, an unusual habitat for this species in the UK, rather than on heathland.

- 1163 Bullhead *Cottus gobio*

The R. Itchen supports high densities of bullhead throughout much of its length. The river provides good water

quality, extensive beds of submerged plants that act as a refuge for the species, and coarse sediments that are vital for spawning and juvenile development.

Annex II species present as a qualifying feature, but not a primary reason for site selection

- 1092 White-clawed (or Atlantic stream) crayfish *Austropotamobius pallipes*
- 1096 Brook lamprey *Lampetra planeri*
- 1106 Atlantic salmon *Salmo salar*
- 1355 Otter *Lutra lutra*

The Standard Data Form for the River Itchen SAC states that the Annex I habitat is in excellent condition in terms of representativity, conservation and global overview. The southern damselfly feature is in excellent condition, and the bullhead feature is in good global grade.

Threats, pressures and activities within impacts on the R. Itchen SAC

The most important negative impacts and activities with a high effect on the SAC are:

- A04 – Grazing inside the SAC
- H02 – Pollution to groundwater (point sources and diffuse sources) both inside and outside the SAC
- J02 – Human induced changes in hydraulic conditions both inside and outside the SAC

Most of the SSSI units that comprise the River Itchen SAC near Quobleigh Breach are in 'unfavourable recovering' condition. The main reasons for this are historic channel modifications and a predominantly unnatural physical structure.² There is evidence of pressure from nutrient enrichment and localised sedimentation. None of the survey sites achieved high ecological status, although most were recorded as good status.³

3.3 SOLENT AND SOUTHAMPTON WATER SPA⁴ - UK9011061

At its closest point, the Solent and Southampton Water SPA is situated approximately 5.56km southeast of Quobleigh Breach (see Figure 5).

General Site Character

Covering an area of 5,401.12ha, more than 90,000 wading birds use the Solent annually to feed and roost. Besides using the mudflats and grazing marshes to feed, they also rely on farmland with cereals and pasture, and amenity grasslands outside the SPA boundary.

- Shingle, Sea cliffs, Islets – 10.2%
- Broad-leaved deciduous woodland – 0.6%

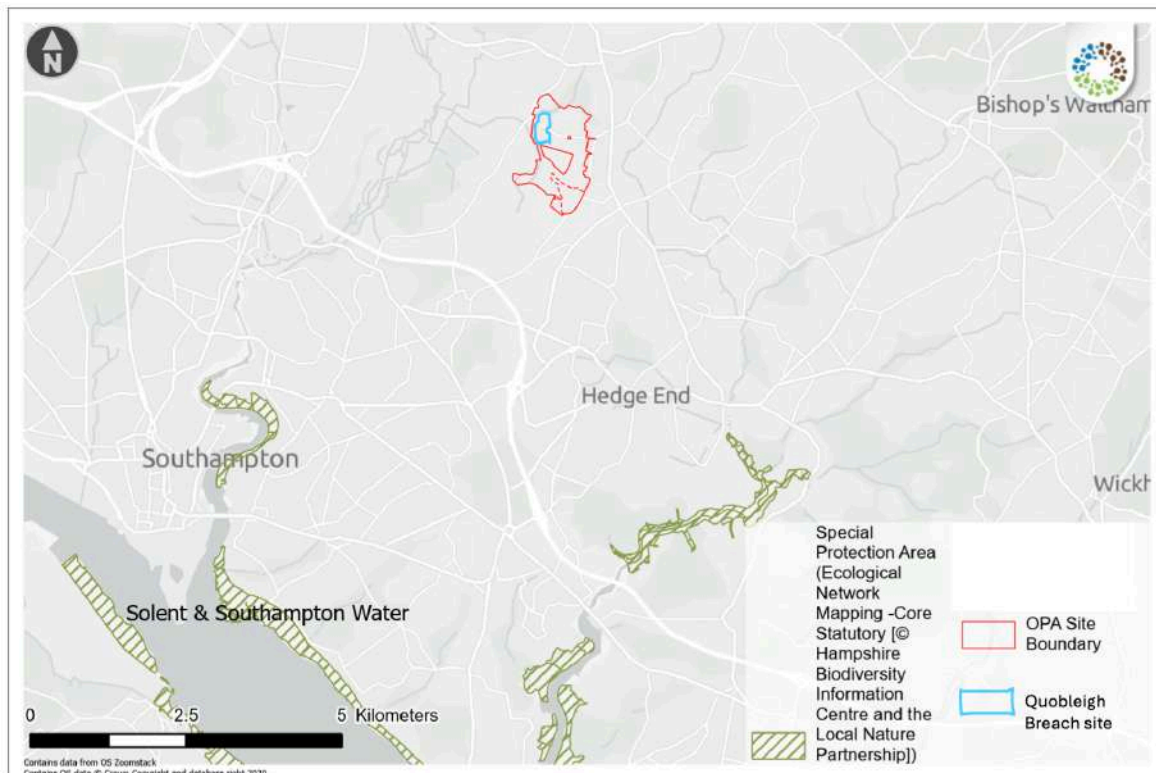
² JNCC River Itchen (2020) <https://sac.jncc.gov.uk/site/UK0012599>

³ Grieve, N. (2014) River Itchen SSSI Channel Unit Condition Assessment, <http://www.hwa.uk.com/site/wp-content/uploads/2017/12/1.-Grieve-2014-River-Itchen-SSSI-Condition-Assessment-UCL.pdf>

⁴ <https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9011061.pdf>

- Salt marshes, Salt pastures, Salt steppes – 18.2%
- Bogs, Marshes, Water fringed vegetation, Fens – 3.4%
- Coastal sand dunes, Sand beaches, Machair – 2.8%
- Humid grassland, Mesophile grassland – 17.1%
- Tidal rivers, Estuaries, Mud flats, Sand flats, Lagoons (including saltwork basins) – 47.7%

Figure 5: Solent and Southampton Water SPA (blue line boundary indicates the Quobleigh Breach site)



Qualifying Features

The Solent and Southampton Water SPA is designated for supporting the following species referred to in Article 4 of Directive 2009/147/EC and listed in Annex II of Directive 92/43/EEC:

- A052 Teal *Anas crecca* (non-breeding)
- A675 Dark-bellied Brent goose *Branta bernicula bernicula* (non-breeding)
- A137 Ringed plover *Charadrius hiaticula* (non-breeding)
- A176 Mediterranean gull *Larus melanocephalus* (breeding)
- A616 Black-tailed godwit *Limosa limosa islandica*
- A195 Little tern *Sterna albifrons* (breeding)
- A192 Roseate tern *Sterna dougallii* (breeding)

- A193 Common tern *Sterna Hirundo* (breeding)
- A191 Sandwich tern *Sterna sandvicensis* (breeding)
- Waterbird assemblage (non-breeding)

There is no global assessment of the bird populations of the SPA. All birds (with the exception of roseate tern) are part of a larger regional population; the roseate terns are isolated. The population sizes of the bird species for which the SPA is notified range from 'good' (Mediterranean gull, black-tailed godwit) to 'poor' (ringed plover, sandwich tern).

Threats, pressures and activities within impacts on the Solent and Southampton Water SPA

The most important negative impacts and activities with a high effect on the SPA are:

- G01 – Outdoor sports and leisure activities, recreational activities inside the SPA
- M01 – Changes in abiotic conditions both inside and outside the SPA
- M02 – Changes in biotic conditions both inside and outside the SPA
- F02 – Fishing and harvesting aquatic resources inside the SPA
- H02 – Pollution to groundwater (point source and diffuse source) both inside and outside the SPA

3.4 SOLENT MARITIME SAC⁵ - UK0030059

At its closest point, the Solent Maritime SAC is situated approximately 5.56km southeast of Quobleigh Breach (see Figure 6).

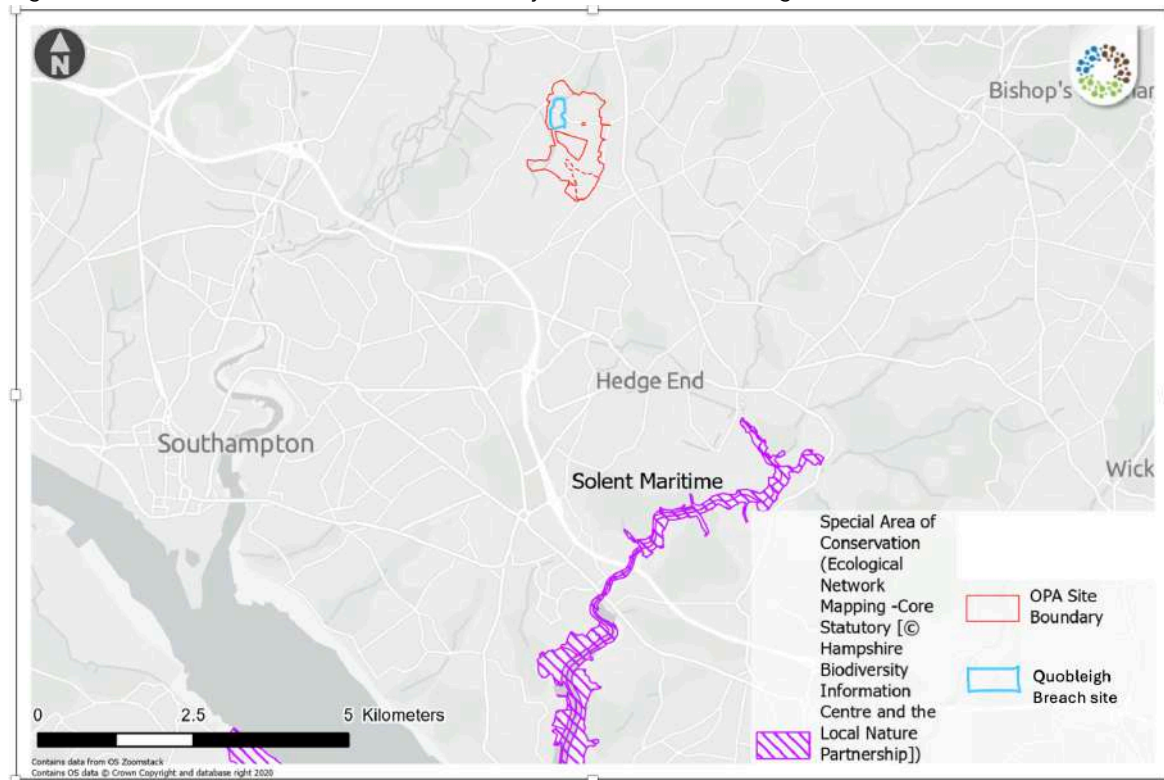
General Site Character

The Solent Maritime SAC covers an area of 11,243ha (see Figure 6) and overlaps with the Solent and Southampton Water SPA and Ramsar site. It is located in one of the only major sheltered channels in Europe, between the Isle of Wight and the mainland.

- Marine areas, Sea inlets - 14%
- Tidal rivers, Estuaries, Mud flats, Sand flats, Lagoons (including saltwork basins) – 59%
- Salt marshes, Salt pastures, Salt steppes – 23%
- Coastal sand dunes, Sand beaches, Machair – 0.5%
- Shingle, Sea cliffs, Islets – 3%
- Broad-leaved deciduous woodland – 0.5%

⁵ <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0030059.pdf>

Figure 6: Solent Maritime SAC (blue line boundary indicates the Quobleigh Breach site)



Qualifying Features

The Solent Maritime SAC is designated for the following features:

Annex I Habitats that are a primary reason for selection of this site

- 1130 Estuaries

The Solent encompasses a major estuarine system on the south coast of England with four coastal plain estuaries (Yar, Medina, King's Quay Shore, Hamble) and four bar-built estuaries (Newtown Harbour, Beaulieu, Langstone Harbour, Chichester Harbour). The Solent and its inlets are unique in Britain and Europe for their hydrographic regime of four tides each day, and for the complexity of the marine and estuarine habitats present within the area. Sediment habitats within the estuaries include extensive estuarine flats, often with intertidal areas supporting eelgrass *Zostera* spp. And green algae, sand and shingle spits, and natural shoreline transitions. The mudflats range from low and variable salinity in the upper reaches of the estuaries to very sheltered almost fully marine muds in Chichester and Langstone Harbours. Unusual features include the presence of very rare sponges in the Yar estuary and a sandy 'reef' of the polychaete *Sabellaria spinulosa* on the steep eastern side of the entrance to Chichester Harbour.

- 1320 *Spartina* swards (*Spartinion maritimae*)

Solent Maritime SAC is the only site for smooth cord-grass *Spartina alterniflora* in the UK and is one of only two sites where significant amounts of small cord-grass *S. maritima* are found. It is also one of the few remaining sites for Townsend's cord-grass *S. x townsendii* and holds extensive areas of common cord-grass *Spartina anglica*, all four taxa thus occurring here in close proximity. It has additional historical and scientific interest as the site where *S. alterniflora* was first recorded in the UK (in 1829) and where *S. x townsendii* and, later, *S. anglica* first occurred.

- 1330 Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)

The Solent contains the second largest aggregation of Atlantic salt meadows in south and southwest England. Solent Maritime is a composite site composed of a large number of separate areas of saltmarsh. In contrast to the Severn Estuary, the salt meadows at this site are notable as being representative of the ungrazed type and support a different range of communities dominated by sea-purslane *Atriplex portulacoides*, common sea-lavender *Limonium vulgare* and thrift *Armeria maritima*. As a whole, the site is less truncated by man-made features than other parts of the south coast and shows rare and unusual transitions to freshwater reedswamp and alluvial woodland as well as coastal grassland. Typical Atlantic salt meadow is still widespread in this site, despite a long history of colonization by cord-grass *Spartina* spp.

Annex I habitats present as a qualifying feature, but not a primary reason for selection of the site

- 1110 Sandbanks which are slightly covered by sea water all the time
- 1140 Mudflats and sandflats not covered by sea water at low tide
- 1150 Coastal lagoons *Priority feature
- 1210 Annual vegetation of drift lines
- 1220 Perennial vegetation of stony banks
- 1310 *Salicornia* and other annuals colonising mud and sand
- 2120 "Shifting dunes along the shoreline with *Ammophila arenaria* ('white dunes')"

Annex II species present as a qualifying feature, but not a primary reason for site selection

- 1016 Desmoulin's whorl snail *Vertigo moulinsiana*

The Standard Data Form for the site states that the estuary feature of the SAC has a global grade of 'good', comprising excellent habitat representativity and good surface and conservation status. The *Spartina* swards have a global grade of 'excellent', comprising excellent representativity and surface, but average/ reduced conservation status. The Atlantic salt meadows have 'good' status throughout.

