



Land at Satchell Lane, Hamble-le-Rice

Supplementary Ecology Statement

Prepared by
CSA Environmental

on behalf of
Foreman Homes

Report Ref: CSA/3212/10

PI Ref: APP/W1715/W/22/3292580

LPA Ref: F/20/89488

October 2022

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Report Reference	Revision	Date	Prepared by	Approved by	Comments
CSA/5842/10	-	26/10/2022	MR	-	First issue
	-	28/10/2022	MR	-	Second issue



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1.0 INTRODUCTION

- 1.1 I am Mark Rose BSc (Hons) MSc MCIEEM, Associate Ecologist at CSA Environmental. My qualifications and experience are set out in my original Ecology Statement (CSA/3212/09). I am instructed by Foreman Homes ('the Appellant') in respect of appeal case APP/W1715/W/22/3292580, concerning Land at Satchell Lane, Hamble-le-Rice (the 'Appeal Site').
- 1.2 This supplementary statement provides an update for the Inquiry on:
 - 1) The intended strategy to avoid adverse effects on the New Forest protected sites as a result of recreation pressures, which in the absence of mitigation the Appeal Scheme may contribute toward
 - 2) The intended strategy to deliver an overall biodiversity net gain (of at least 10%) as part of the Appeal Scheme
- 1.3 This evidence has been prepared, together with my original Ecology Statement and the accompanying shadow Habitats Regulations Assessment (HRA) document (CSA/3212/07; **CD6.4**), to provide the necessary information on matters relating to European site protection and Biodiversity Net Gain, to inform the Inspector during their consideration of the Appeal Scheme. The applicable legal and policy frameworks are set out in my original Ecology Statement.

2.0 HABITATS REGULATIONS ASSESSMENT

- 2.1 I have produced a shadow Habitats Regulations Assessment (HRA) (CSA/3212/07; **CD6.4**) to assist the Inspector in their consideration of the implications of the Appeal Scheme for nearby European sites in view of their conservation objectives. Although not forming a reason for refusal, EBC's Statement of Case (**CD12.2**) records at paragraph 7.30 that the Council has now approved an Interim Mitigation Strategy (24 March 2022; **CD5.3**) in respect of the New Forest Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site and their vulnerability to recreation pressure.
- 2.2 As set out in my original Ecology Statement (CSA/3212/09), recent research has linked damaging recreation pressure at the New Forest sites to a 13.8km zone of influence. The Appeal Site falls within this catchment. Eastleigh Borough Council's Interim Mitigation Strategy (**CD5.3**) was approved in March 2022, to last for 5 years up to March 2027, while cross-boundary partnership work with other affected local authorities and Natural England progresses the development of a longer term, co-ordinated approach. The interim strategy is based on a package of providing Suitable Alternative Natural Greenspace (SANG) within Eastleigh Borough, and securing financial contributions from developers toward Strategic Access Management and Monitoring (SAMM) within the New Forest. The total contribution required toward SANG and SAMM is £1,161 per dwelling.

Use of the Interim Mitigation Strategy

- 2.3 In reference to the Interim Mitigation Strategy, in her Proof of Evidence, Rebecca Altman (Principal Planning Officer at EBC) states that, *"the level of mitigation land required within this strategy has been worked out to cover housing development as set out within the Adopted Local Plan, and the Council therefore prioritises use of the Strategy for policy compliant sites. The onus is on the appellant to confirm how these impacts will be addressed."*
- 2.4 The Appellant's position is that the Appeal Scheme is eligible to use the Interim Mitigation Strategy.
- 2.5 Firstly, the above extract contradicts previous advice from EBC, which suggests that the Appeal Scheme could be mitigated through EBC's Interim Mitigation Strategy (see Appendix A).
- 2.6 Secondly, the June 2019 EBC paper for the then emerging Local Plan, which sets out the approach being developed for the Interim Mitigation Strategy, clearly established the intention for the strategy to cater for windfall developments. Please refer to paragraph 5.1 of the extract provided at Appendix B. Furthermore, the adopted Interim Mitigation Strategy itself (**CD5.3**) makes no reference to capacity being reserved

for allocated development sites. The Cabinet Report documenting approval of the Interim Mitigation Strategy (Appendix C) provides costings of the strategic measures (£6,558,146). The Cabinet Report establishes that the strategy is based upon delivery of 5648 dwellings (therefore £1,161/dwelling) however it is unclear how this figure is arrived at.

- 2.7 I acknowledge that some of the strategic measures funded through the Interim Mitigation Strategy will have a finite capacity to address the effects of recreation at the New Forest. For example, funded SANG creation east of Allington Lane, and improvements to the Itchen Valley Country Park, can only be expected to divert/absorb a certain number of recreational visitors. However, as recorded in the evidence of Mr Brown, EBC are unable to demonstrate a 5 year housing land supply, and strategic mitigation capacity under the adopted interim strategy must surely therefore be allocated to developments successively, according to their delivery (i.e. a 'first come, first served' basis).

Natural England objection

- 2.8 Following issue of my shadow HRA, Natural England have issued a letter of objection (13 October 2022; Appendix D). In this letter, Natural England advise that it is not possible to conclude that the Appeal Scheme will have no adverse effect on the integrity of the New Forest designations. This stems from concerns held by Natural England over various elements of the Interim Mitigation Strategy, *"including the reduced provision of Suitable Alternative Natural Greenspace (SANG), the lack of information on increasing visitor capacity at the Itchen Valley Country Park and lack of an accompanying monitoring strategy."*
- 2.9 It is firstly important to clarify that this represents an objection not to the Appeal Scheme per se, but to all development under EBC's Interim Mitigation Strategy. As set out in my original Ecology Statement, this extends to *all* new residential development across the significant majority of Eastleigh (see **CD5.4**). Natural England's letter raises no further concerns with any aspect of the shadow HRA.
- 2.10 Secondly, the Interim Mitigation Strategy has already been found sound through the adoption of the EBC Local Plan 2016-36 (**CD4.1**). Policy DM11 of the adopted Plan states as follows:

"The Council will work with PfSH, Natural England, the Environment Agency and other wildlife organisations to develop and implement with developers a strategic approach to the protection and enhancement of international and European sites from the direct and indirect effects of development. Within Eastleigh Borough this will include...the interim and any future New Forest Recreation Mitigation Strategy if required; or alternative agreed site specific measures to address recreational disturbance."

- 2.11 During examination, a HRA Addendum for the Final Main Modifications was produced (Urban Edge, 2022), which recorded the adoption of the Interim Mitigation Strategy in March 2022. At paragraph 31 of the Inspector's Final Report (**CD5.1**), they determined that:

"The Plan was subject to a Habitats Regulations Assessment (HRA) during its preparation and was subsequently updated to address the proposed MMs as required by the relevant Regulations. The HRA concludes that the Plan would not affect the integrity of designated sites provided that certain mitigation measures are carried out... In reaching this conclusion, I have also had due regard to the responses received in relation to the MM consultation exercise. As a result, I am satisfied that the relevant legal requirements have been met and that the Plan can therefore be adopted in compliance with the Conservation of Habitats and Species Regulations 2017."

