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UNITED KINGDOM

11 February 2026

Project/File: 332612638

via Email

Gregg Chapman
Eastleigh Borough Council
Eastleigh House
Upper Market Street
Eastleigh
SO50 9YN

Dear Gregg,

Upper Acre, One Horton Heath (LPA Reference RM/25/100575): Response to Environment Agency Comments

We write on behalf of Eastleigh Borough Council (One Horton Heath Team) (the ‘**Applicant**’) in response to the Environment Agency’s comments (dated 31 December 2025). This letter offers additional information to that contained within the *Ecological Impact Assessment (9 February 2026)*, *Biodiversity Net Gain (BNG) Report (10 February 2026)*, and *BNG Metric* enclosed. This letter should be read in conjunction with those submissions.

Responses

The following responses are offered to the Environment Agency’s comments, each bullet point in turn:

“Details for each of the 5 culverts and the locations as mentioned in the report but not detailed.”

There aren’t 5 culverts, this was an error. There is only 1 culvert for the central vehicle crossing the dimensions of which are shown below therefore only 16m of watercourse will be culverted. There are two pedestrian crossings (1 no. stepping stone and 1 no. flatbed bridge) that will not require culverts. The southernmost pedestrian / cycle crossing has been removed. The revised *Biodiversity Net Gain Report (February 2026)* has been prepared to correct this error.

“Raising the bed height, other than a potential enhancement, why is this required? How has this been measured as an enhancement and as it been assessed fully with geomorphology processes in mind? Are there better options that will be less damaging to the existing habitat.”

Further to liaising with civils - raising the bed height is not feasible due to positioning of outflow pipes. The *BNG Report* has been revised on that basis.

“Section 390 of hard and soft landscape specifications has been left blank, a request for further information on proposed geotextile fabric and planting details for bankside planting.”

Detailed hard and soft landscape specifications including bankside planting and geotextile details will be secured via condition. What has been provided is a General Landscape Strategy and indicative ‘planting palettes’.

Reference: Response to Environment Agency Comments

“Both the BNG report and EIA refer to a HMMP and LEMP and note to be read in conjunction with the BNG Report but have not been provided.”

This is a Reserved Matters application for Outline Application O/20/89498. The Habitat Monitoring and Management Plan and Landscape and Ecological Management Plan are not being provided as part of the Reserved Matters application. These documents will be provided upon discharge of Condition 65.

“The BNG report specifies “The Outline site wide OPP planning application was submitted before BNG became a statutory requirement. Therefore, each Reserved Matters (RM) development parcel planning application has a target of providing a BNG and not the now mandatory 10% BNG.” While this is not required for each parcel, it is detailed in the condition the development as a whole will provide overall net gain which is assumed to be the mandatory 10% as it is not specified. Further clarification is needed to show how net gain will be achieved for watercourses overall, and how many more sections of watercourse will be lost to culverting.”

The Statement Regarding Approach towards Biodiversity Net Gain at One Horton Heath (28 October 2024) provides a thorough explanation of the position for One Horton Heath on Biodiversity Net Gain. The development seeks to provide an overall net gain but is not required to demonstrate a 10% uplift.

The Reserved Matters parcels including Upper Acre are generally limited to developable areas where opportunities for BNG are more limited, however there are significant areas of green infrastructure across the site where the majority of BNG will be achieved. The majority of watercourses sit outside the Upper Acre site, within the green infrastructure and details of enhancement works for these areas will come forward in a separate application.

MoRPh5 surveys have been conducted on-site watercourses in Green Infrastructure and have shown that measures, notably including the removal of invasive species, have the potential to deliver significant BNG uplift.

Biodiversity Net Gain (as required by Policy DM11 – Nature Conservation of the EBC Local Plan), and the associated site-wide tracker, should be secured through the outline planning condition 71 (at an appropriate stage prior to commencement, as already detailed) and any subsequent condition(s) deemed necessary on the RM consent.

“The EMMP and EIA make initial reference to otter (*Lutra lutra*) but there is no evidence provided in these documents to demonstrate presence or lack of, and how current and post development impacts have been fully assessed.”

The *Ecological Impact Assessment* (February 2026) has been updated to refer to water vole and otter surveys that were undertaken in September 2025. This concluded there was no evidence of otter field signs along the watercourse.

Reference: Response to Environment Agency Comments

Please do not hesitate to contact the writer at this office if you require further information or have any further queries.

Sincerely,

Stantec UK Limited

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Planner

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Attachment: Ecological Impact Assessment (1793/Version V3.0; 9 February 2026)
Biodiversity Net Gain (BNG) Report (1791/Version 5.0; 10 February 2026)
Statutory Biodiversity Metric V3.0

cc. Ziyad Thomas (Eastleigh Borough Council – One Horton Heath Team)