Threats, pressures and activities within impacts on the Solent Maritime SAC

The main threats to the qualifying features of the SAC are same as those set out in Section 3.3 for the Solent and Southampton Water SPA.

3.5 SOLENT AND SOUTHAMPTON WATER RAMSAR SITE⁶ - UK11063

The Solent and Southampton Water Ramsar site covers an area of 5,346ha. Its boundary overlaps with that of the Solent Maritime SAC and the Solent and Southampton Water SPA. At its closest point, this Ramsar site is approximately 5.56km southeast of the Quobleigh Breach site (see Figure 7).

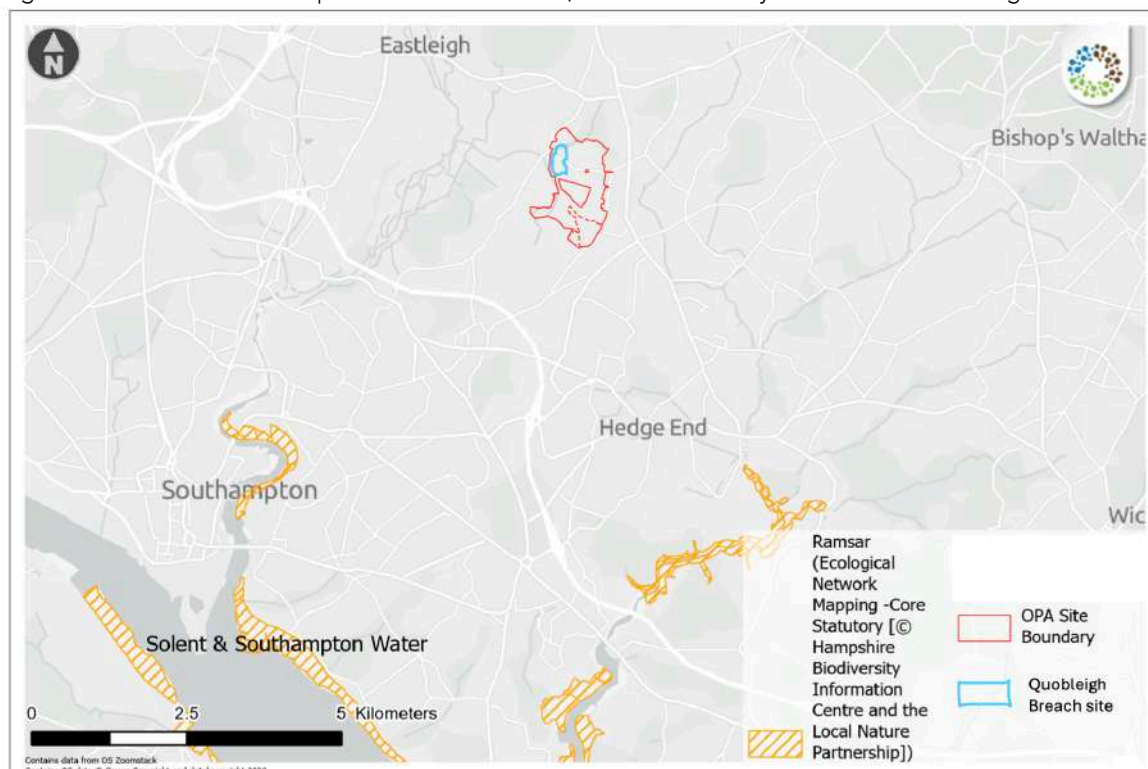
General Site Character

The Solent and Southampton Water Ramsar site extends from Hurst Spit to Gilkicker Point along the south coast of Hampshire and along the north coast of the Isle of Wight. The site comprises estuaries and adjacent coastal habitats including intertidal flats, saline lagoons, shingle beaches, saltmarsh, reedbeds, damp woodland, and grazing marsh.

⁶ <https://jncc.gov.uk/jncc-assets/RIS/UK11063.pdf>

The diversity of habitats supports internationally important numbers of wintering waterfowl, important breeding gull and tern populations and an important assemblage of rare invertebrates and plants.

Figure 7: Solent and Southampton Water Ramsar site (blue line boundary indicates the Quobleigh Breach site)



Reason for Designation

This Ramsar site was designated due to:

- It being one of the few major sheltered channels between substantial island and mainland in European waters, exhibiting an unusual strong double today flow, with long periods of slack water at high and low tides.
- It including many wetland habitats characteristic of the biogeographical region: saline lagoons, saltmarshes, estuaries, intertidal flats, shallow coastal waters, grazing marshes, reedbeds, coastal woodland and rocky boulder reefs.
- It supporting an important assemblage of rare plants and invertebrates.
- It supporting many waterfowl, including ringed plover, dark-bellied Brent goose, Eurasian teal and black-tailed godwit.

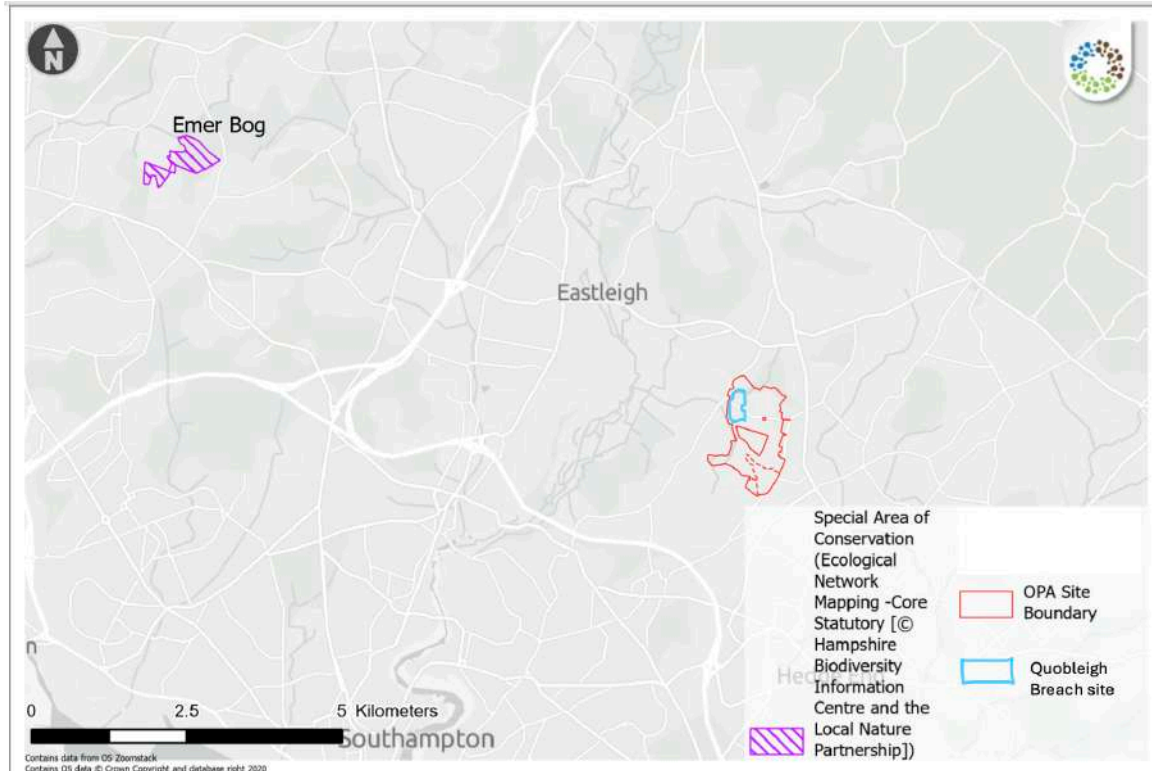
Threats, pressures and activities within impacts on the Solent and Southampton Water Ramsar site

The only factor listed as adversely affecting the ecological character of the site is erosion.

3.6 EMER BOG SAC⁷ - UK0030147

Emer Bog SAC covers an area of 36.76ha and is located approximately 9.06km northwest of Quobleigh Breach (see Figure 8).

Figure 8: Emer Bog SAC (blue line boundary indicates the Quobleigh Breach site)



General Site Character

Emer Bog comprises the following habitats:

- Bogs, Marshes, Water fringed vegetation, Fens – 16.3%
- Heath, Scrub, Maquis and Garrigue, Phygrana – 43.5%
- Broad-leaved deciduous woodland – 40.2%

Qualifying Features

Emer Bog SAC is designated for the following features:

Annex I habitats that are a primary reason for selection of this site

- 7140 Transition mires and quaking bogs

Emer Bog lies in a wet infilled hollow on the developed eastern hinterland of the New Forest. Apart from scattered willow *Salix* scrub, it is largely open and dominated by bottle sedge *Carex rostrata* and marsh cinquefoil *Potentilla*

⁷ <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0030147.pdf>

palustris, with frequent common cottongrass *Eriophorum angustifolium*, and occasional pools with bogbean *Menyanthes trifoliata*. White sedge *Carex curta* and the bog-mosses *Sphagnum fimbriatum* and *S. squarrosum* become common at the edge of the bog, with the rushes *Juncus effusus* and *J. acutiflorus*. There are also patches of common reed *Phragmites australis*. The basin is surrounded by more mature willow *Salix* woodland and open heathland.

The Standard Data Form for Emer Bog SAC states that the quality of its transition mires and quaking bogs is excellent in terms of representativity and conservation. Its conservation status is 'average or reduced' and it has global 'good' status.

Threats, pressures and activities within impacts on Emer Bog SAC

The most important negative impacts and activities with a high effect on the SAC are:

- H04 – Air pollution, air-borne pollutants both inside and outside the SAC
- G01 – Outdoor sports and leisure activities, recreational activities inside the SAC
- J02 – Human induced changes in hydraulic conditions both inside and outside the SAC

3.7 NEW FOREST SPA⁸ - UK9011031

At its closest point, the New Forest SPA is situated approximately 13.13km southwest of Quobleigh Breach (see Figure 9).

General Site Character

Covering an area of 27,968.96ha, the boundary of the New Forest SPA overlaps with the New Forest SAC, Ramsar site and the River Avon SAC. Southampton Water is situated between Quobleigh Breach and the New Forest SPA.

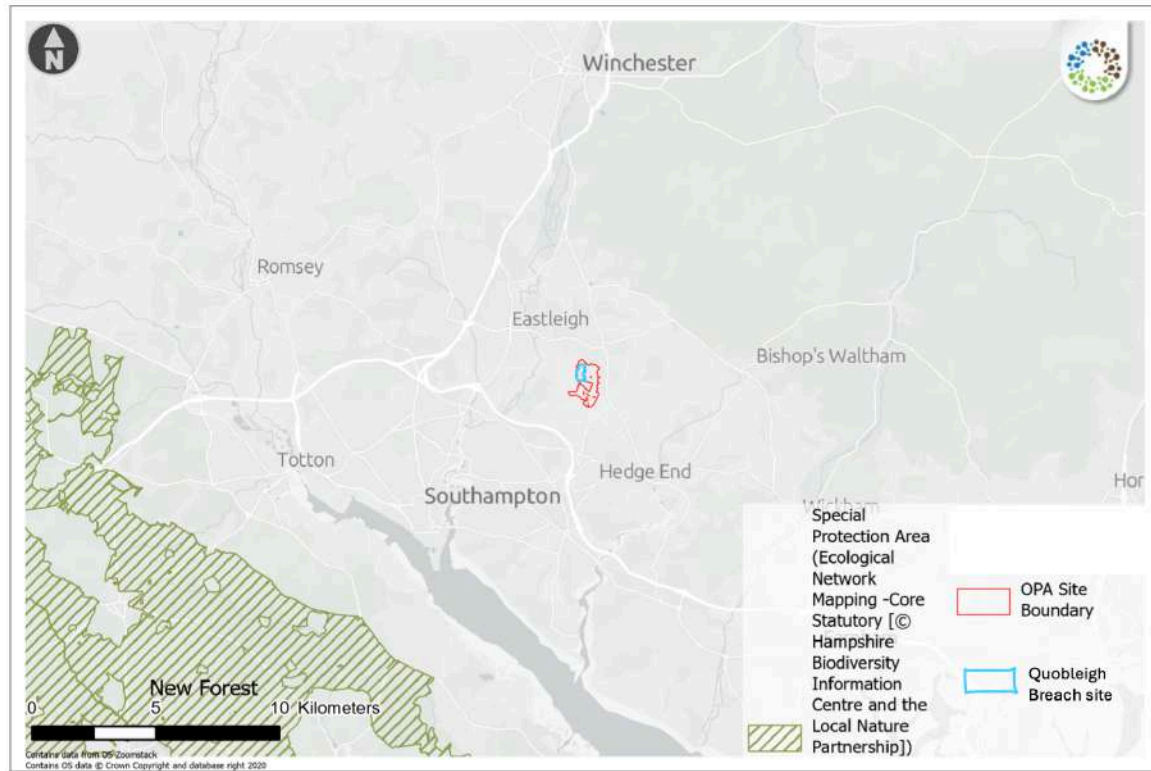
The New Forest SPA comprises the largest area of 'unsown' vegetation in lowland England and includes the representation on a large scale of habitats formerly common but now fragmented and rare in lowland western Europe. The intimate mosaic of habitats owes much to the local geology and traditional common grazing system. The following habitats are presented within the SPA. Nowhere else do these habitats occur in combination and on so large a scale.

- Dry grassland, Steppes – 17.6%
- Broad-leaved deciduous woodland – 28.9%
- Other land (including Towns, Villages, Roads, Waste places, Mines, Industrial sites) – 0.7%
- Bogs, Marshes, Water fringed vegetation, Fens – 5.9%
- Humid grassland, Mesophile grassland – 2.1%
- Heath, Scrub, Maquis and Garrigue, Phygrana – 27.3%
- Coniferous woodland – 17.3%

⁸ <https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9011031.pdf>

- Inland water bodies (Standing water, Running water) – 0.2%

Figure 9: New Forest SPA (blue line boundary indicates the Quobleigh Breach site)



Qualifying Features

The site supports an exceptionally rich bird fauna including internationally important breeding and wintering populations. The New Forest SPA is designated for its:

- A224 European nightjar *Caprimulgus europaeus*
- A082 Hen harrier *Circus cyaneus*
- A099 Eurasian hobby *Falco subbuteo*
- A246 Woodlark *Lullula arborea*
- A072 European honey buzzard *Pernis apivorus*
- A314 Wood warbler *Phylloscopus sibilatrix*
- A302 Dartford warbler *Sylvia undata*

Table 1 summarises the site assessment for each species.