- 2.12 Eastleigh Borough Council have confirmed they are working with Natural England to resolve their concerns over the Interim Mitigation Strategy (Appendix A), and for this reason my original Ecology Statement acknowledged that the final financial contribution required for the Appeal Scheme may increase from that calculated in the shadow HRA.

Alternative strategy

- 2.13 In light of the foregoing, I conclude that the Appeal Scheme is eligible to use the Interim Mitigation Strategy, and that use of this strategy provides the Inspector with sufficient evidence to conclude that the Appeal Scheme will have no adverse effect on the integrity of the New Forest sites. However, should the inspector be minded to agree with EBC (that the Appeal Scheme is not eligible for the Interim Mitigation Strategy) or with Natural England (that all development under the interim strategy, including the Appeal Scheme, may have an adverse effect on the integrity of the New Forest sites), then the Appellant's alternative solution would be to directly fund strategic mitigation at the New Forest administered by the Natural Park Authority (NPA). As set out in my original Ecology Statement, this approach has been advocated elsewhere by Natural England for development within 13.8km of the New Forest designations, where the applicable Local Planning Authority has not yet adopted a Natural England approved mitigation strategy. The National Park Authority have confirmed that contributions have been collected by other planning authorities, and that their Policy Manager will be meeting with these authorities to discuss a system for the transfer and appropriate allocation of these resources (**Appendix E**).
- 2.14 Clearly, if the above strategy were judged necessary, the level of financial contributions would need to exceed the £1,161/dwelling rate on which EBC's Interim Mitigation Strategy is based. In order to be highly precautionary, as visitors from Eastleigh would necessarily cross Test Valley to reach the New Forest sites, it is proposed that the mitigation

contribution set out in Test Valley Borough Council's (TVBC) consultation draft SPD (2021; Appendix F) of £1,540/dwelling be adopted (an increase on the £1,300/dwelling under TVBC's adopted 2014 Interim Framework). The need for monitoring has been factored into this sum; the absence of which was one of Natural England's concerns with EBC's Interim Mitigation Strategy. Under this approach, the total financial contribution payable by the Appellant toward strategic mitigation of in combination recreation pressures at the New Forest sites would be £93,940.

3.0 BIODIVERSITY NET GAIN

- 3.1 As set out in my original Ecology Statement (CSA/3212/09), biodiversity net gain did not form a reason for refusal of the application. The Appellant is however committed to delivering a net gain of at least 10% (i.e. in excess of existing legal or policy requirements).
- 3.2 My original statement provided the results of an assessment of the projected net change in biodiversity on-site, using Biodiversity Metric 3.1, based upon a condition assessment of baseline habitats and the submitted Illustrative Landscape Plan. The assessment found that the Appeal Scheme would be expected to result in a net loss of 12.58 Habitat Units (equating to -59.64%).
- 3.3 The Appellant seeks to maximise public benefits of the Appeal Scheme, in terms of new housing to meet the recognised shortfall, at the Appeal Site which is considered to be in a sustainable location for development. The submitted layout confines unit losses to habitats of least distinctiveness (modified grassland), therefore the only realistic means of achieving biodiversity net gain on-site would be a commensurate reduction in built area; with corresponding reduction in realised public benefit. As such, the Appellant is sourcing a suitable off-site habitat creation and enhancement scheme, to be funded by the Appellant, to allow the Appeal Scheme to deliver an overall net gain in biodiversity.
- 3.4 It is notable that a recent study by zu Ermgassen *et al.* (2021) has found that in a sample of BNG assessments from six early-adopter Councils, 95% of the biodiversity units came from habitats within or directly adjacent to the development footprint. Concerns were expressed about the absence of a credible system to monitor and enforce delivery of on-site gains. These concerns have led to some strong advocates for the co-ordinated delivery of biodiversity net gain on off-site land where there is considered to be better opportunity to control and enforce management, and where the Lawton principles of 'bigger, better and more joined up' wildlife areas are more likely to be realised. Whilst seeking to maintain and where possible enhance land within development schemes is clearly desirable, this research points to some of the potential benefits of providing good offset sites.
- 3.5 In order to deliver an overall biodiversity net gain of at least 10%, the Appellant will fund the creation of off-site units at the Keyhaven Natural Capital Scheme; a joint venture partnership between Belport and the Hampshire and Isle of Wight Wildlife Trust. The offset site covers an area of c. 375 acres in the south of the New Forest National Park, which currently supports intensive agriculture, and under the scheme will be transformed to native, species rich grasslands and lowland meadows; with dedicated management by the Wildlife Trust secured for the next

130 years. A letter of intent from Belport, confirming the availability of biodiversity units for the Appeal Scheme, is provided at Appendix H.

- 3.6 The principle of the Keyhaven Natural Capital Scheme is supported by Natural England (Appendix I). At the time of writing, legal agreements are under review by the New Forest District Council and National Park Authority. The final details of specific habitat creation measures to be undertaken at the site as part of mitigation for the Appeal Scheme can be secured through condition. In Part 3 of their most recent consultation exercise (January 2022) on the practical and legal implementation details pertaining to biodiversity net gain (extract at Appendix G), DEFRA gave clear recognition of the distinction between 'biodiversity gain information', required at the application stage, and a complete 'biodiversity gain plan', required pre-commencement. In the present case, the biodiversity gain information is provided here, in my original Ecology Statement and the submitted Illustrative Landscape Strategy (**CDA.13**). In Natural England's letter to EBC of 13 October 2022 (Appendix D) they welcome the completion of the Biodiversity Net Gain Assessment and recommend that a condition be used to secure a Biodiversity Mitigation and Enhancement Plan (BMEP) as one method to ensure a net gain is achieved.

4.0 CONCLUSION

- 4.1 The accompanying shadow HRA sets out all necessary information for it to be ascertained that, with implementation of the proposed measures intended to avoid or reduce adverse effects, the Appeal Scheme will have no adverse effect on the integrity of any European site, either alone or in combination with other plans or projects. The Appeal Scheme is eligible to draw upon EBC's adopted Interim Mitigation Strategy for the New Forest, which has been found sound through the examination of the Local Plan.
- 4.2 Separately, the Appellant is committed to delivering an overall biodiversity net gain of at least 10%. This will be achieved by minimising losses and maximising gains on-site, where possible, and funding the creation of additional habitat units off-site at the Keyhaven Natural Capital Scheme, to be managed by the Hampshire and Isle of Wight Wildlife Trust. The Appeal Scheme will therefore deliver in excess of policy requirements.

5.0 REFERENCES

Department for Environment, Food & Rural Affairs, 2022. *Consultation on Biodiversity Net Gain Regulations and Implementation*. January 2022.

Eastleigh Borough Council, 2022. *Eastleigh Borough Local Plan (2016-2036)*. Adopted April 2022.

zu Ermgassen, S. O. S., E., Marsh, S., Ryland, K., Church, E., Marsh, R., Bull, J. (2021). *Exploring the ecological outcomes of mandatory biodiversity net gain using evidence from early-adopter jurisdictions in England*. *Conservation Letters*. e12820.

Test Valley Borough Council, 2014. *New Forest SPA Mitigation – Interim Framework*. Annex to Cabinet Report - 1st October 2014.

Test Valley Borough Council, 2021. *New Forest International Nature Conservation Designations: Recreational Mitigation Framework Supplementary Planning Document*. Consultation draft; November 2021.

Urban Edge, 2022. *Habitats Regulations Assessment for the Eastleigh Borough Local Plan 2016-2036: HRA Addendum for the Final Main Modifications*. April 2022

Appendix A

Rebecca Altman email 26/09/2022

From: [Altman, Rebecca](#)
To: [Mark Rose](#); [Steven Brown](#)
Cc: [Parker, Nicholas](#); [Luke Vallins](#); [Steve Carrington](#); [Andy Gibbs](#); [Graham Ritchie](#); [Yvonne Warren](#); [Martin, Clare](#); [Morris, Rachael](#)
Subject: RE: SATCHEL LANE APPEAL - SHADOW HRA
Date: 26 September 2022 13:46:12
Attachments: [image011.png](#)
[image012.png](#)
[image013.png](#)
[image014.png](#)
[image015.png](#)
[image016.png](#)
[image017.png](#)
[image235358.png](#)
[image890840.png](#)
[image162496.png](#)
[image466468.png](#)
[image405489.png](#)
[image010790.png](#)
[Natural England comments on appeal 27 May 2022.pdf](#)

Dear Mark

Thank you for providing an updated Shadow HRA, confirming an alternative mitigation scheme for nitrates.

With regard to the New Forest, whilst we could potentially offer mitigation through the Council's Strategy, I would note that Natural England continue to raise concerns about this strategy. Whilst the Council is working with Natural England to resolve their queries, there is the potential that Natural England could raise objection. Please see attached comments that we received from Natural England earlier this year for reference.

I believe there is an option to pay directly to the New Forest for mitigation, which you may wish to consider as an alternative.

Please let me know if you would like us to send the current Shadow HRA on to Natural England in the meantime.

Kind regards,

Rebecca

Rebecca Altman
Principal Planning Officer

Working days - Wed-Fri
023 8068 8266



Eastleigh Borough Council | Eastleigh House | Upper Market Street | Eastleigh | SO50 9YN



From: Mark Rose <mark.rose@csaenvironmental.co.uk>
Sent: 23 September 2022 17:19
To: Steven Brown <S.brown@woolfbond.co.uk>; Altman, Rebecca <rebecca.altman@eastleigh.gov.uk>
Cc: Parker, Nicholas <nicholas.parker@eastleigh.gov.uk>; Luke Vallins <Luke.Vallins@foremanhomes.co.uk>; Steve Carrington <Steve@foremanhomes.co.uk>; Andy Gibbs <Andy.Gibbs@foremanhomes.co.uk>; Graham Ritchie <g.ritchie@woolfbond.co.uk>; Yvonne Warren <Y.Warren@woolfbond.co.uk>
Subject: RE: SATCHEL LANE APPEAL - SHADOW HRA

Dear Rebecca

With apologies for not having responded sooner, I attach here a revised copy of the shadow HRA.

As the Council cannot guarantee availability of nitrogen credits, the appellants have secured capacity from the third party scheme at Meon Springs to ensure nutrient neutrality, with details included attached.

On the other hand, clearly the New Forest recreation mitigation sits in a different category and indeed the interim strategy specifically makes allowance for windfall developments. I therefore assume the appeal scheme, if permitted, would fall under the interim strategy.

Best regards

Mark

Mark Rose BSc MSc PGDip MCIEEM
Associate Ecologist



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urban design | ecology | landscape | heritage



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From: Steven Brown <S.brown@woolfbond.co.uk>
Sent: 16 September 2022 17:14
To: Altman, Rebecca <rebecca.altman@eastleigh.gov.uk>; Mark Rose <mark.rose@csaenvironmental.co.uk>
Cc: Parker, Nicholas <nicholas.parker@eastleigh.gov.uk>; Luke Vallins <Luke.Vallins@foremanhomes.co.uk>; Steve Carrington <Steve@foremanhomes.co.uk>; Andy Gibbs <Andy.Gibbs@foremanhomes.co.uk>; Graham Ritchie <g.ritchie@woolfbond.co.uk>; Yvonne Warren <Y.Warren@woolfbond.co.uk>
Subject: RE: SATCHEL LANE APPEAL - SHADOW HRA

Thanks Rebecca

I am at an inquiry next week, but I will leave for Mark to liaise with you direct.

Thanks

Best wishes

Steven Brown BSc Hons DipTP MRTPI

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From: Altman, Rebecca <rebecca.altman@eastleigh.gov.uk>
Sent: 16 September 2022 17:12
To: Steven Brown <S.brown@woolfbond.co.uk>
Cc: Parker, Nicholas <nicholas.parker@eastleigh.gov.uk>
Subject: RE: SATCHEL LANE APPEAL - SHADOW HRA
Importance: High

Steven

Thank you for sending the Shadow HRA. I have only had a brief look through the document, and I note that you are seeking to mitigate the nitrate impact and New Forest Impacts by contributing to EBC's mitigation schemes.

In the Council's Statement of Case, and as agreed in the Statement of Common Ground (para. 2.18), we explained that other mitigation measures would need to be sought as we cannot guarantee availability of credits through the Council schemes. This is a fundamental issue that we need to discuss. I am happy to set up a meeting next week noting my working days of Wednesday to Friday. Please let me know any dates/times that would suit you best.

Rebecca

Rebecca Altman
Principal Planning Officer

Working days - Wed-Fri
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Eastleigh Borough Council

From: Steven Brown <S.brown@woolfbond.co.uk>
Sent: 16 September 2022 16:52
To: Altman, Rebecca <rebecca.altman@eastleigh.gov.uk>
Cc: Mark Rose <mark.rose@csaenvironmental.co.uk>; Graham Ritchie <g.ritchie@woolfbond.co.uk>; Yvonne Warren <Y.Warren@woolfbond.co.uk>; Luke Vallins <Luke.Vallins@foremanhomes.co.uk>; Andy Gibbs <Andy.Gibbs@foremanhomes.co.uk>; Steve Carrington <Steve@foremanhomes.co.uk>
Subject: SATCHEL LANE APPEAL - SHADOW HRA

Afternoon Rebecca

I refer to the above and attach the shadow HRA for your perusal. Comments welcome.

I would be grateful if you could also issue to Natural England for their comment also.