Table 1: Site assessment for New Forest SPA qualifying features

Qualifying feature	Breeding status	Population	Isolation
European nightjar	Breeding	B (>2% - 15%)	Population not isolated within extended distribution range
Hen harrier	Non-breeding	C (≤ 2%)	Population not isolated within extended distribution range

Qualifying feature	Breeding status	Population	Isolation
Eurasian hobby	Breeding	B (>2% - 15%)	Population not isolated within extended distribution range
Woodlark	Breeding	A (>15% - 100%)	Population not isolated, but on margins of area of distribution
European honey buzzard	Breeding	B (>2% - 15%)	Population not isolated, but on margins of area of distribution
Wood warbler	Breeding	B (>2% - 15%)	Population not isolated within extended distribution range
Dartford warbler	Breeding	A (>15% - 100%)	Population not isolated, but on margins of area of distribution

Threats, pressures and activities within impacts on the New Forest SPA

The most important negative impacts and activities with a high effect on the SPA are:

- J02 – Human induced changes in hydraulic conditions both inside and outside the SPA
- K02 – Biocenotic evolution, succession inside the SPA
- H04 – Air pollution, air-borne pollutants both inside and outside the SPA
- F02 – Fishing and harvesting aquatic resources inside the SPA

3.8 NEW FOREST SAC⁹ - UK0012557

The New Forest SAC covers an area of 29,213.57ha and is located approximately 13.13km southwest of Quobleigh Breach (see Figure 10). Its boundary overlaps with the New Forest SPA and Ramsar site.

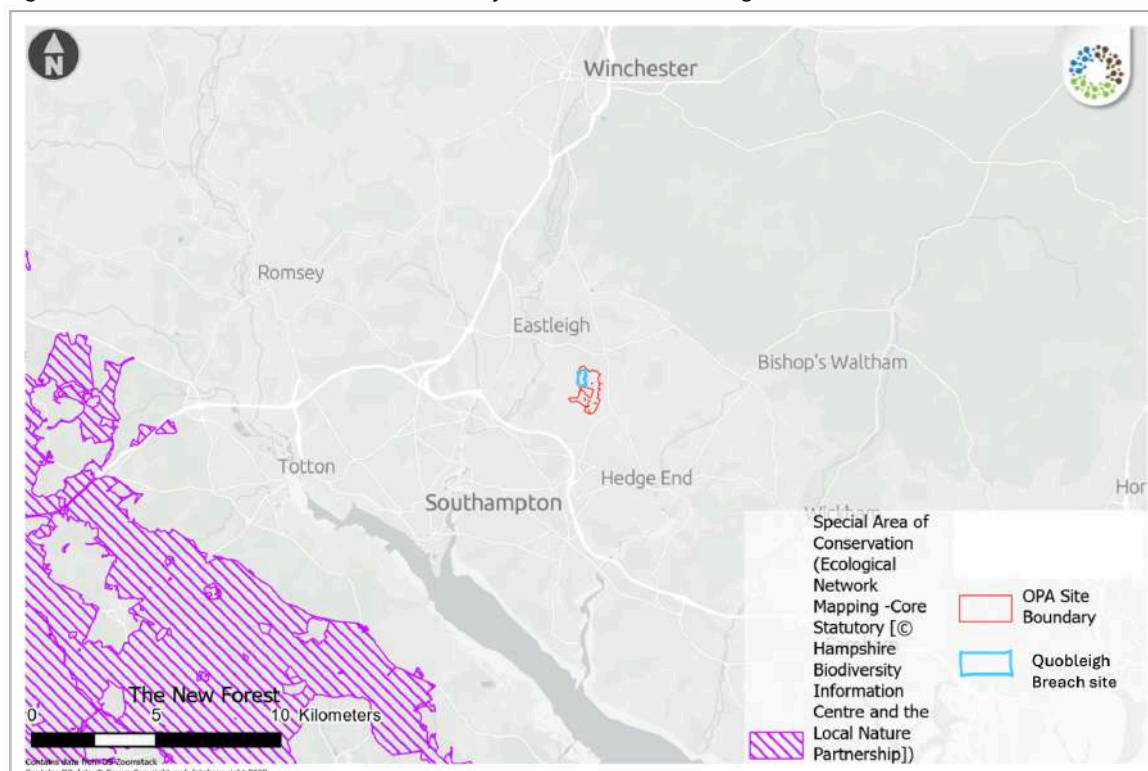
General Site Character

The New Forest SAC comprises a matrix of habitats as follows:

- Bogs, Marshes, Water fringed vegetation, Fens – 7%
- Heath, Scrub, Maquis and Garrigue, Phygrana – 34%
- Dry grassland, Steppes – 10%
- Humid grassland, Mesophile grassland – 3%
- Broad-leaved deciduous woodland – 29%
- Coniferous woodland – 17%

⁹ <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0012557.pdf>

Figure 10: New Forest SAC (blue line boundary indicates the Quobleigh Breach site)



Qualifying Features

The New Forest SAC is designated for the following features:

Annex I Habitats that are a primary reason for selection of this site

- 3110 Oligotrophic waters containing very few minerals of sandy plains (*Littorelletalia uniflorae*)
- 3130 Oligotrophic to mesotrophic standing waters with vegetation of the *Littorelletea uniflorae* and/or of the *Isoeto-Nanojuncetea*
- 4010 Northern Atlantic wet heaths with *Erica tetralix*
- 4030 European dry heaths
- 6410 *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*)
- 7150 Depressions on peat substrates of the *Rhynchosporion*
- 9120 Atlantic acidophilous beech forests with *Ilex* and sometimes also *Taxus* in the shrub layer (*Quercion robori-petreae* or *Ilici-Fagenion*)
- 9130 *Asperulo-Fagetum* beech forests
- 9190 Old acidophilous oak woods with *Quercus robur* on sandy plains
- 91D0 Bog woodland *Priority feature

- 91E0 Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (Alno-Padion, Alnion incanae, Salicion albae)
* Priority feature

Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site

- 7140 Transition mires and quaking bogs
- 7230 Alkaline fens

Annex II species that are a primary reason for selection of this site

- 1044 Southern damselfly *Coenagrion mercurial*

The New Forest is an outstanding locality for southern damselfly, with several population centres and strong populations estimated to be in the hundreds or thousands of individuals and with a long history of records. With Preseli, Dorset Heaths and the River Itchen, it represents one of the four major population centres in the UK.

- 1083 Stag beetle *Lucanus cervus*

The New Forest represents stag beetle *Lucanus cervus* in its Hampshire/Sussex population centre and is a major stronghold for the species in the UK. The forest is one of the most important sites in the UK for fauna associated with rotting wood and was identified as of potential international importance for its saproxylic invertebrate fauna by the Council of Europe (Speight 1989).

Annex II species present as a qualifying feature, but not a primary reason for site selection

- 1166 Great crested newt *Triturus cristatus*

The Standard Data Form for this European site states that all of the qualifying features in the SAC have a global grade of 'excellent' except Northern Atlantic wet heaths, *Aspero-Fagetum* beech forests and bog woodland, whose global grade is 'good'.

Threats, pressures and activities within impacts on the New Forest SAC

The most important negative impacts and activities with a high effect on the SAC are:

- B02 – Forest and Plantation management and use inside the SAC
- K02 – Biocenotic evolution, succession inside the SAC
- G01 – Outdoor sports and leisure activities, recreational activities inside the SAC
- J02 – Human induced changes in hydraulic conditions both inside and outside the SAC
- I02 – Problematic native species both inside and outside the SAC

The New Forest National Park receives over 15-million-day visits per year. It is located within easy reach of two major urban areas (Southampton and Winchester) and has permissive public access. The landowners permit a wide range of activities including traditional countryside pursuits, sporting events, golf and camping (ten campsites provide 3,300 pitches).

3.9 NEW FOREST RAMSAR SITE¹⁰ - UK11047

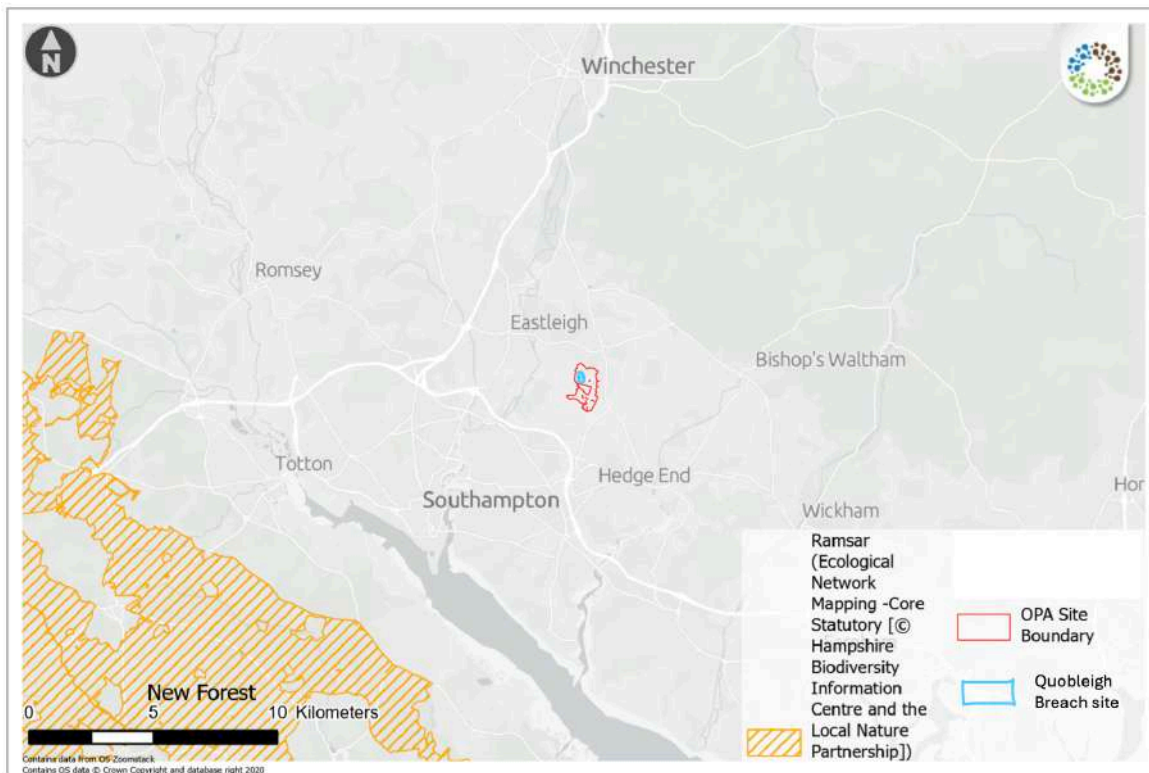
The New Forest Ramsar site covers an area of 28,003ha (see Figure 11). Its boundaries overlap with the New Forest SAC and SPA, and it is located approximately 13.13km southwest of the site at Quobleigh Breach.

General Site Character

The New Forest is an area of semi-natural vegetation including valley mires, fens and wet heath within catchments whose uncultivated and undeveloped state buffer the mires against adverse ecological change. The habitats present are of high ecological quality and diversity with undisturbed transition zones.

The suite of mires is regarded as the locus classicus of this type of mire in Britain. Other wetland habitats include numerous ponds of varying size and water chemistry including several ephemeral ponds and a network of small streams mainly acidic in character which have no lowland equivalent in the UK. The plant communities in the numerous valleys and seepage step mires show considerable variation, being affected especially by the nutrient content of groundwater. In the most nutrient-poor zones, *Sphagnum* bog-mosses, cross-leaved heath, bog asphodel, common cottongrass and similar species predominate. In more enriched conditions the communities are more fen-like.

Figure 11: New Forest Ramsar site (blue line boundary indicates the Quobleigh Breach site)



Reason for Designation

This Ramsar site was designated due to the following habitats being present:

- Valley mires and wet heaths.

¹⁰ <https://jncc.gov.uk/jncc-assets/RIS/UK11047.pdf>

- Diverse assemblage of wetland plants. Seven species of nationally rare plants are found within the Ramsar designation.
- Mire habitats with associated invertebrate fauna

Threats, pressures and activities within impacts on the New Forest Ramsar site

- Commercial scale forest exploitation
- Drainage/ land claim
- Introduction/ invasion of non-native plant species
- Recreational/ tourism disturbance

4 SCREENING

Table 2 summarises the factors that threaten the European sites presented in Section 3 of this assessment.

Table 2: European sites and factors that threaten them

Threat/ pressure \ European site	Itchen River SAC	Solent and Southampton Water SPA	Solent Maritime SAC	Solent and Southampton Water Ramsar site	Emer Bog SAC	New Forest SPA	New Forest SAC	New Forest Ramsar site
Approximate distance from the edge of One Horton Heath	0.98km	5.56km	5.56km	5.56km	9.06km	13.13km	13.13km	13.13km
Human induced changes in hydraulic conditions	A				O	R	V	
Grazing	B							
Pollution to groundwater	C	D	I					
Changes in abiotic conditions		E	J					
Changes in biotic conditions		F	K					
Fishing and harvesting of aquatic resources		G	L			S		
Outdoor sports and leisure activities/ recreation		H	M		P		W	AA
Erosion				N				
Air pollution					Q	T		
Biocenotic evolution, succession						U	X	
Problematic native species							Y	
Forest and plantation management and use							Z	BB
Drainage / land claim								CC
Introduction / invasion of non-native plant species								DD

Key:

Identified by JNCC as a threat to the European site XX Reference for discussion below

Table 3 shows the threats/ pressures to the European sites that can be screened out for the development at Quobleigh Breach.