Thanks

Best wishes

Steven Brown BSc Hons DipTP MRTPI

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Appendix B

EBC 2019 Local Plan Paper on IMS (extract)



Eastleigh Borough Local Plan 2016-2036



Eastleigh Borough Local Plan 2016-2036

Interim New Forest Recreation Mitigation

June 2019



1. Overview

- 1.1 This paper sets out a technical approach to address disturbance in the New Forest from new development in Eastleigh borough. It provides an officer viewpoint to be finalised following further discussions and the findings of ongoing research.
- 1.2 The Eastleigh Borough Local Plan will deliver approximately 14,580 dwellings within c.20km of the New Forest. In order to ensure the delivery of this development, it is a legal requirement that the habitat regulations are met and that a precautionary approach is taken which is beyond reasonable scientific doubt. As set out in the Habitats Regulation Assessment (HRA), in the absence of avoidance and/or mitigation measures, this level of residential development is likely to have an adverse effect on the New Forest. This is through the increase in the number of visitors to the New Forest SPA/SAC/Ramsar (New Forest protected areas) in the presence of ground nesting birds which can easily be disturbed by people and dogs.
- 1.3 The Council is part of a partnership of local authorities within and adjacent to the New Forest and also involving Natural England who are addressing this issue; initially updating the evidence base and then developing a mitigation strategy. This research is being funded by a grant from the Planning Delivery Fund. The emerging Local Plan includes the commitment to deliver this mitigation strategy. Where possible, the Council will secure Government funding in order to deliver the improvements required. Much of the development in the Local Plan either has planning permission or will not come forward before the full strategy is in place, however the Council is working on an interim solution to address potential impacts before the full strategy is finalised.
- 1.4 Initial findings from the research (see appendix) demonstrate that most people surveyed from Eastleigh borough had visited the New Forest in the past year and most visitors from the borough visit once a month or less frequently. Across the study area, the proportion of people visiting the New Forest, and the number of visits, declines the further people live from the New Forest with people close by visiting more frequently than people in Eastleigh borough. These findings indicate that any disturbance from residents in Eastleigh borough is relatively small in comparison to residents living closer to the New Forest. Therefore it will be important to ensure that the mitigation measures attributable to Eastleigh development are kept in proportion to the level of impact.
- 1.5 The partnership will develop an effective and proportionate package of measures and consider the most appropriate way to fund this. Within Eastleigh borough, the provision of new and enhanced green open spaces and routes can provide open spaces and routes in people's immediate neighbourhoods and providing an attractive alternative to driving to the New Forest. Within the New Forest, access management measures such as changes to car parks, way-marking and improvements to routes may be appropriate to direct people to non-designated areas. Face to face contact, communications, education and events can help promote responsible recreation whilst visiting designated areas.
- 1.6 This interim strategy will initially prioritise the investment in delivering new, and improving existing, open spaces and routes in Eastleigh borough. This may be through improved facilities to make country parks useable throughout the year and increase their attractiveness to specific users such as dog walkers. Improvements to strategic routes may increase the scope for longer walks and opening up access to landscapes and open spaces such as the South Downs.

2. Issues

- 2.1 The Eastleigh Borough Local Plan Habitats Regulation Assessment Update (October 2018) discussed the issue of human disturbance including recreational disturbance in the New Forest protected areas. This reported that ground and near-ground nesting birds such as Dartford Warbler, Nightjar and Woodlark are particular receptors of negative effects of disturbance. Research findings elsewhere have shown lower breeding success due to disturbance. For Nightjars, a negative relationship has been observed between the proximity of housing and the size of their population. For Dartford Warblers, birds in heavily disturbed areas delayed the start of their breeding, preventing multiple breeds. Most of this disturbance was from dogs running through vegetation after sticks. The HRA also reported findings showing that the removal of human disturbance resulted in an increase of between 13% and 48% in the breeding population of Woodlark in heathland sites.
- 2.2 The Eastleigh Borough Local Plan provides for approximately 14,580 dwellings within 20km of the New Forest. Although the New Forest is relatively inaccessible by road or rail from the southern parts of the borough, the nearest parts of the borough, Eastleigh and Chandlers Ford, are approximately 12-13km away. In the absence of avoidance and/or mitigation measures, development in the borough is likely to increase the number of visitors to the New Forest and adversely impact the breeding populations of Nightjar, Woodlark and Dartford Warbler. In order to address this impact, the Local Plan commits the Council to implementing mitigation measures identified in the emerging mitigation strategy (paragraph 5.57 and policy DM11 in the Submission Local Plan 2016-36). This will be informed by the research being undertaken by Footprint Ecology which is due to be finalised by the end of this year. This will help determine the impact from the new development in the borough and the appropriate mitigation to address this impact. The Council is working on an interim strategy to be implemented until the full strategy is finalised.

3. Current mitigation

- 3.1 Mitigation strategies are in place elsewhere to address the impact of recreation arising from new development within and close to the National Park. Strategies are currently in place for the New Forest National Park Authority, New Forest District Council (which covers areas outside the National Park) and for Test Valley Borough Council (the New Forest protected areas extends into the south west corner of the borough). They are proportionate approaches based on the number of visits generated from development and measures needed to address the impact. These involve the provision and enhancement of alternative non-designated areas, access and visitor management measures and monitoring.
- 3.2 The New Forest National Park Authority draft Revised Habitat Mitigation Scheme 2018 replaces the initial mitigation scheme 2012. This calculates the contributions required to fund the mitigation measures during the Plan period and in perpetuity covering access management, alternative sites and routes, education, awareness and promotion, monitoring and research and implementation. It applies a standard developer contribution to all new residential development irrespective of dwelling size.
- 3.3 New Forest District Council adopted a mitigation strategy for European sites in 2014 and consulted on a review of the strategy in 2018. This sets out the broad approach to mitigation and identifies projects to be funded. It seeks development contributions

from every net additional dwelling and the contributions required varies by the size of dwelling and size of development (either below or above 50 dwellings). Mitigation measures include the improvement of greenspace in the district, and the direct employment of an additional ranger resource within the National Park.

- 3.4 Test Valley Borough Council seek development contributions towards habitat mitigation measures under its Interim Mitigation Framework (2014). This applies to development within 13.6km of the New Forest protected areas. This is the distance from where a likely significant effect is anticipated (where 75% of existing visitors to the areas of the New Forest closest to Test Valley travel from). The contributions reflect the cost of purchasing land and implementing the works required for SANGS.
- 3.5 The local authorities and environmental bodies within the Solent sub-region have a history of working together to address recreational disturbance. The Council is a member of the Solent Recreation Mitigation Partnership addressing impacts from new development on the coast. Following research on the extent of the issue, the partnership developed the Bird Aware programme that collects contributions to fund rangers, infrastructure improvements and communication tools.
- 3.6 For areas within 5.6km of the Solent coastline, the New Forest mitigation is in addition to developer contributions collected to address recreational impact from new development on the Solent Special Protection Areas. These contributions fund the Bird Aware Solent programme which improves infrastructure and increases awareness through ranger provision and face to face engagement, SANGS, site specific improvements and a range of communication tools. The contributions are on a sliding scale based on bedroom numbers ranging from £346 for a one bedroom property to £902 for a property with five or more bedrooms, as set out in the Solent Recreation Mitigation Partnership Strategy approved in December 2017.

4. Existing evidence for Eastleigh

Survey of Recreational Visits to the New Forest National Park (Tourism South East 2005)

- 4.1 The Tourism South East research (2005) was the last comprehensive survey of users of the New Forest and involved on-site surveys at 62 locations and around 2,200 phone interviews. It was commissioned to inform work on the newly designated National Park and sought to identify the profile of visitors to the New Forest, characteristics of their visits, reasons why people chose to visit and their economic impact. The primary data collection included both on-site and telephone surveys (although this did not extend to Eastleigh borough). In its analysis visitors were categorised into local day visitors from home within 5 miles and other day visitors from home; Staying visitors (including staying with friends or relatives); and Holidaymakers.
- 4.2 The research found that 60% of visitors surveyed on site were day visitors from home, 40% were on holiday staying either within the New Forest or elsewhere. Of the day visitors, the majority (35%) were local from within 5 miles of the National Park boundary and made an average of 257 recreational visits during the previous 12 months. The remaining 25% were from further afield (which covers visitors from Eastleigh borough) and averaged 45 recreational visits during this time. The percentage of local visitors increased in off-peak months. Residents of Southampton, Eastleigh and Chandler's Ford combined comprised 7% of all visitors and 28% of other day visitors from home (from further than 5 miles).