Table 3: Impacts screened out for Quobleigh Breach

Impact screened out	Reason for screening out
B – grazing effects on the Itchen River SAC	The proposed development at Quobleigh Breach does not involve grazing and has no control over grazing within the SAC.
E, F, J, K – changes and biotic and abiotic conditions affecting the Solent and Southampton Water SPA and Solent Maritime SAC	These changes are phenomena (e.g. climate change) that are not influenced by, or within the control of, the development at Quobleigh Breach.
G, L, S – fishing and harvesting of aquatic resources affecting the Solent and Southampton Water SPA, Solent Maritime SAC and New Forest SPA	These are commercial activities not affected by the proposed development at Quobleigh Breach.
N – erosion affecting the Solent and Southampton Water Ramsar	This erosion is primarily due to sea level rise. It is being dealt with through coastal defence strategies. It is not affected by, or within the control of, the development at the Site.
O – changes to hydraulic conditions at Emer Bog SAC	Emer Bog SAC is located 9.06km from the Quobleigh Breach site, in a different catchment area. The surface water catchment of Emer Bog is restricted to a zone of about 500m around the SAC ¹¹ . The Waste Water Treatment Works (WWTs) associated with the proposals for Quobleigh Breach do not discharge near this SAC.
P - recreational impacts to Emer Bog SAC	The SAC is at minimum 14.4km from OHH by road and involves driving through the centre of Eastleigh. A visitor survey in 2011 found that the SAC has few (albeit well-used) parking spaces, which controls the number of visitors; and that it is only used by visitors from a local catchment, with no visitors from Eastleigh Borough ¹² . The SAC is small (37ha) compared with other nearer recreational areas (e.g. Itchen Country Park at 178ha). It is considered more likely that residents at Quobleigh Breach will go to other, nearer, larger recreational facilities than to this SAC.
Q – air pollution impacts to Emer Bog SAC	Emer Bog SAC is located more than 400m from an A road, and so unlikely to be significantly affected by anything other than very significant increases in traffic. The SAC is at a minimum 14.4km from OHH by road and it is necessary to drive through the centre of Eastleigh to reach it from the Site. As such, it is considered unlikely that additional traffic movements from the development will affect air quality at Emer Bog SAC.
R, V – human induced changes in hydraulic conditions at New Forest SAC and Ramsar	The New Forest lies across Southampton Water from OHH, and its hydraulic conditions are unaffected by activities/ development within the Site.
U, X, Y, Z, BB, CC, DD – impacts arising from biocenotic evolution, problematic native species, forestry management, drainage/land claim and the introduction of non-native species on the New Forest SPA, SAC and Ramsar site	These are all processes and activities which originate in or very near the New Forest and will be unaffected by the proposed development at Quobleigh Breach.

The remaining issues 'screened in' are:

- Changes in hydraulic conditions affecting the River Itchen SAC (A in Table 2);

¹¹ Eastleigh Borough Council (2015) Issues and Options Eastleigh Borough Local Plan, Habitat Regulations Assessment Screening Report, <https://www.eastleigh.gov.uk/media/1715/habitats-regulation-assessment.pdf>

¹² Nutburn Road, North Baddesley: Visitor questionnaire survey of Emer Bog and Baddesley Common, EPR; cited in Eastleigh Borough Council (2015) Issues and Options Eastleigh Borough Local Plan: Habitat Regulations Assessment Screening Report, <https://www.eastleigh.gov.uk/media/1715/habitats-regulation-assessment.pdf>

- Pollution to groundwater impacting the River Itchen SAC, Solent and Southampton Water SPA and the Solent Maritime SAC (C, D and I in Table 2). This has been extended to water pollution generally, in response to more recent legal cases¹³;
- Outdoor sports/ leisure/ recreational activities affecting the Solent and Southampton Water SPA and Solent Maritime SAC (H and M in Table 2); and
- Outdoor sports/ leisure/ recreational activities and associated air pollution affecting the New Forest SAC, SPA and Ramsar site (W, AA and T in Table 2).

These are discussed in more detail in Section 5: Appropriate Assessment.

¹³ Cases C-293-294/17 Coöperatie Mobilisation

5 APPROPRIATE ASSESSMENT

5.1 CHANGES IN HYDRAULIC CONDITIONS (RIVER ITCHEN SAC)

5.1.1 Background

Changes to water levels – hydraulic condition – can arise as a result of:

- Water abstraction from a river or from aquifers that provide the base flow for a river;
- Surface water flow to a river; and
- Flow of wastewater discharges to a river.

Water abstraction in the Hampshire area is problematic. Water to Quobleigh Breach and the wider One Horton Heath development will be provided by Southern Water, which is in an area of severe water stress¹⁴. In the Southern Water area to the east of Southampton, all water currently comes from aquifers. If too much water is abstracted from these aquifers, river levels can fall to the point where water quality decreases, which is already the case with the Rivers Itchen and Test¹⁵. This problem will be exacerbated as more water is required for new homes and businesses. By 2025, Southern Water has needed to receive a transfer of 9 million additional litres of water per day from Portsmouth Water. The water company is also planning for a desalination plant in the Solent or a water recycling scheme on the River Itchen¹⁶.

In March 2019, an inspector authorised an amendment to an Environment Agency abstraction license, allowing Southern Water to abstract more water in times of drought, pending the implementation of new reliable water supplies¹⁷. These supplies are expected to be in place by 2030. Although parts of the One Horton Heath site will be operational before the new water provision is in place, Southern Water's Water Resource Management Plan takes future housing growth into account and so covers developments such as Quobleigh Breach and the One Horton Heath proposals.

Southern Water conducted a consultation exercise on a new Hampshire Water Transfer and Water Recycling Project¹⁸ ('Water for Life') that would use advanced treatment techniques to turn highly treated wastewater, that is usually pumped far out to sea, into purified recycled water at a new water recycling plant in Havant. This purified recycled water would be pumped via an underground pipeline to the Havant Thicket Reservoir where it would mix with spring water. Water from the reservoir would then be pumped along another pipeline to its Otterbourne Water Supply Works where it would be treated to strict drinking water standards before being sent into supply. The Project is designed to optimise the use of the Havant Thicket Reservoir's 8.7 billion litre storage capacity, as well as the spring water within it, and would be capable of providing an additional 90 million litres of water a day to Hampshire. This would further support water resource requirements within the wider One Horton Heath development area.

¹⁴ Environment Agency and Natural Resources Wales (2013) Water stressed areas - final classification, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/244333/water-stressed-classification-2013.pdf

¹⁵ Environment Agency (2013) Test & Itchen River Restoration Strategy, https://s3-eu-west-2.amazonaws.com/wp-cainbio/wp-content/uploads/2018/02/18074217/T_I_RR_Strategy_Management_report_Issue_5_FINAL.pdf

¹⁶ Southern Water (2019) Securing a resilient future for water in the South: Our Water Resources Management Plan for 2020 – 70, https://www.southernwater.co.uk/media/3656/5025_wrmp_v11.pdf

¹⁷ Southern Water (2019) Water Resources Management Plan 2019: Technical Overview, <https://www.southernwater.co.uk/media/3657/wrmp19-technical-overview.pdf>

¹⁸ Hampshire Water Transfer and Water Recycling Project <https://www.hampshirewtwrp.co.uk>

5.1.2 Impact of the Quobleigh Breach development

Surface water from Quobleigh Breach will be collected in, and discharged from, a Sustainable Urban Drainage Systems (SUDS) in the northeast and southwest of the site, as well as water being intercepted by and infiltrating through vegetated habitats and other permeable surfaces (see Ecological Impact Assessment, Johns Associates, October 2025). This is discussed further at Section 5.2. The SUDS will discharge to local ditches and small watercourses (e.g. those associated with the western boundary of the Site, flowing to the north and those flowing from east to west, forming confluences with the western boundary watercourse) which in turn discharges to the River Itchen. Although the SUDS may retain and slow down the flow of water to the Itchen - which may be beneficial after heavy rains in reducing flood risk to downstream receptors - they will not significantly affect the overall amount of water flowing from the site to the River Itchen. The site wide drainage design maintains the current greenfield runoff rate as set out in the Flood Risk Assessment.

Wastewater from Quobleigh Breach will go to the Chickenhall Wastewater Treatment Works (WwTW). The Chickenhall WwTW is located 1.7km to the west of the wider One Horton Heath area, and discharges to the River Itchen.

5.1.3 In-combination effects

Southern Water's Water Resource Management Plan uses local authorities' housing projections as a basis for its water demand forecasts. As such, it caters for 'in combination' impacts of the current and likely future population over its entire area, i.e. 'in combination' impacts.

5.1.4 Mitigation measures

One Horton Heath does not need to provide mitigation measures beyond the Quobleigh Breach Drainage Strategy¹⁹ and SUDS discussed at Section 5.2, as Southern Water is providing mitigation measures for water abstraction over its entire area.

5.1.5 Conclusion of Appropriate Assessment of changes in hydraulic conditions on the River Itchen SAC

In conclusion, water abstraction from the River Itchen is controlled by the Environment Agency through abstraction licences. These have been agreed until 2030, and incorporate the growth expected within the Eastleigh Borough Council area. After 2030, Southern Water is expected to have new water facilities in place. There will be no significant changes to surface water entering the River Itchen as a result of the development proposals at Quobleigh Breach.

5.2 WATER POLLUTION AND SILTATION (RIVER ITCHEN SAC)

5.2.1 Background

Water pollution

The Itchen faces many pressures from water abstraction, flow diversions, discharges, agricultural runoff, channel modifications, fisheries management and human impacts associated with urbanisation alongside much of the river valley²⁰.

Elevated nutrients - notably nitrogen and phosphorus - in water interfere with the balance between plant species, favouring algae and leading to a loss of characteristic plant species. In classic chalk streams like the River Itchen, the

¹⁹ Drainage Strategy (Motion, 17 October 2025)

²⁰ Natural England (2014) Site improvement plan – River Itchen

keystone species is *Ranunculus penicillatus*. Over time, low river flows, combined with nutrient inputs from point sources (e.g. WwTW outflows) have increased the proportion of filamentous algae and nutrient-tolerant plants in the River Itchen, at the expense of *Ranunculus*²¹. In turn, the changes to plant community composition and structure, and the periodic reductions in dissolved oxygen due to large swards of algae, can affect the wider food web.

A 2013 study found that the water quality in the lower reaches of the River Itchen, which includes those parts of the river closest to Quobleigh Breach, was 'unfavourable' due to inappropriate water levels; inappropriate weirs, dams and other structures; invasive freshwater species; water pollution/ agricultural run-off; and water pollution discharge²².

Quobleigh Breach lies within a catchment that drains to Southern Water's Chickenhall wastewater treatment works, which is located approximately 1.7km to the west of the Site and discharges to the River Itchen. There are no significant constraints to prevent future housing growth related to Chickenhall, although it will require upgrades to its sewer networks, and further improvements to Chickenhall Wastewater Treatment Works, which are both planned by Southern Water.

Siltation

The River Itchen has been designated due to its riverine habitat, and southern damselfly and bullhead populations. However, it also has as qualifying features the native white-clawed crayfish, brook lamprey, Atlantic salmon and otter. Salmon in particular are very sensitive to siltation. An expert literature review²³ found that:

- Excessive fine sediments are lethal to spawning fish species such as salmon; and exposure to fine sediment during incubation lowers the fitness of those salmon alevins that survive hatching.
- Chalk streams are very sensitive to even minor increases in fine sediment concentrations because their riverbeds are unable to flush fine silts from gravels – hence the long tradition of cleaning gravel beds in these rivers.
- The rate and amounts of fine sediments that accumulate in spawning fish nests in riverbed gravels are directly related to the concentration and total load of fine sediment in the river.
- Fine organic matter is more lethal than inorganic fine sediment for incubating salmonid embryos, and the finest sediments (clays) are much more lethal than larger particles.

Sear (2019a)²⁴ found that much of the sediment load for the River Itchen is generated in winter, when the catchment surface is wet and there is a higher proportion of overland runoff; and during intense summer storms.

5.2.2 Impact of the Quobleigh Breach development

The watercourse on the western boundary of the Site is classified as a 'main river' and flows south to north under

²¹ Eastleigh Borough Council (2015) Issues and Options Eastleigh Borough Local Plan, Habitat Regulations Assessment Screening Report, <https://www.eastleigh.gov.uk/media/1715/habitats-regulation-assessment.pdf>; Poynter, A.J.W. (2013) Impacts of environmental stressors on the River Itchen *Ranunculus* community, PhD thesis, University of Birmingham, <https://etheses.bham.ac.uk/id/eprint/5112/1/Poynter14PhD.pdf>

²² Environment Agency (2013) Test & Itchen River Restoration Strategy, https://s3-eu-west-2.amazonaws.com/wp-cainbio/wp-content/uploads/2018/02/18074217/T_I_RR_Strategy_Management_report_Issue_5_FINAL.pdf

²³ Sear, D. (2019a) Impacts of fine sediments on river ecology, <https://www.eastleigh.gov.uk/media/6200/add-appendices-hs.pdf>

²⁴ Fine sediment, pollutants and microplastic impacts on the River Itchen SAC from the proposed Development Application B and C (Sear, 2019)

Allington Lane and into the River Itchen to the south of Chickenhall Lane Wastewater Treatment Works. Similarly, the watercourse in the north of the Site discharges into this unnamed 'Main River'. In 2019 the overall status of this unnamed main river was moderate, comprising high quality for fish and invertebrates, but lower status for other criteria, notably priority hazardous substances. Most of the Site is currently undeveloped greenfield land on slowly permeable, seasonally waterlogged soils over impermeable clay substrates with no storage capacity: this area will have a high standard percentage runoff and respond rapidly to rainfall. In its undeveloped state, the surface water runoff from the Site drains into the onsite watercourses, and from there into the 'main river'.

Current land use on the Site includes cattle grazed fields, and arable fields that present a bare soil surface at certain times of the year, all draining to the watercourses discharging into the Itchen. Future land uses will be partly built-up and partly green infrastructure, including wetlands/SUDS.