- 4.3 In the on-site surveys, visitors were asked what they particularly liked about the location visited. The scenery, landscape and views were most frequently mentioned, followed by peace & quiet/not too crowded; good for walking; wildlife, birds and animals; easy to get to/close to home; and good for dog walking.
- 4.4 The telephone survey did not cover Eastleigh borough. However the overall findings of the survey are relevant to the borough. The survey found that 75% of respondents from major urban catchments outside the New Forest had visited the New Forest for leisure / recreation in the previous 12 months, on average just over once a month. For households located in major urban catchment areas, the majority of the locations which were visited most frequently were outside the European sites. Lyndhurst, Brockenhurst, Burley, Beaulieu and Lymington were the most frequently visited locations by this category of visitors. These five locations comprised 60% of the locations stated. Locations within the European sites comprised only 12% of all identified locations (although it is recognised that many New Forest towns are within easy walking distance of European sites). This compares with households living in areas bordering the National Park where 32% of locations mentioned were within the European sites (NFDC Draft Mitigation SPD, June 2018).
- 4.5 For non-local day visitors from major urban catchments, walks were the main reasons to visit the New Forest for 47% of households. Although visiting a pub, café or tea room was the primary reason for only 10% of visits, it was the secondary reason given by over three quarters of respondents. Relaxing/enjoying views/picnicking; and walking the dogs were the primary reasons each given by 9%.

Interim results from the Footprint Ecology work (2018/19)

- 4.6 In March 2018, the Government awarded a Planning Delivery Fund grant for research on recreational pressure on the New Forest from new housing development. This was awarded to a partnership of local authorities led by Test Valley Borough Council and also involving Natural England. The partnership appointed Footprint Ecology to undertake the research required. This will form the basis for a strategic approach to mitigation from local authorities close to the New Forest to prevent adverse effects on the SAC/SPA/Ramsar sites.
- 4.7 The research being undertaken by Footprint Ecology will update the Tourism South East survey and the overall evidence base. The primary data involves telephone and on-site surveys and car park counts. As the Tourism South East telephone survey did not extend as far as Eastleigh borough, this research will help determine to the extent of the impact from residential development within the borough.
- 4.8 The Footprint Ecology telephone survey ran from November – December 2018 and the on-site surveys (interviews and car park counts) have taken place since October. The on-site surveys are taking place at different times of day, weekdays and weekends and school holiday and non-holiday times. They will continue into the summer holidays and include the August Bank Holiday weekend. The telephone survey asked interviewees whether they had visited in the past 12 months, how this compared to other greenspaces, how often they visited and the activities undertaken.
- 4.9 The Footprint Ecology telephone surveys are the first outputs of the Footprint Ecology work (see appendix). A total of 2,000 surveys were completed, of which 138 were in Eastleigh borough. Out of these 138 respondents, around two thirds had visited the New Forest heaths and woods in the past 12 months. The key findings applicable to Eastleigh borough are:

- i. the majority of Eastleigh residents had visited the New Forest heaths and woods in the past year;
- ii. the proportion of people visiting the New Forest, and the number of visits, declines the further people live from the New Forest;
- iii. the most common frequency of visits from people living 10-25km away was less than once a month (2-5 visits), followed by once a month (6-15 visits);
- iv. walking was the most commonly cited activity by all interviewees, other commonly cited activities included dog walking. The proportion of dog walking generally declines with distance however dog walkers tend to visit more frequently than other users;
- v. the proportion of visits to the New Forest as opposed to other greenspace locations decreases with distance.

5. Potential number of visits to be mitigated

5.1 Much of the development proposed in the Eastleigh Borough Local Plan already has planning permission and therefore the issue of the impact on the New Forest protected areas will have been resolved. The number of allocations in the Local Plan which do not have planning permission is 6,710 dwellings. With the addition of allowances for small sites and for windfall developments, the total number is 8,250 dwellings (after delivery discounts have been applied).

5.2 The estimated number of visits from Eastleigh residents to the New Forest protected areas are as follows:

No. of new homes in the Local Plan (without planning permission): 8,250 dws

Estimated average number of visits by Eastleigh residents by year: 25

Proportion who had visited the New Forest in previous year: 64%

Estimated number of visits to the New Forest from new households in new development (without planning permission) = 132,000 (8,250 x 25 x 64%)

Estimated proportion to locations within the SPA/SAC/Ramsar = 12%

Additional recreational visits to New Forest SPA/SAC/Ramsar locations per year from households in new development (without planning permission): 15,840 visits (132,000x12%)

5.3 If all the housing numbers are mitigated the estimated number of visits from Eastleigh residents to the New Forest protected areas is as follows:

No. of new homes in the Local Plan: 14,580 dwellings

Estimated average number of visits by Eastleigh residents by year: 25

Proportion who had visited the New Forest in previous year: 64%

Appendix C

EBC New Forest Mitigation Cabinet Report

CABINET

Thursday, 24 March 2022

STRATEGY FOR SUITABLE ALTERNATIVE NATURAL GREEN SPACE

REPORT OF THE STRATEGIC PLANNING MANAGER

Recommendation:

It is recommended that:

1. Cabinet approves an interim strategy at Appendix 1 involving creating Suitable Alternative Natural Green Space (SANG) and financial contributions towards the management of visitor pressures as mitigation of the impacts of the Borough's increasing householder population on the New Forest National Park;
 2. Cabinet approves the allocation of land east of Allington Lane totalling 14.3 hectares for the delivery of a new SANG, subject to the necessary planning approvals;
 3. Cabinet approves the proposed developer contribution of £1,161 per dwelling to fund the implementation of the interim strategy.
 4. Cabinet delegates an annual review of the developer contribution to the Executive Head of Environment in consultation with the Leader of the Council (as Cabinet Member for Planning and Property).
-

Summary

Increased development leads to a number of environmental and other impacts which need to be mitigated to minimise harm. One of these impacts is from recreational pressures causing erosion and disturbance on the internationally protected New Forest Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar sites.

While Eastleigh Borough Council does not border the New Forest National Park, technical research commissioned by local authorities in and around the New Forest shows that residents of the Borough choose to visit the area from time to time and thus risk contributing towards erosion of the habitats and disturbance of the species they support. Mitigation is required to avoid significant adverse effects on the protected sites and species and to enable planning permissions to be granted, to support wider housing delivery objectives.

In September 2021 the Cabinet approved the principle of a package of mitigation measures to mitigate the impact. This paper sets out an interim strategy to address the

impact of new development until March 2027. It is based on the delivery of proportionate Suitable Alternative Natural Green Space (SANG) in the Borough to divert recreational pressures away from the New Forest protected areas, and financial contributions to managing the impact of those visitors that nevertheless will still choose to visit them. The SANG strategy will be focused on a new publicly accessible SANG on the One Horton Heath project site and adjoining former farmland to the north of Itchen Valley Country Park and improvements to the existing Itchen Valley Country Park. It will be funded by a contribution from all new residential development permitted in the Borough.