The following impact avoidance measures are inherent in the development design:

- Production and implementation of a detailed Construction Environmental Management Plan (CEMP) for the construction phase, including (but not limited to):
 - Clear construction site demarcation to ensure minimal footprint of temporary/ permanent development;
 - General best practice pollution prevention and response measures;
 - Careful access and construction routing;
 - Phasing and timing schedule;
 - A comprehensive suite of measures to avoid sediment transport and deposition at source, (e.g. locations of stockpiles away from watercourses; grassing/ sheeting of longer-term spoil heaps; methodologies for the transportation of materials and the cleaning of machinery, and control measures for the suppression of construction dust; the installation of temporary SuDS features as appropriate), combined with additional interception measures (e.g. erection of silt barrier fencing, settlement lagoons) and the provision of other control measures e.g. Siltbuster or equivalent to prevent sediment discharge in extreme weather;
 - Suppression of construction dust and litter;
 - CEMP management responsibilities, duties, monitoring, reporting etc.

During both construction and operational phases of the development:

- The provision of surfaced urban areas and permanently vegetated green infrastructure will permanently minimize the extent of exposed surfaces that will cause erosion and transport of sediment. This will reduce the potential for soil/ sediment erosion and transportation from the existing agricultural land use.
- All watercourses will be protected by a 10m ecological buffer (excluding SuDS connections and ecological improvements) with an associated 10-50m green infrastructure corridor (measured from the bank edge of water limit when watercourse is full). Watercourse severance has been minimised through the development.

Table 4 lists the remaining potential impacts of the Quobleigh Breach development on water quality in the River Itchen SAC post-avoidance measures.

Table 4: Potential impacts of the Quobleigh Breach development on water quality in the River Itchen SAC

Potential impact	Construction stage	Operation stage
Discharge of soil/ sediment into on site/ receiving watercourses and into the River Itchen at the confluence located at SU 46198 16665, upstream of Itchen Valley Country Park. Deposition of the sediment may affect designated features including macrophytes (in particular <i>Rununculus fluitantis</i> and <i>Callitriche-Batrachio</i> vegetation), macroinvertebrates (in particular southern damselfly <i>Coenagrion mercuriale</i>), fish (notably bullhead <i>Cottus gobio</i> , brook lamprey <i>Lampetra planeri</i> and Atlantic salmon <i>Salmo salar</i>) and otter <i>Lutra lutra</i> . Notably the condition of salmon spawning habitat (redds) through smothering of vegetation, blocking voids within the coarse bedload used by fish and invertebrates, introducing nutrients, metals and other deleterious substances bound to the sediment particles and influencing other aspects of water quality including nutrient enrichment and water transparency (turbidity).	√	√
Accidental release of pollutants (e.g. hydrocarbons, paints, solvents and other materials) and discharge into on-site/receiving watercourses and into the River Itchen at the confluence located at SU 46198 16665, upstream of Itchen Valley Country Park, affecting designated features including macrophytes, macroinvertebrates, fish, and mammals through reduction in water quality including exposure to substances with chronic/acute consequential effects.	√	√
Change (likely overall reduction during the course of the construction phasing) of agricultural sourced nutrients (in particular nitrates and phosphates) entering the soil and discharged through onsite/receiving watercourses into the Itchen at the confluence located at SU 46198 16665, upstream of Itchen Valley Country Park, through the conversion to urban land use and low nutrient managed open spaces and habitats with potential effects on eutrophication levels in the River Itchen and associated features of interest.	√	
Modification of onsite hydrological regime including small scale 0/1 st stage headwater catchments through changes in soil drainage character, introduction of formal drainage, severance of drainage systems, blockage of natural drainage systems with reduction in extent of wetland habitats (including marshy grassland/wet woodland) or supply of water to standing or running water bodies, or change in flood regime resulting in an increase in volume/rate and transport of sediment/erosion etc and change in flow characteristics and quality entering the Itchen at SU 46198 16665.	√	
Change in nutrient (nitrate and phosphate) emissions from the operation/occupation of the site largely associated with domestic and business generation, with agricultural contributions ceasing and application of fertilisers in open spaces minimised or avoided, but with generation of nutrients from urban operations including discharge of treated sewage arising from the development and urban sediment discharge, with potential effects on siltation and eutrophication levels in the receiving watercourse and associated features of interest.		√
Change in riverine flow in the River Itchen associated with increased abstraction by Southern Water to provide potable supply to the new population at Quobleigh Breach. Effects on the River Itchen SAC and associated features of interest from a change in flow regime.		√

5.2.3 Mitigation measures

Additional mitigation measures are proposed to deal with any residual; post-avoidance impacts on the integrity of the River Itchen SAC. These measures are detailed in a Nutrient Neutrality Study undertaken by Hilson Moran²⁵.

The following mitigation measures are proposed to deliver nutrient neutrality in the Quobleigh Breach development,

²⁵ Nutrient Neutrality Study One Horton Heath: Quobleigh Breach (Hilson Moran Ltd, 23 October 2025 37245-HML-XX-XX-RP-U-870002, Issue P01)

with the following considered in turn to deliver neutrality:

- Benefits brought forward from the Upper Acre development phase, which will be under construction upon the first occupation of dwellings at Quobleigh Breach, resulting in the conversion of 6 ha of agriculturally managed land to greenspace.
- Temporary off-setting nutrient losses from land changes associated with land within the Applicant's control during the pre-2030 phase.

In addition, the following best-practice measures will be implemented at the Site:

- Retention, protection and restoration of watercourses and associated riparian corridors including bankside and in-channel enhancement measures;
- Construction measures to minimise the likelihood of silt and pollutants reaching the 'main river', e.g. location of stockpiles away from watercourses, grassing/sheeting of longer-term spoil heaps;
- Professionally designed and extensive SuDS system including permeable surfaces, vegetated swales, and basins to include sediment forebays at the inlets and outlets, and functional wetland vegetation to promote the deposition of fine sediment and promote settling and binding of sediment in vegetated areas.
- Site-wide nitrate neutrality and balancing (see below).
- Rigorous programme of water quality monitoring (e.g. turbidity, suspended solids, conductivity, pH, nitrates, phosphates) during construction and operation, at each SuDS and leaving the site, to confirm the efficacy of the system in capturing fine sediment and capturing nitrates in particular. A management intervention mechanism will enable the removal of sediment from settlement areas and improvement in the system if required to ensure no net emissions of fine sediment in accordance with the measures set out in Chapter 10 of the ES for the Outline planning application, the ES Addendum and set out by Hilson Moran (2024a). Monitoring and management intervention to ensure no net emissions of nitrates (in particular) in accordance with nitrate neutrality measures as set out in Chapter 11 of the ES and in Hilson Moran (2024b²⁶).

This has been developed into a site-wide Water Management Strategy by Hilson Moran (2024), which comprises:

- Prevention: the use of good site design and housekeeping measures to prevent pollution, including:
 - Minimising the impermeable areas created on the site by providing soft landscaping and planting wherever possible.
 - Good site wide housekeeping and maintenance to minimise blockages and prevent pollution arising.
 - Provision of water butts for rear gardens.
 - The use of green roofs for public / commercial buildings where appropriate.
 - The use of rainwater harvesting/ reuse systems for public/ commercial buildings and sports pitches where appropriate.

²⁶ Hilson Moran. 2024b. Nutrient Neutrality. Outline Planning Application. One Horton Heath. XX-HML-XX-XX-RP-U-930001 Issue P05

- Installation of separators and other proprietary pollution control systems where land use requires or specific risks necessitate their use.
- Silt traps and trapped gullies to retain sediment.
- Planting within landscaped areas to encourage nutrient/ pollutant uptake and evapotranspiration.
- The implementation of a SuDS Maintenance Strategy. This should become a living document that is continuously reviewed following the detailed design.
- Source Control, i.e. control of runoff at or near its source, so that it does not enter the drainage system or is delayed and attenuated before it enters the drainage system, including:
 - Pervious Paving: This intercepts rainfall that lands on its surface before it can run overland into the downstream drainage system. This provides a degree of interception, particularly in the most polluted first-flush events, as well as filtration through the various layers of construction and through the stone sub-base. Pervious paving would typically be used for parking areas such as driveways, parking courts and car parks. Through the inclusion of a suitable flow control device, the stone sub-base in the pervious paving structure can be utilised to provide additional attenuation storage.
 - Bioretention Areas/ Rain Gardens: Bioretention areas utilise planting and constructed soils to intercept rainfall from their catchment areas, and contribute to interception storage, evapotranspiration and pollution removal. They can be placed around downpipes to intercept roof runoff, particularly from larger commercial buildings where they can form part of the landscape design. They can also be incorporated into traffic calming infrastructure such as build outs and into roadside planting and tree pits. Bioretention swales can be installed adjacent to larger areas of highway to provide water quality treatment and attenuation storage along their length.
 - Other filtration techniques: Filter Trenches and French Drains can be used to intercept runoff from larger parking areas and highways. These will provide interception storage and filtration through the stone fill within the trenches.
 - Site Control, i.e. the management of water from several sub-catchments within a development parcel (e.g. Quobleigh Breach).
 - Regional Control, which is the strategic management of runoff across the wider OHH site. The Strategic SuDS Features will provide the attenuation volume and flow control required to reduce post-development flow rates to below greenfield runoff rates. Strategic SuDS Features will incorporate erosion control and sediment forebays, designed in accordance with the guidance given in The SuDS Manual, to enhance water quality. The creation of wetland areas and the use of wetland planting within the Strategic SuDS Features will further contribute to the sediment and nutrient removal capacity of the site wide sustainable drainage systems.

This has been developed into an OPP Water Management Strategy by Hilson Moran.

5.2.4 Nutrient neutrality

The impact avoidance measures listed in Section 5.2.2 and the mitigation measures described above will already reduce the impacts of Quobleigh Breach with respect to runoff to drains. However, there is remaining uncertainty as to whether new 'in combination' developments, including other phases of the One Horton Heath development, will further deteriorate water quality within the SAC.

Since March 2018, Natural England has been advising that one means of addressing this uncertainty for larger developments such as the wider One Horton Heath proposals, that have the potential to result in increases of nitrogen entering a European site, is to calculate a nutrient budget and achieve nutrient neutrality^{27 28}.

Nutrient neutrality advice provided by NE in March 2022 to Local Planning Authorities (LPAs) affected by nutrient neutrality considerations included a new methodology for assessing nutrient neutrality, providing a unified approach for nitrate and phosphate and comprising a nutrient neutrality calculator with an accompanying guidance document²⁹. The methodology³⁰ and associated calculator³¹ was updated in May 2024 to include an additional Sustainable Drainage Systems (SuDS) worksheet, together with the inclusion of all the wastewater treatment work upgrades required under the new Water Industry Act 1991 duty, as announced in May 2024, enabling pre-2030 and post-2030 wastewater nutrient loadings to be calculated.

The generic approach is based on five main Stages, with a series of steps in each stage, which are summarised as:

- Stage 1 – Identify the increase in nutrient loading to a Habitats site that results from the increase in wastewater from a new development:
 - Step 1 – Calculate increase in population due to the development;
 - Step 2 – Calculate the increase in wastewater production due to the development;
 - Step 3 – Determine the concentration of nutrients in wastewater and calculate additional wastewater nutrient loads for pre-and post-2030.
- Stage 2 – Identify the nutrient loading from the past/present land use of the development site:
 - Step 1 – Obtain nutrient export values from current land use(s);
 - Step 2 – Calculate the annual nutrient export from current land use(s).
- Stage 3 – Identify the nutrient loading from the future mix of land use on the development site:
 - Step 1 – Calculate the annual export from future land use(s).
- Stage 4 – Calculate the nutrient load from future land uses removed through SuDS (this step should only be used if SuDS are being implemented within the boundary of the development as part of the plan or project):
 - Step 1 – Calculate the annual nutrient reduction from the types of SuDS included in the scheme.
- Stage 5 – Calculate the net change in nutrient loading to a Habitats site within the addition of a buffer. The net change in nutrient loading and the buffer is the nutrient budget:

²⁷ <https://www.push.gov.uk/wp-content/uploads/2020/06/Natural-England%E2%80%99s-latest-guidance-on-achieving-nutrient-neutrality-for-new-housing-development-June-2020.pdf>

²⁸ Parcel 51, in the south-eastern corner of the masterplan, is covered by a separate planning application (Ref. X/19/86475) and so has not been included in the nitrate neutrality calculations.

²⁹ Natural England (2022). Nutrient Neutrality Generic Methodology. Issue 1, February 2022

³⁰ Natural England & DEFRA (2024). Guidance: Using the nutrient neutrality calculators, <https://www.gov.uk/guidance/using-the-nutrient-neutrality-calculators> (accessed 10/06/24).

³¹ Natural England (2024). Nutrient Neutrality budget calculator for the River Itchen SAC. <https://www.gov.uk/government/publications/river-itchen-sac-nutrient-neutrality-calculator> (accessed 10/06/24).

- Step 1 – Calculate the nutrient budget;
- Step 2 – Add the buffer to the nutrient budget.

Although NE have put this methodology forward for use in demonstrating nutrient neutrality, they identify in their Nutrient Neutrality Generic Methodology Guide³² that the approach is not mandatory and, if they prefer, competent authorities can determine their own solutions as appropriate.

Incorporating a 20% buffer for nutrient losses as per NE guidance, the Quobleigh Breach development is identified to give rise to:

- 190.86 kg N/yr deficit pre-2030;
- 157.06 kg N/yr deficit post-2030;
- 5.72 kg TP/yr deficit pre-2030;
- 7.07 kg TP/yr deficit post-2030.

The following mitigation measures are proposed to deliver nutrient neutrality in the Quobleigh Breach development, with the following considered in turn to deliver neutrality:

- Benefits brought forward from the Upper Acre development phase, which will be under construction upon the first occupation of dwellings at Quobleigh Breach, resulting in the conversion of 6 ha of agriculturally managed land to greenspace.
- Temporary off-setting nutrient losses from land changes associated with land within the Applicant's control during the pre-2030 phase.

Following the inclusion of benefits brought forward from the Upper Acre phase of the development, the Hilson Moran study demonstrated that better than nutrient neutrality for N & P in the post-2030 scenario can be achieved. The results of this exercise demonstrate better than nutrient neutrality for N & P in the post-2030 scenario, with benefits of 444.73 kg N/yr and 6.33 kg P/yr.

With regard to the pre-2030 deficits of 190.86 kg N/yr and 5.72 kg P/yr, N and P-neutrality can be maintained pre-2030, through temporary land change measures, comprising:

- Temporary pre-2030 conversion of 6 ha of parcel 33 from agriculturally managed land to greenspace during construction of Lower Acre dwellings on the remainder of the plot (i.e. parcels 32, 34, 0.7 and the rest of parcel 33).
- Temporary pre-2030 conversion of 3.58 ha of parcel 26 from agriculturally managed land to greenspace during construction of Quobleigh Breach dwellings on the remainder of the plot (i.e. parcels 0.1, 0.2, 2, 3, 4, 8, 25, and 27).

When this temporary mitigation is taken into account it ensures better than nutrient neutrality for N & P loadings, with benefits of 76.25 kg N/yr and 2.32 kg P/yr, prior to 2030.

Consequently, as N & P can be demonstrated for both the pre- and post-2030 scenarios for the Quobleigh Breach scheme, no further mitigation measures need to be identified for this phase of the OHH development.

³² Natural England (2022) Nutrient Neutrality Generic Methodology. Issue 1, February 2022.

The above post-2030 N & P benefits of 444.73 kg N/yr and 6.33 kg P/yr will be carried forward to future parcels of the OHH masterplan (with the next anticipated to be the Folds scheme) and offset against future development parcels on the site as part of the overall mitigation package.

5.2.5 In combination impacts

'In combination' impacts on the River Itchen SAC arising from the Quobleigh Breach development are not predicted because of the robust design of the drainage and sediment attenuation systems set out in Chapters 10 and 11 of the OPP ES and as updated by Hilson Moran (2024a and 2024b). In addition, should it be required, further nutrient credits could be purchased.

5.2.6 Conclusion of Appropriate Assessment of water pollution to the River Itchen SAC

As part of the proposals, the following mitigation measures in turn are proposed to deliver nutrient neutrality in the Quobleigh Breach development site:

- Benefits brought forward from the Upper Acre development phase, which will be under construction upon the first occupation of dwellings at Quobleigh Breach, resulting in the conversion of 6 ha of agriculturally managed land to greenspace.
- Temporary off-setting nutrient losses from land changes associated with land within the Applicant's control during the pre-2030 phase.

Consequently, the impacts of the proposals will be fully mitigated and will ensure that they do not detrimentally affect local biodiversity or the conservation status of the River Itchen SAC or downstream European Designated Sites.

5.3 WATER POLLUTION (SOLENT AND SOUTHAMPTON WATER SPA, SOLENT MARITIME SAC)

5.3.1 Background

The Solent Maritime SAC / Solent and Southampton Water SPA also suffer from nitrogen and phosphorus pollution. This has caused excessive growth of green weed, which can form dense mats in the intertidal areas, inhibiting the natural functioning of these habitats. The Environment Agency has observed evidence of toxic contamination and thermal pollution in some areas of the SPA/SAC: both of these affect the fauna which are the qualifying features of the SAC/SPA³³.

Research by Natural England found the condition of the Solent Maritime SAC features - estuary, mudflat & sandflats, sandbanks – to be unfavourable. Information gained through MagicMap³⁴ also highlighted that the condition of the SSSIs that make up the terrestrial portion of the SAC are in mixed condition. The unfavourable assessment is based in part on poor water quality. Other attributes were also found to be failing, such as, for seagrasses, their extent, distribution, rhizome structure and reproduction as well as biomass, and for the intertidal mud and sand features their faunal quality. These failures are considered to be in part due to impacts from elevated nutrients³⁵.

³³ Eastleigh Borough Council *ibid*

³⁴ <https://magic.defra.gov.uk/MagicMap.html>

³⁵ Natural England (June 2020) Advice on achieving nutrient neutrality for new development in the Solent region, <https://www.push.gov.uk/wp-content/uploads/2020/06/Natural-England%E2%80%99s-latest-guidance-on-achieving-nutrient-neutrality-for-new-housing-development-June-2020.pdf>

The HRA for the Eastleigh Local Plan³⁶ notes that major sources of nitrogen to the Solent European marine sites are from:

- Coastal background seawater from the English Channel;
- Direct rivers and streams discharging into the sites;
- Indirect rivers and streams discharging elsewhere in the Solent; and
- Effluent discharges permitted by the Environment Agency.

5.3.2 Impact of Quobleigh Breach development

Table 5 lists the potential impacts of the Quobleigh Breach development proposals on water quality in the Solent and Southampton Water SPA and Solent Maritime SAC, post-avoidance measures.

5.3.3 In combination effects

It is not necessary to consider 'in combination' impacts for this issue as the wider One Horton Heath development is following a wider approach which means that it will essentially be nitrate neutral. Sediment and other contaminant releases from the site from both construction and operational stages are to be actively managed, and so this does not require consideration of in combination impacts:

"Article 6(3) of the Habitats Directive must be interpreted as not precluding national programmatic legislation which allows the competent authorities to authorise projects on the basis of an 'appropriate assessment' within the meaning of that provision, carried out in advance and in which a specific overall amount of nitrogen deposition has been deemed compatible with that legislation's objectives of protection."

Table 5: Potential impacts of the Quobleigh Breach development, post-avoidance measures, on the Solent and Southampton Water SPA and Solent Maritime SAC

Potential Impact	Construction stage	Operation stage
Discharge of soil/sediment into on site/receiving watercourses and transport into the Solent, introducing nutrients, metals and other deleterious substances bound on the sediment particles and influencing other aspects of water quality including nutrient enrichment and water transparency.	√	√
Accidental pollution of contaminants (e.g. hydrocarbons, paints, solvents and other materials used) and discharge into on site/receiving watercourses and transported into the Solent resulting in a reduction in water quality including exposure to substances with chronic or acute consequential effects.	√	√
Change of agricultural sourced nutrients (in particular nitrates and phosphates) entering the soil and discharged through onsite/receiving watercourses and transported to the Solent with potential effects on eutrophication levels and associated features of interest.	√	√

³⁶ Urban Edge (2019) Habitats Regulations Assessment: Eastleigh Borough Local Plan, <https://www.eastleigh.gov.uk/media/5477/ed12a-41-hra-main-report.pdf>

Potential Impact	Construction stage	Operation stage
Recreational disturbance from human and dog walking in areas associated with sensitive bird species, notably with effects on breeding viability. Species associated with this site are: • Black-tailed godwit (<i>Limosa limosa islandica</i>), non-breeding • Common tern (<i>Sterna hirundo</i>), breeding • Dark-bellied brent goose (<i>Branta bernicla bernicla</i>), non-breeding • Little tern (<i>Sternula albifrons</i>), breeding • Mediterranean gull (<i>Ichthyaetus melanocephalus</i>), breeding • Ringed plover (<i>Charadrius hiaticula</i>), non-breeding • Roseate tern (<i>Sterna dougalli</i>), breeding • Sandwich tern (<i>Thalasseus sandvicensis</i>), breeding • Teal (<i>Anas crecca</i>), non-breeding • Waterbird assemblage, non-breeding		√

5.3.4 Mitigation measures

Additional mitigation measures are proposed to deal with any residual, post-avoidance impacts on the integrity of the River Itchen SAC. These measures include:

- Retention, protection and restoration of watercourses and associated riparian corridors including bankside and in-channel enhancement measures;
- Construction measures to minimise the likelihood of silt and pollutants reaching the 'main river', e.g. locations of stockpiles away from watercourses, grassing/sheeting of longer-term spoil heaps;
- Professionally designed and extensive SuDS system including permeable surfaces, vegetated swales, and basins to include sediment forebays at the inlets and outlets, and functional wetland vegetation (as required) to promote the deposition of fine sediment and promote settling and binding of sediment in vegetated areas.
- Site-wide nitrate neutrality and balancing (see below).
- Rigorous programme of water quality monitoring (e.g. turbidity, suspended solids, conductivity, pH, nitrates, phosphates) during construction and operation, at each SuDS and leaving the site, to confirm the efficacy of the system in capturing fine sediment and capturing nitrates in particular. A management intervention mechanism will enable removal of sediment from settlement areas and improvement in the system if required, to ensure no net emissions of fine sediment.

A Water Management Strategy (Hilson Moran, 2024a) has been developed for the wider OPP area (including Quobleigh Breach RM Site and other development parcels), which comprises:

- Prevention: the use of good site design and housekeeping measures to prevent pollution, including:
 - Minimising the impermeable areas created on the site by providing soft landscaping and planting wherever possible.
 - Good site wide housekeeping and maintenance to minimise blockages and prevent pollution arising.

- Provision of water butts for rear gardens.
- The use of green roofs for public / commercial buildings where appropriate.
- The use of rainwater harvesting / reuse systems for public / commercial buildings and sports pitches where appropriate.
- Installation of separators and other proprietary pollution control systems where land use requires or specific risks necessitate their use.
- Silt traps and trapped gullies to retain sediment.
- Planting within landscaped areas to encourage nutrient / pollutant uptake and evapotranspiration.
- The implementation of a SuDS Maintenance Strategy. This should become a living document that is continuously reviewed following the detailed design of the upstream, on parcel SuDS elements.
- Source Control, i.e. control of runoff at or near its source, so that it does not enter the drainage system or is delayed and attenuated before it enters the drainage system, including:
 - Pervious Paving: This intercepts rainfall that lands on its surface before it can run overland into the downstream drainage system. This provides a degree of interception, particularly in the most polluted first-flush events, as well as filtration through the various layers of construction and through the stone sub-base. Pervious paving would typically be used for parking areas such as driveways, parking courts and car parks. Through the inclusion of a suitable flow control device, the stone sub-base in the pervious paving structure can be utilised to provide additional attenuation storage.
 - Bioretention Areas / Rain Gardens: Bioretention areas utilise planting and constructed soils to intercept rainfall from their catchment areas, and contribute to interception storage, evapotranspiration and pollution removal. They can be placed around downpipes to intercept roof runoff, particularly from larger commercial buildings where they can form part of the landscape design. They can also be incorporated into traffic calming infrastructure such as build outs and into roadside planting and tree pits. Bioretention swales can be installed adjacent to larger areas of highway to provide water quality treatment and attenuation storage along their length.
 - Other filtration techniques: Filter Trenches and French Drains can be used to intercept runoff from larger parking areas and highway areas. These will provide interception storage and filtration through the stone fill within the trenches.
- Site Control, i.e. the management of water from several sub-catchments within a development parcel (e.g. the Phase 1 OPP). Through close consultation with the layout designers, flow conveyance measures such as swales and filter trenches can be incorporated into the development parcels to provide additional attenuation, treatment, amenity and opportunities for habitat creation.
- Regional Control, which is the strategic management of runoff across the wider OHH site. The Strategic SuDS Features will provide the attenuation volume and flow control required to reduce post-development flow rates to below greenfield runoff rates. Strategic SuDS Features will incorporate erosion control and sediment forebays, designed in accordance with the guidance given in The SuDS Manual, to enhance water quality. The creation of wetland areas and the use of wetland planting within the Strategic SuDS Features will further contribute to the sediment and nutrient removal capacity of the site wide sustainable drainage systems.

5.3.5 Nutrient neutrality

The impact avoidance measures listed at Table 5 and the mitigation measures listed in 5.2.4 above will already reduce the impacts of Quobleigh Breach with respect to runoff to drains. However, there is remaining uncertainty as to whether new 'in combination' developments, including One Horton Heath, will further deteriorate water quality within the SPA/SAC.

Since March 2018, Natural England has been advising that one means of addressing this uncertainty for larger developments such as the wider One Horton Heath proposals, that have the potential to result in increases of nitrogen entering a European site, is to calculate a nutrient budget and achieve nutrient neutrality (see Section 5.2.4).

Nutrient neutrality advice provided by NE in March 2022 to Local Planning Authorities (LPAs) affected by nutrient neutrality considerations included a new methodology for assessing nutrient neutrality, providing a unified approach for nitrate and phosphate and comprising a nutrient neutrality calculator with an accompanying guidance document³⁷. The methodology³⁸ and associated calculator³⁹ was updated in May 2024 to include an additional Sustainable Drainage Systems (SuDS) worksheet, together with the inclusion of all the wastewater treatment work upgrades required under the new Water Industry Act 1991 duty, as announced in May 2024, enabling pre-20130 and post-2030 wastewater nutrient loadings to be calculated.

The generic approach is based on five main Stages, with a series of steps in each stage, which are summarised as:

- Stage 1 – Identify the increase in nutrient loading to a Habitats site that results from the increase in wastewater from a new development:
 - Step 1 – Calculate increase in population due to the development;
 - Step 2 – Calculate the increase in wastewater production due to the development;
 - Step 3 – Determine the concentration of nutrients in wastewater and calculate additional wastewater nutrient loads for pre-and post-2030.
- Stage 2 – Identify the nutrient loading from the past/present land use of the development site:
 - Step 1 – Obtain nutrient export values from current land use(s);
 - Step 2 – Calculate the annual nutrient export from current land use(s).
- Stage 3 – Identify the nutrient loading from the future mix of land use on the development site:
 - Step 1 – Calculate the annual export from future land use(s).
- Stage 4 – Calculate the nutrient load from future land uses removed through SuDS (this step should only be used if SuDS are being implemented within the boundary of the development as part of the plan or project):
 - Step 1 – Calculate the annual nutrient reduction from the types of SuDS included in the scheme.

³⁷ Natural England (2022). Nutrient Neutrality Generic Methodology. Issue 1, February 2022

³⁸ Natural England & DEFRA (2024). Guidance: Using the nutrient neutrality calculators, <https://www.gov.uk/guidance/using-the-nutrient-neutrality-calculators> (accessed 10/06/24).

³⁹ Natural England (2024). Nutrient Neutrality budget calculator for the River Itchen SAC. <https://www.gov.uk/government/publications/river-itchen-sac-nutrient-neutrality-calculator> (accessed 10/06/24).

- Stage 5 – Calculate the net change in nutrient loading to a Habitats site within the addition of a buffer. The net change in nutrient loading and the buffer is the nutrient budget:
 - Step 1 – Calculate the nutrient budget;
 - Step 2 – Add the buffer to the nutrient budget.

Although NE have put this methodology forward for use in demonstrating nutrient neutrality, they identify in their Nutrient Neutrality Generic Methodology Guide⁴⁰ that the approach is not mandatory and, if they prefer, competent authorities can determine their own solutions as appropriate.