Statutory Powers

The Conservation of Habitats and Species Regulations 2017 as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019

Town and Country Planning Act 1990

Strategic Implications

1. The decision in this report supports the Green Infrastructure, Housing and Health and Wellbeing objectives in the Corporate Plan 2015-2025. It also supports the aims of the Climate and Environmental Emergency Action Plan by protecting important habitats.
2. The Council's Corporate Strategy (Housing) (2018) includes the aim of ensuring there is a planned housing supply to meet residents' requirements for new housing in the Borough. Policy DM11 in the emerging Local Plan commits the Council to implement a mitigation strategy to address the impact on the New Forest protected sites.

Introduction

2. Local Planning Authorities have a legal duty through the Conservation of Habitats and Species Regulations (2010) as amended (known as the Habitat Regulations) to ensure that development does not have an adverse effect on designated sites supporting internationally important species and habitats. This includes Special Protection Areas (SPAs) which are designated for certain bird species they support and Special Areas of Conservation (SACs) and Ramsar sites which are designated for their habitat. A large proportion of the New Forest is designated as SAC, SPA and Ramsar sites (referred to in this report as the 'New Forest protected sites').
3. Recent research has defined a catchment area from within which 75% of visits to the New Forest protected sites originate. This catchment includes most of Eastleigh Borough. This research provides evidence for the first time that there is a potential impact from residents of new development in the Borough visiting these sites.
4. The Council has been working in partnership with adjoining authorities, Natural England, the Forestry Commission and other wildlife organisations on

a strategic approach to address increased recreational impacts associated with new residential development within the catchment of the protected sites. Until this strategic approach is delivered, an interim mitigation package is required for Eastleigh to provide a way forward in considering planning applications.

Background

5. The Council has recently undertaken a programme of land acquisition as part of its environmental and ecological strategy and as part of solar farm proposals. Areas of land have been purchased to address issues relating to biodiversity net gain, nitrates, phosphates, tree planting and woodland creation, solar energy and the impact of recreation on the New Forest protected sites. This has required close working between different teams in the Council including Planning, Ecology, the Countryside Service, Asset Management and Project Management and this will continue as the strategy is implemented.
6. This proactive approach enables the Council to develop a comprehensive approach across the Borough and to consider opportunities for land uses which meet a number of sustainability objectives. It provides a strategy for developers to contribute to and does not rely on developers' on-site provision to address strategic issues which often require a larger land area than can be accommodated on individual development schemes. This strategy will enable development to continue within the Borough whilst mitigating its environmental impact.
7. Natural England has advised the Council that there is a likely significant effect from any additional residential development within the Borough on the New Forest protected sites based on additional visits from residents of new residential development. This is significant enough that objections are being raised by Natural England to all planning applications for new dwellings until satisfactory mitigation measures are put in place. Policy DM11 in the Emerging Local Plan commits the Council to implement a mitigation strategy to address the impact on the New Forest protected sites. This report seeks Cabinet approval for an interim strategy containing a package of mitigation measures for the impacts of new residential development in the Borough.
8. The Council has been working in partnership with adjoining authorities, Natural England, the Forestry Commission and other wildlife organisations on a strategic approach to address recreational impact. The first phase of this work created an evidence base on the visits undertaken to determine where visitors came from and why they visited. Around two thirds of Eastleigh Borough residents surveyed reported that they had visited New Forest protected sites in the last 12 months. The research found that across the whole area surveyed the visit rate per household declines dramatically with distance from the protected sites especially over the first few kilometres and the impact of each additional new house declines with distance. Eastleigh households made between 40-50% fewer visits than the average of all households within a 25-kilometre distance (an average of 25 visits per annum compared to 48 visits per annum across the area).

9. The partnership is considering how to progress this work to agree a strategic approach and the structures needed to implement strategic measures. Some of the local authorities involved in the partnership have full mitigation strategies already in place including the New Forest National Park Authority. The approach will therefore need to address existing strategies and provide a proportionate solution to reflect the different levels of impact across the partnership area. Until this strategic approach is delivered, an interim mitigation package is required for Eastleigh to provide a way forward in considering planning applications. The interim strategy addresses impact to March 2027 to provide sufficient time for the wider strategic framework to be agreed, to undertake additional monitoring and surveys and in order to demonstrate the deliverability of the measures identified. The full strategy will refine the approach and the costings and will consider the effectiveness and delivery of measures from the interim strategy.

Interim strategy

10. Council officers have had ongoing discussions with Natural England while developing a package of mitigation measures to address impacts of new residential development within the Borough. The interim strategy involves two components; the delivery of Suitable Alternative Natural Greenspace (SANG) within the Borough to provide an attractive local alternative to visiting the designated sites, and financial payments to the New Forest National Park Authority. This will fund Strategic Access Management and Monitoring (SAMM) of visitors who still choose to visit the designated sites.
11. Research has shown that 75% of all day visitors to the New Forest protected sites come from within a zone of 13.8km around the boundaries and therefore that all further residential development within this catchment zone is likely to have significant adverse effects on the designated sites. This includes most of Eastleigh Borough which generally falls between the 5-10 and 10-15km zones. The interim strategy will therefore apply to residential development within this catchment zone (i.e. up to 13.8km), shown in Appendix 2. This includes residential development that requires Reserved Matters approval.
12. There may be an impact from larger developments (covered by the Environmental Impact Assessment regulations) within the 13.8km-15km zone and applications for these should be screened to consider whether mitigation is required. There is also a potential impact from other development such as new hotels and development in C2 Use Class (residential institutions). This development is not covered by this interim strategy and proposals within the 13.8km catchment zone (and larger EIA development within 15km) will be assessed on a case by case basis.
13. One option discounted was for developers to pay contributions entirely to the New Forest National Park Authority to employ further rangers, for more land management and for the education of users directly in the National Park. It is considered more beneficial however, both to the National Park and to the Council's residents and businesses, if recreational activity can predominantly remain in Borough and so avoid impact on the New Forest. In addition to enabling new residential development to come forward, development of

SANG within the Borough would have a significant economic and health benefit for all Borough residents. Dedicated recreational green space encourages healthier lifestyles, helps to minimise travel outside of the Borough and boosts the local economy.