Incorporating a 20% buffer for nutrient losses as per NE guidance, the Quobleigh Breach development is identified to give rise to:

- 190.86 kg N/yr deficit pre-2030;
- 157.06 kg N/yr deficit post-2030;
- 5.72 kg TP/yr deficit pre-2030;
- 7.07 kg TP/yr deficit post-2030.

The following mitigation measures are proposed to deliver nutrient neutrality in the Quobleigh Breach development, with the following considered in turn to deliver neutrality:

- Benefits brought forward from the Upper Acre development phase, which will be under construction upon the first occupation of dwellings at Quobleigh Breach, resulting in the conversion of 6 ha of agriculturally managed land to greenspace.
- Temporary off-setting nutrient losses from land changes associated with land within the Applicant's control during the pre-2030 phase.

Following the inclusion of benefits brought forward from the Upper Acre phase of the development, the Hilson Moran study demonstrated that better than nutrient neutrality for N & P in the post-2030 scenario can be achieved. The results of this exercise demonstrate better than nutrient neutrality for N & P in the post-2030 scenario, with benefits of 444.73 kg N/yr and 6.33 kg P/yr.

With regard to the pre-2030 deficits of 190.86 kg N/yr and 5.72 kg P/yr, N and P-neutrality can be maintained pre-2030, through temporary land change measures, comprising:

- Temporary pre-2030 conversion of 6 ha of parcel 33 from agriculturally managed land to greenspace during construction of Lower Acre dwellings on the remainder of the plot (i.e. parcels 32, 34, 0.7 and the rest of parcel 33).
- Temporary pre-2030 conversion of 3.58 ha of parcel 26 from agriculturally managed land to greenspace during construction of Quobleigh Breach dwellings on the remainder of the plot (i.e. parcels 0.1, 0.2, 2, 3, 4, 8, 25, and 27).

When this temporary mitigation is taken into account it ensures better than nutrient neutrality for N & P loadings, with benefits of 76.25 kg N/yr and 2.32 kg P/yr, prior to 2030.

⁴⁰ Natural England (2022) Nutrient Neutrality Generic Methodology. Issue 1, February 2022.

Consequently, as N & P can be demonstrated for both the pre- and post-2030 scenarios for the Quobleigh Breach scheme, no further mitigation measures need to be identified for this phase of the OHH development.

The above post-2030 N & P benefits of 444.73 kg N/yr and 6.33 kg P/yr will be carried forward to future parcels of the OHH masterplan (with the next anticipated to be the Folds scheme) and offset against future development parcels on the site as part of the overall mitigation package.

5.3.6 In combination effects

'In combination' impacts on the River Itchen SAC arising from the Quobleigh Breach development are not predicted because of the robust design of the drainage and sediment attenuation systems. In addition, should it be required as a result of future discussions or monitoring, further nutrient credits could be purchased.

5.3.7 Conclusions of the Appropriate Assessment of water pollution to the Solent Maritime SAC and Solent and Southampton Water SPA

As part of the proposals, the following mitigation measures in turn are proposed to deliver nutrient neutrality in the Quobleigh Breach development site:

- Benefits brought forward from the Upper Acre development phase, which will be under construction upon the first occupation of dwellings at Quobleigh Breach, resulting in the conversion of 6 ha of agriculturally managed land to greenspace.
- Temporary off-setting nutrient losses from land changes associated with land within the Applicant's control during the pre-2030 phase.

Consequently, the impacts of the proposals will be fully mitigated and will ensure that they do not detrimentally affect local biodiversity or the conservation status of the Solent and Southampton Water SPA and Solent Maritime SAC.

It is concluded that no likely significant effects associated with a deterioration in water quality in the Solent Maritime SAC/ Solent and Southampton Water SPA as a result of the Quobleigh Breach development will occur.

5.4 RECREATIONAL IMPACTS (SOLENT AND SOUTHAMPTON WATER SPA, SOLENT MARITIME SAC)

5.4.1 Background

The Solent coast, particularly its mudflats, shingle and saltmarshes, provide essential winter feeding and roosting grounds for birds that spend the winter here. The Solent and Southampton Water SPA is designated for its feeding and roosting estuarine birds.

A wide range of recreational activities which take place on the Solent coast can disturb birds. Birds may need to be more alert, reducing the amount of food that they eat. They may move away from the disturbance, reducing their feeding time and using energy to fly. Substantial disturbance may cause food-rich areas to be little used by the birds or avoided altogether, leading to other areas hosting a higher density of birds and intensifying the competition for the available food. Cumulatively this can lead to increased bird mortality, or to a bird having less energy available at the end of the winter period to fly back to its breeding grounds. If birds cannot complete their migratory journey

or are not in sufficiently good condition to breed when they arrive, then the bird population can drop⁴¹.

Research carried out in 2009-2013 found that by far the most popular activity taking place at the Solent coast is walking. Along with jogging and cycling, this accounted for 91% of all recreational activity. Other types of recreational use included surfing, horse riding and rowing. Dogs off lead accounted for 47% of all incidents where birds flew more than 50m to escape disturbance. The research predicted a 13% increase in visitor numbers to the Solent coast as a result of planned new housing.

Suitable alternative natural greenspace (SANGs) located away from the European site can draw users away from the European sites by providing comparable alternative facilities, especially for dog walkers. However, SANGs need to be tailored to provide a viable and attractive alternative destination, matching the draw of the relevant designated European site or providing a near-equivalent recreational experience in a more convenient location. This may be difficult to do for an estuarine site like the Solent and Southampton SPA/ Solent Maritime SAC. This is because many people who visit the Solent coast do so for the sea views and the feeling of 'being beside the sea'. In a survey of visitors to the Solent, one-third of respondents stated that nothing could be done to make an alternative site more attractive to them.

5.4.2 Impact of the Quobleigh Breach development

The wider One Horton Heath development will include an extensive network of footpaths and play/sports facilities as part of the scheme, both within the developed areas and as green infrastructure corridors across the site to provide easy local access to outdoor recreational facilities and to deliver on site recreational capacity for 5775 residents. Figure 12 shows this network. Following a site visit with Natural England on the 16 August 2024, areas that appeared to be the most straightforward to deliver as on-site recreational mitigation, using design criteria associated with Alternative Natural Recreational Greenspace (ANRG) were reviewed and agreed. It is believed that this should cater for most day-to-day walking, dog walking and cycling journeys of Quobleigh Breach residents, although some will still want to visit the Solent and Southampton SPA, Solent Maritime SAC, and other nearby European sites. The new recreational provision at One Horton Heath may also draw some nearby residents of e.g. Horton Heath or Fair Oak who currently visit the SPA/SAC, thus further lessening the recreational impact of the new development on European sites.

⁴¹ Bird Aware Solent (2017) Solent Recreation Mitigation Strategy, https://solent.birdaware.org/media/29372/Bird-Aware-Solent-Strategy/pdf/Solent_Recreation_Mitigation_Strategy.pdf

Figure 12: Open space and footpath network at the wider One Horton Heath site

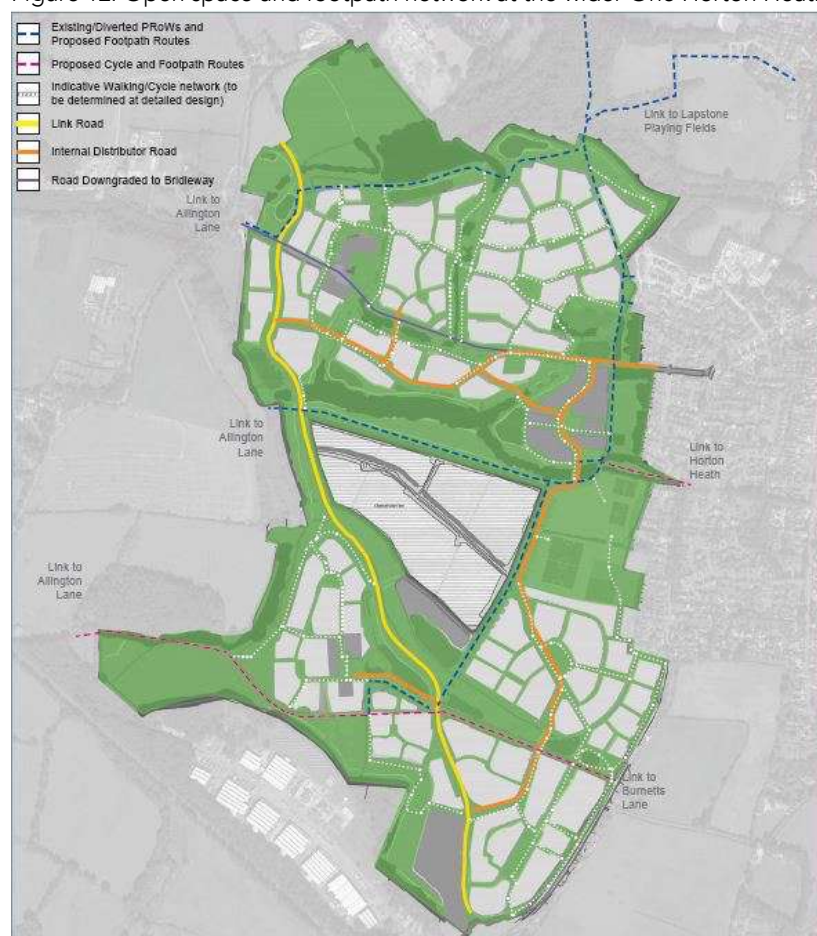


Table 6 summarises how the recreational facilities planned for the One Horton Heath development (incorporating the Quobleigh Breach RM parcel) contribute towards meeting criteria set out in Appendix B of the Solent Recreational Mitigation Strategy (Bird Aware Solent, 2017)⁴².

The design of the on-site recreational provision aims, as far as possible, to reduce the whole site's recreational impacts on the Solent SPA/SAC/Ramsar and New Forest SPA/Ramsar/SAC recreational impacts. In addition to the proposed on-site greenspace and compatible recreational mitigation measures, the applicant has committed to making a proportional financial contribution to provide additional Suitable Alternative Natural Greenspace (SANG) at Itchen Valley Country Park and potentially elsewhere (e.g. Stoke Park Farm) if required. Through the provision of SANGs within the Borough both existing and future residents will be encouraged away from the New Forest and Solent sites thereby reducing and mitigating impacts associated with recreational disturbance.

Subject to on-going negotiations with Natural England, should the on-site provision or the off-site measures at Itchen Valley Country Park not be suitable to fully off-set recreational impacts to the Solent, then a payment to the Bird Aware scheme would be provided.

⁴² [https://solent.birdaware.org/media/29372/Bird-Aware-Solent-Strategy/pdf/Solent Recreation Mitigation Strategy.pdf](https://solent.birdaware.org/media/29372/Bird-Aware-Solent-Strategy/pdf/Solent_Recreation_Mitigation_Strategy.pdf)

Table 6: BIRD aware SANGs Location Criteria

Criterion	Site information – On Site Recreational Mitigation and Other Measures
A wholly new site or an enhancement of existing public open space if the site is currently underused and has substantial capacity to accommodate additional recreational activity or could be expanded, considering the availability of land and its potential for improvement;	The proposed OHH greenspace and on-site recreational mitigation will be located on a site which is currently not accessible to the public, except for the existing PRoW located within the site.
Be in a location where it will divert visitors especially dog walkers away from sections of SPA coast which are sensitive to additional human disturbance and where a significant increase in visitors is predicted;	The routes will provide an accessible, convenient option for residents for dog walking and recreational use, in close proximity to residential properties.
Be located where it will attract visitors who would otherwise have gone to those sections of coast	
Be large enough to include a variety of paths which enable at least one circular walk of at least 5 km (approx. a 60 min walk);	The Proposed Development will include a network of foot and cycle routes making full use of the large amount of public open space proposed across the Site. These routes include several longer-distance circular walks within the greenspace and recreational mitigation proposed.
Be in a location where a SANG would be acceptable in terms of planning policy and traffic generation, and would not have an unacceptable impact on biodiversity e.g. A nature conservation site protected under a local or national designation.	The site has planning consent for residential led mixed use development, including public open space and walking routes. It is also the subject of a draft allocation for mixed-use development in the emerging Eastleigh Local Plan. The site does not contain any statutorily designated nature conservation sites.
Be sufficiently large to be perceived as a cohesive semi-natural space, offering tranquility, with little intrusion of artificial structures (except in the immediate vicinity of car parks) and with no unpleasant intrusions of other kinds e.g. wastewater treatment odours	The Proposed Development includes 16.9ha of ANRG compatible public open space that will be connected through a network of formal and informal walking and cycling routes. The proposed OHH greenspace and ANRG will not necessarily offer complete tranquility, but a network of interconnected routes will be provided through areas of semi-natural green corridors which are tranquil. Green corridors will be managed as semi-natural landscapes.

No part of Quobleigh Breach falls within the Solent Mitigation and Disturbance Zone.

5.4.3 In combination effects

It is not necessary to consider 'in combination' impacts as One Horton Heath is following a wider approach to the issue, namely on-site provision of recreational facilities based on ANRG criteria, plus, the applicant has committed to making a proportional financial contribution to an EBC projects to provide Suitable Alternative Natural Greenspace. Through the provision of SANGs within the Borough both existing and future residents will be encouraged away from the New Forest and Solent sites thereby reducing and mitigating impacts associated with recreational disturbance.

5.4.4 Conclusion of the Appropriate Assessment of recreational impacts to Solent and Southampton Water SPA, Solent Maritime SAC

The high-quality green infrastructure at One Horton Heath, characterised by woodland, grassland and wetlands, together with the connected wider Public Right of Way Network provides an extensive resource for walking, exercising dogs and other recreational activities that will be both immediately available and of value to new residents of Quobleigh Breach. These on-site facilities will help contribute to limiting the number and frequency of visits to the Solent and Southampton Water SPA and Solent Maritime SAC, thereby reducing the magnitude of any disturbance to features of interest that are sensitive to recreational disturbance. The Applicant has committed to making a proportional financial contribution to EBC projects to provide Suitable Alternative Natural Greenspace (SANG). Through the provision of SANGs within the Borough both existing and future residents will be encouraged away from the New Forest and Solent sites thereby reducing and mitigating impacts associated with recreational disturbance.

Subject to the outcome of final negotiations with Natural England, any residual recreational pressure will be fully mitigated through the provision of an appropriate payment to the Solent Bird Aware scheme.