14. It is therefore recommended that Cabinet approve an interim strategy that includes seeking developer contributions for:
 - (a) The creation and ongoing maintenance of 27.1 hectares of SANG within the Borough made up of 14.3 hectares of new SANG land on Allington Lane and improvements to Itchen Valley Country Park; and
 - (b) The funding of the equivalent of one full-time ranger post in the New Forest National Park until March 2027 to address the impact of the residents from new development in the Borough who will wish to continue to visit the New Forest because of its special landscapes and wildlife.
15. The map at Appendix 3 shows the relationship between the area of proposed SANG land at Allington Lane and Itchen Valley Country Park, together with other land parcels currently in the Council's ownership.
16. Land east of Allington Lane that is part of the One Horton Health (OHH) development is currently considered open space and not required for development, and is therefore available for use as SANG. This is subject to full determination of land usage to ensure that the Council can bring forward this development. The OHH Project team have advised of the possibility of parts of this land being required for uses including to create a landscape buffer zone adjacent to residential development or wetland creation in order to mitigate nutrient impacts of development. If the amount of SANG being created in this area decreases, the Council will identify equivalent alternative locations for SANG creation in accordance with the strategy.
17. The total developer contribution required is £1,161 per dwelling, reviewable annually. Calculations for this figure are shown at Appendix 4. This will be index-linked, paid to the local planning authority on commencement of development and secured via a s106 legal agreement. The contributions will fund SANG projects and the funding of one ranger post and can be pooled.
18. The contributions are based on the costs involved in delivering a new SANG or improving the attractiveness of an existing green space including infrastructure and landscaping and associated costs, ongoing management and maintenance of the infrastructure, and monitoring. The Council will retain flexibility to use the contributions to deliver appropriate SANG in the Borough which may include improvements to deliver SANG on other sites not only Itchen Valley Country Park.
19. In the event that the Council is not able to create sufficient SANG at Land east of Allington Lane and Itchen Valley Country Park, there are other places in the borough which may be brought forward using Council land holdings. The Council's approach in the interim strategy is where possible to use land in its

ownership (where this does not conflict with other competing land uses) and to improve existing greenspace.

20. The interim strategy will also provide an opportunity for developers to deliver their own bespoke mitigation package as an alternative to the financial contribution. This will need to be agreed by the Council in consultation with Natural England and must demonstrate that the measures contained provide additional capacity and deliver an appropriate alternative to visits to the protected sites.

SANG requirements

21. Natural England published revised guidance on SANGs in August 2021. In summary a single SANG must be a minimum size of 4ha, offer a range of informal recreational activities such as dog walking, running and spending time in nature including a choice of 2.3 - 2.5km circular walks, be designed to be perceived as safe, have way-markers, be well linked to footpaths and make provision for a car park. A semi-natural looking landscape with plenty of variation is desirable with little intrusion from artificial structures to provide a similar countryside experience as visiting parts of the New Forest.
22. The amount of SANG required to mitigate the impact of new development is generally calculated based on a requirement of 8ha per 1,000 additional population. However, this standard applies to new developments within the greatest zone of impact (based on the original SANG scheme for the Thames Basin Heaths SPA where 75% of all day visitors originated within 5km). While some parts of the Borough are within the New Forest's 5km zone of impact measured in a straight line, they are separated by Southampton Water. Much of Eastleigh Borough, including the One Horton Heath development site, is 10-15km away with alternative destinations closer by. As the research shows that the level of trips reduces with distance away from the New Forest, it is not appropriate to base the interim strategy on this standard. It is instead based on both the number of additional households and the number of additional visits to deliver proportionate mitigation to address the impact, as explained below.
23. The Footprint Ecology research includes a variety of data which can be used to estimate the additional visits from the Borough. Taking a precautionary approach based on the highest estimate (from the telephone survey undertaken across the subregion including Eastleigh residents), the average number of visits from each household in the Borough is 25 visits each year. This is just under one quarter of the average number from households in New Forest district (105 visits) which is predominantly within the 0-5km zone. The interim strategy is therefore based on a 25% contribution toward the total SANG required, equating to 2ha/1,000 of additional population. The Council expects 13,500 new residents to be living in the Borough by 2027. Therefore a total of 27.1 hectares of SANGs (new or improved existing greenspace) is required to address the impact of development to March 2027.

Natural England view

24. The Council considers that this interim strategy is effective, robust and proportionate. It is based on a reduction in the level of SANG provision per household to reflect evidence showing a decrease in visits with distance away from the New Forest protected sites. While Natural England support the provision of SANG in the Borough, they have advised using the 8ha/1,000 population standard to calculate the SANG requirement to address the impact on the New Forest. They advise that this is the most precautionary approach and it ensures effective SANG provision. This would require the same area of SANG per 1,000 population in Eastleigh Borough as in for example New Forest district.
25. The 8ha/1,000 population standard is based on research at Thames Basin Heaths about the density of people using SANG and providing a level of 'semi-naturalness'. This standard has provided the starting point for the interim strategy which has subsequently been refined as it does not reflect the distance from the protected sites and the number and type of trips that would be diverted. The Council does not consider that the 8ha/1,000 standard provides a proportionate approach based on recent evidence.
26. The Council will continue to work with Natural England to develop the full strategy. This will consider the effectiveness of the measures within the interim strategy and use monitoring and survey data to supplement the existing evidence base.

SANG sites

27. The proposed SANG sites within the Borough are located east of Allington Lane and at Itchen Valley Country Park, and on land shown in Appendix 3 (page 12) of the attached strategy (See Appendix 1).
28. Council officers have considered the scope to repurpose land previously identified solely for nitrates mitigation to deliver new SANG within the Borough. This follows confirmation from Natural England that this would not reduce the number of nitrate credits available on the land. An area of land east of Allington Lane has been identified which will deliver 14.3 hectares of new SANG. This is considered suitable for a new SANG to deliver greenspace close to new development.
29. The new SANG will provide public recreational space and improved links into the wider footpath network. It comprises part of the One Horton Heath site (approximately 5 hectares currently designated in OHH plans an area of ecological mitigation, consistent with this proposed use) and adjoining farmland in Council ownership (10 hectares). The land includes Hearts Copse, a 3.3 hectare SINC, criteria 1A Ancient Semi-natural woodland. There is an existing public right of way through the sites between Burnetts Lane and Allington Lane (West End FP3).
30. The components required to deliver SANG on the site following the removal of debris and tree safety work have been identified. This will include a circular

gravel surfaced path, 10-15 car parking spaces, benches and signage, with boundary treatment as required to include enclosed fencing and designed to screen the SANG and maintain its character. The capital and initial set up costs of creating this new SANG on Council owned land is approximately £2.0 million. In addition to funding these costs, the calculation includes management and contingency costs and annual costs for maintenance in perpetuity (for 80 years). In order to fund both the initial and ongoing costs for this period, the total cost increases to approximately £5.6 million.

31. Alongside the creation of new SANG, there is scope to increase the recreational capacity of existing greenspaces so they can function as SANG or increase the amount of SANG available. Itchen Valley Country Park is an existing open space at the centre of the Borough with public access. The Country Park contains a mix of water meadows, woodland and meadows, it is suitable and very popular for dog walking, and provides a range of walking routes and circular trails. It has scope to increase its capacity through improvements to make it more attractive for visits otherwise made to the New Forest, notably for families looking for a destination for a half or full day out.
32. The Itchen Valley Country Park Masterplan identified improvements to both increase the overall capacity and to extend the season and increase its attractiveness in the winter months. Contributions will bring forward improvements to increase the amount of SANG available including new car parking spaces, improvements to existing footpaths and new signage and interpretation boards. The interim strategy will contribute £704,000 to implementing these improvements. A planning application for the proposals in the Masterplan will be submitted in Summer 2022.
33. At this stage, the area of SANG identified will address the impact of development to March 2027, including approved residential development that requires Reserved Matters approval. Further SANG will be required to address development beyond this time period and the Council will continue to bring forward a pipeline of land when the interim strategy is in place.
34. The contribution collected includes costs for monitoring to check the implementation of the measures and their costs and to assess their effectiveness. This will include the costs to install automatic counters within SANGs to provide information on visitor numbers and staff costs to check and analyse the data. There is scope to undertake a survey of the number of visits made to the New Forest protected sites by Eastleigh residents to supplement the recent survey findings.
35. The contribution required to deliver SANG is based on costings from other Eastleigh projects and other similar schemes with allowances included where necessary. The Council will reconsider the SANG contribution in 12 months' time to take into account updated costs once the detailed design has been finalised. This will be part of a general review of mitigation requirements and reflect new national guidance on the delivery of mitigation land which is expected to be published within the next year.