5.5 RECREATIONAL IMPACTS (NEW FOREST SPA, SAC AND RAMSAR SITE)

5.5.1 Background

Like the Solent and Southampton Water SPA, the New Forest SAC/SPA/Ramsar hosts a range of birds that are sensitive to disturbance. Of these, ground and near-ground nesting birds such as the Dartford warbler, nightjar and woodlark are particularly sensitive. The breeding success of nightjar is significantly lower close to paths, and nightjar populations decrease with proximity of housing. Dartford warblers in heavily disturbed areas delay the start of their breeding, preventing multiple breeds. Most of this disturbance is from dogs running through vegetation. Removal of human disturbance results in an increase of 13 – 48% in the breeding population of woodlark. Other impacts from visitor pressure include arson, litter and fly-tipping, trampling and soil compaction, localised nutrient and predation by people and pets⁴³. In addition, consideration needs to be given to localised nutrient increased from dog urine/faeces and emissions to air and associated deposition from road traffic.

The New Forest National Park received 15.2 million recreation and leisure visitor-days (one person coming for at least part of one day) in 2017⁴⁴. A telephone survey of 2000 people – including 138 from Eastleigh Borough Council – was carried out in late 2018 to investigate factors that lead to tourism visits to the New Forest. It found that 75% of visitors live within 13.8km of the New Forest. Of the 138 interviewees from Eastleigh:

- About two-thirds (64%) had visited the New Forest heaths and woods in the past year.

⁴³ Urban Edge (2019) Habitats Regulations Assessment for the Eastleigh Borough Local Plan 2016-2036, <https://www.eastleigh.gov.uk/media/5477/ed12a-41-hra-main-report.pdf>

⁴⁴ <https://www.newforestnpa.gov.uk/conservation/managing-recreation/future-forest/recent-changes-affecting-forest/>

- The proportion of people visiting the New Forest, and the number of visits, declined the further people lived from the New Forest, as did the proportion of visits to the New Forest compared with other green space locations.
- The most common frequency of visits from people living 10-25km away was less than once a month, followed by once a month.
- The most common activity carried out by interviewees in the New Forest was walking and dog walking. The proportion of dog walking generally declined with distance, but dog walkers tended to visit more frequently than other users⁴⁵.

For Eastleigh residents the top four reasons for visiting the New Forest were:

1. Habit / familiarity / previous experience
2. Quick and easy travel route / en-route
3. Choice of routes and
4. Scenery/variety of views.

Greenspaces nearer to where people live are likely to act as alternatives for at least some visits to the New Forest, including for existing residents, e.g. of Horton Heath or Fair Oak. This is particularly the case if they can replicate some of these attractions such as providing a network of routes, and if they are more convenient and offer other facilities or reasons to visit.

Research conducted by Footprint Ecology (published in 2020⁴⁶), identified that increasing levels of access can have negative impacts on wildlife. Visits to the natural environment have shown a significant increase in England as a result of the increase in population and a trend to visit more. The issues are particularly acute in southern England, where population density is highest. Issues are varied and include disturbance, increased fire risk, contamination and damage.

5.5.2 Impact of the Quobleigh Breach development

Quobleigh Breach is located approximately 13.13 km from the nearest areas of the New Forest at as the crow flies, but is at least 30km away by car, as Southampton Water is between the Site the New Forest. Quobleigh Breach will have about 272 dwellings (approximately 652 residents) when completed. Some of these residents are likely to visit the New Forest SPA/SAC/Ramsar site and could cause effects through:

- Recreational disturbance and habitat degradation e.g. erosion/poaching from human and dog walking in areas associated with sensitive bird species, notably with effects on breeding viability.
- Change in nutrient status in localised areas and change in associated habitat condition from dog urine/faeces and emissions to air and deposition from road traffic (Table 7).

⁴⁵ Eastleigh Borough Council (2019) Eastleigh Borough Local Plan 2016-2036, Interim New Forest Recreation Mitigation, <https://www.eastleigh.gov.uk/media/5479/ed12c-update-44-new-forest-interim-mitigation.pdf>

⁴⁶ Footprint Ecology. 2020. Recreation use of the New Forest SAC/SPA/Ramsar: Impacts of recreation and potential mitigation approaches

5.5.3 In combination effects

By 2037, the New Forest is expected to receive over 17 million recreational visitor days, up from 15.2 million currently⁴⁷. Eastleigh Borough Council calculates that, over the lifetime of the Local Plan 2016 – 2036, there will be an additional 27,994 recreational visits from new council residents to the New Forest every year. Some of these will be from Quobleigh Breach and wider One Horton Heath development and as such in-combination effects may occur.

5.5.4 Mitigation measures

The wider OHH development provides a substantial level of Green Infrastructure incorporating open space, landscaping, existing public rights of way, new and improved footpaths, Sustainable Drainage (SuDS) and ecological and biodiversity enhancements. The network of greenspaces and public rights of way offers a variety of both long and short distance routes that will appeal to dog walkers and walkers more generally on a day-to-day basis. OHH subsequently provides future residents with significant recreational opportunities that would reduce the need to visit the New Forest protected sites and providing a function broadly commensurate to that of Suitable Alternative Natural Greenspace.

The provision of Alternative Natural Recreational Greenspace (ANRG) as a substitute for SANG was agreed between New Forest District Council (NFDC) and Natural England in 2021. As part of consultation on this matter, Natural England has accepted that the provision of Alternative Natural Recreational Greenspace (ANRG) at One Horton Heath can be included as mitigation for the New Forest Protected sites, provided it is of a suitable design and quality.

One Horton Heath submitted an application for Green Infrastructure on the site in January 2024 (Application Reference F/24/96895) which has been withdrawn to allow it to be suitably redesigned to fulfil the ANRG requirements. This application will be brought forward as a Reserved Matters application subsequent to the Outline Planning Application being determined, with the intention being to engage with Natural England throughout the design process. The quantum of ANRG at One Horton Heath will be conclusively determined following the submission of these reserved matters.

The improvements to IVCP have been implemented and the additional capacity is in the process of being 'signed off' by Natural England. On-site ANRG provision need to be in effect prior to the occupation of later phases. Further details of on-site mitigation (ANRG) can therefore be secured by planning condition(s). The following condition is proposed:

Reserved Matters applications for the 1657th and further dwellings shall include details finalising the extent of on-site recreational mitigation measures. Details of the on-site recreational mitigation provision shall include proposed planting, footpaths, bins, signage, funding and future management and maintenance arrangements, with the final quantum and details of the on-site recreational mitigation as agreed by the Local Planning Authority and Natural England.

Reason – To ensure that mitigation requirements in excess of Eastleigh Borough Council's Interim Mitigation Strategy is agreed with Natural England prior to the construction of any unit sitting outside of Natural England's 8 hectare per 1,000 standard.

On site recreational mitigation as permitted under Planning Condition will be fully implemented to the satisfaction of the Local Planning Authority and Natural England prior to the first occupation of the 1,657th unit.

⁴⁷ <https://www.newforestnpa.gov.uk/conservation/managing-recreation/future-forest/recent-changes-affecting-forest/>

Table 7: Overview of on-site recreational mitigation at One Horton Heath

	Publicly Accessible Area (Ha)
Northwest Area	4.4ha
Central Area	4.6ha
South-West Area	7.9ha
Total	16.9ha

The combination of the initial payment toward IVCP in conjunction with the on-site mitigation would be equivalent to 29.7ha of mitigation leaving a shortfall of 14ha against Natural England's standard of 8ha of SANG per 1000 population.

This is summarised in Table 8.

Table 8: Comparison of mitigation offered by proposals using NE SANG requirement

Proposal	HA of mitigation	Mitigates	OHH Phases	OHH First Occupation
Itchen Valley Country Park upgrade.	12.8ha	667 units 1600 persons	Lower Acre	2025
			~~Quobleigh Breach~~	2028
On-site mitigation (ANRG)	16.9ha	880 units 2,113 persons	Local Centre	2028
			Upper Acre	2029
			~~Round Copse~~	2030
			The Holme	2030
Additional payment to EBC or NFDC to provide further Off-Site mitigation	17.4ha	953 units 2,177 persons	The Folds	2031
			~~Chalcroft Farm~~	2032
			~~Homestall~~	2033
Total	47.1ha	2,500 units* 5,890 persons		

One Horton Heath are therefore prepared to commit to a supplemental payment towards the provision of SANG in Eastleigh Borough that offsets this shortfall prior to the commencement of any phases not fully mitigated by other aspects of the proposal.

During engagement with Natural England on this matter, an issue with this supplemental payment was a lack of certainty over what SANG provision this future payment would fund. A route through this issue, is the naming of a SANG which has sufficient capacity to operate as a backstop if contributions to the IVCP and on-site recreational mitigation deliver on site fall short.

To that end, the provision SANG at Stoke Farm is considered suitable. Stoke Park Farm is within the catchment of One Horton Heath and an application (App Ref: F/23/95844) for 21 hectares at Stoke Park Farm was approved on the 17 July 2024. There is correspondingly adequate capacity to meet the current 14ha shortfall. This application is also part of a much larger 100-hectare area that has been acquired by the Council for the delivery of SANG and additional capacity is likely to come forward in this location prior to the construction of later phases of One Horton Heath.

The supplemental payment would need to be secured via a s106 Agreement as Eastleigh Borough Council do not secure financial payments via condition. The payment would be prior to the commencement of the later phases not

covered by earlier mitigation with sufficient flexibility built into the wording to allow the level of fee to change in proportion to on-site ANRG mitigation, or, that monies be used to fund SANG in an alternative location (i.e. not necessarily Stoke Farm). The following wording is proposed:

A supplemental payment of £xx/ha or £8,880/dwelling index linked from September 2024 towards Suitable Alternative Natural Greenspace (SANG) within Eastleigh Borough to be paid, if necessary, prior to the commencement of any phase of development not fully mitigated by improvements to Itchen Valley Country Park or on-site recreational mitigation as determined by Condition XX of Planning Permission O/20/89498. In the event that sufficient mitigation to the New Forest Protected Sites, as per Natural England's 8 hectare per 1,000 standard, is fully met by early measures, no supplemental payment is required.

The supplemental payment will be used to fund the delivery of SANG at Stoke Park Farm, however, should a suitable alternative SANG project become available the monies can be directed there accordingly following consultation with Natural England.

5.5.5 Conclusion of the Appropriate Assessment of the recreational impacts on the New Forest SPA/ SAC/ Ramsar site

The One Horton Heath team will look to confirm a package of mitigation against the 8ha per 1000-person standard. This would be on a 'commercially expedient' basis so as to not undermine the EBC Interim Mitigation Strategy which remains the current adopted policy approach.

The extent of on-site recreational mitigation can only be comprehensively quantified once the Reserved Matters application for Green Infrastructure has been submitted. It is expected that the level of mitigation provided through on-site mitigation will increase as there is additional land within and adjacent to the site that can be utilised. It is expected that the level of mitigation provided via the on-site land within the wider OHH site will increase in due course. Correspondingly, the requirement for a supplemental payment will reduce, or potentially fall away altogether.

Consequently, the impacts of the proposals will be fully mitigated and will ensure that they do not detrimentally affect the conservation status of the New Forest SPA and SAC.

5.6 AIR QUALITY IMPACTS (NEW FOREST SAC AND RAMSAR SITE)

5.6.1 Background

The air quality modelling carried out for Chapter 7 of the ES for the OHH OPP concluded that One Horton Heath will have negligible air pollution impacts at all receptors except Knowle Lane/Botley Road where the NO_x impact was expected to be slight. In particular, para. 7.1.1 noted that:

"EBC requested that air quality impacts were also considered on the New Forest SSSI/SPA/SAC, however, further assessment of this receptor has been scoped out due to the distance of the receptor from the site. The transport model did not extend to this location and as such, the development vehicle flows at this location will not exceed the threshold criteria for assessment as discussed in section 7.2.23. It can, therefore, be concluded that any impacts on the New Forest SSSI/SPA/SAC will be negligible and will be Not Significant."

6 CONCLUSIONS

In conclusion, the information presented to support an Appropriate Assessment of the Quobleigh Breach Reserved Matters Planning Application has been determined and presented in a robust manner, to a high standard of investigation, is based on the best up-to-date scientific knowledge and has no gaps.

A detailed review of the project, its potential impacts, and the relevant conservation objectives of the New Forest SAC and SPA, the River Itchen SPA, the Solent and Southampton Water SAC, the Solent SAC and the Emer Bog SAC has been conducted. The information to support an Appropriate Assessment has concluded at a level “capable of removing all reasonable scientific doubt”, that the proposed development is not likely to have significant adverse effects on the integrity of these sites or their qualifying features.

The assessment has considered all relevant information, including the potential direct, indirect, and cumulative effects on the habitats and species for which the sites are designated. As no likely significant effects have been identified, it is concluded that the project, either alone or in combination with other plans or projects, will not adversely affect the integrity of these European sites, in accordance with Article 6(3) of the Habitats Directive.

Table 9 summarises the evidence to support these conclusions.

Table 9: Conclusions

What is needed	What is proposed in the HRA
Proof that water levels in the River Itchen will not change	Southern Water’s Water Resource Management Plan deals with water levels in the River Itchen
Proof that water quality (nitrogen, phosphorus, siltation) in the River Itchen will not deteriorate	SuDS ‘management train’ will trap pollutants on site Wastewater to be treated at Chickenhall WwTW Updated nutrient neutrality study shows that Quobleigh Breach will result in net neutrality nitrogen and phosphorous input to River Itchen and Solent Monitoring regime to demonstrate no emissions and feedback to enable management intervention if necessary
Proof that water quality (nitrogen, phosphorus) in the Solent will not deteriorate	
Proof that recreational impacts at Solent sites will not increase	On-site recreational provision, including greenspace commensurate with ANRG and financial contribution to EBC projects to provide Suitable Alternative Natural Greenspace (SANG) at Itchen Valley Country Park and Stoke Farm.
Proof that recreational impacts at New Forest sites will not increase	A robust set of proposed mitigation measures for the New Forest SAC and SAC sites.
Proof that air quality at the New Forest will not deteriorate	Air quality modelling presented in Chapter 7 of the OHH OPP ES showed no significant impact.