Financial Contributions to the New Forest Ranger Provision

36. The interim strategy focuses strongly on the delivery of more local and convenient alternatives to visiting New Forest protected sites. However it is recognised that residents of new development in Eastleigh Borough will want to visit the New Forest protected sites due to their scenery, wildlife interest and views.
37. There is currently a limited programme of access management in place within the National Park to address the impact from residents of new development. Appropriate measures could range from the management of paths and tracks and parking revisions to the provision of rangers. Further work is required at a partnership level to assess the specific measures required and level of contributions needed to mitigate the impact of people travelling from further afield including Eastleigh borough. Until a comprehensive strategy is agreed by all authorities, the Council is proposing a similar approach to New Forest District Council who have a higher number of annual visits (approximately 37,500 compared to 28,000 visits) and collect contributions to employ one full-time ranger alongside other access management infrastructure. The interim strategy therefore proposes funding the equivalent of one ranger post including salary and additional costs for 5 years.
38. The funding of this post is intended to supplement the existing ranger team employed by the National Park Authority who will manage the post. Rangers provide face to face interactions with visitors, prepare resources, undertake visitor surveys and potentially get involved in practical projects. This level of funding will be guaranteed for the period of the interim strategy. The funding will be ringfenced to be spent on ranger provision, however the National Park Authority will have flexibility to decide whether to use the funding on a full time ranger post or two seasonal rangers.
39. This contribution is a precautionary approach to reflect the growth planned and the number of visits from the Borough. This contribution will be refined in the full strategy and reflect ongoing work by the partnership on the strategic approach.
40. The New Forest National Park Authority has provided a formal response that welcomes the proposal and is supportive of the proposed ranger role within the New Forest's designated sites. Based on their experience of similar roles, they have advised that the costs of delivering the role is £45,000. They will work with the Council to set up a Service Level Agreement and report back to confirm that the ranger has been employed and is in post and the activities undertaken.

Cost of mitigation

41. The cost of the interim strategy is £1,161 per dwelling, to be paid by developers, index linked and secured through s106 agreement. Calculations and components of this cost are set out in summary a below and in further detail in Appendix 4.

42. The SANG component comprises capital items and associated costs to set up the new SANG at Land east of Allington Lane, maintenance and management in perpetuity (80 years), an allowance for works at Itchen Valley Country Park including visitor signage, interpretation and welcome.
43. The SAMM (Strategic Access Management and Monitoring) component to be spent in the New Forest National Park itself comprises £45,000 per year for the duration of the interim strategy as agreed with the National Park Authority.
44. There are additional monitoring costs of £50,000 per year for the duration of the interim strategy. These are in addition to the ongoing on-site monitoring costs and will specifically inform the full strategy. These include installation of automatic counters to provide accurate visitor numbers and other costs to administer and analyse surveys to supplement existing evidence on the attractiveness of local greenspace and the New Forest protected sites.

Financial Implications

45. The development of the designated SANG site(s) will require financial investment and following Cabinet approval a detailed design and business plan will be drawn up informed by ecology surveys and assessments. However, at this stage, it is anticipated that the costs of creating, managing and monitoring SANG sites will be fully funded from developer contributions.
46. Additionally, there is a requirement to pay contributions to the management and monitoring of visitors to the New Forest undertaken by the New Forest National Park Authority, in recognition that new Eastleigh residents will still visit the New Forest and in growing numbers as residential development progresses, and therefore potentially adversely impact the New Forest protected sites without these interventions. The Council has committed to providing the funding for a ranger post for the time period of the interim strategy subject to the approval of this strategy. Again, at this stage, it is anticipated that these contributions too will be fully funded from developer contributions.
47. The costs of mitigation to be borne by developers are set out in summary form below with more detail given in Appendix 4 to this report. Calculations are based on 5648 dwellings over the period of the Strategy (5yrs).

Summary of costs	Total cost	Cost per dwelling
Deliver a new SANG: Land at Allington Lane	£5,579,146	£988
Improvements to existing Country Park	£704,000	£125
New Forest ranger funding (45,000 for 5 years)	£225,000	£40

Additional Monitoring costs	£50,000	£9
Total cost	£6,558,146	£1,161

Risk Assessment

48. The interim strategy uses land already in the Council's control. The risk of not introducing this scheme is that housing delivery could stall within the Borough as planning application decisions will not be issued. The strategy can be put in place without consultation.
49. When determining whether a planning application can be granted, the Council is the competent authority and will consider the impact of development. There is however a risk of objection and legal challenge via judicial review from a third party as the strategy does not have Natural England support. There is a legal requirement for the Council to take into consideration Natural England's view. The Council has considered Natural England's view in forming this interim strategy and has set out the reasoning for a different approach to providing SANG. The Council will consider Natural England's view on individual planning applications.
50. Delivering the full SANG standard as suggested by Natural England would place extra financial burden on developers. This could threaten the viability of their development, or reduce their contributions for other important mitigations: highways, community infrastructure, air quality, public art etc. The Council's approach helps to mitigate this risk by introducing an interim strategy which is robust and proportionate and places lower burden on developers.
51. The proposed SANG land identified in this strategy at the One Horton Heath site is currently designated for ecological mitigation. If final determination of land use (e.g. for wetland creation, landscape buffering, footpaths, parking) is incompatible with SANG creation, the Council will identify equivalent land in other an location within the Borough, e.g. at Windhover Meadows, for SANG creation.

Equality and Diversity Implications

52. An Equality Impact Assessment was undertaken on the Local Plan and its proposed modifications. The interim strategy implements a requirement set out in the Local Plan policy and has no equality and diversity implications. The detailed design will consider suitable car parking provision, safe walkways and disabled access to address any potential impacts.

Climate Change and Environmental Implications

53. The proposals contained within this report will have a positive impact on the environment. By seeking to provide SANG to encourage residents to stay within the Borough for their recreational visits, there will be a reduction in car journeys to the New Forest and other destinations. Furthermore the approach proposed aims to prevent harm to important habitats from development.

Conclusion

54. The Council, in implementing its planning functions, has a number of legal requirements to satisfy. This includes obligations in relation to certain nature conservation designations. With regard to the Habitats Regulations and the New Forest SAC, SPA and Ramsar sites, mitigation is required as a result of the in-combination effect of new housing through recreational pressures. As such an interim mitigation package has been proposed to provide a way forward in considering applications in the short term.
55. It is recommended that Cabinet approve the interim strategy and the principle of creating SANG within the Borough through using land within the Council's ownership at land east of Allington Lane and making equitable and proportionate financial contributions to visitor management and monitoring schemes within the New Forest.

DICCON BRIGHT
STRATEGIC PLANNING MANAGER

Date: 1 March 2022
Contact Officer: Dawn Heppell
Tel No:
e-mail: dawn.heppell@eastleigh.gov.uk
Appendices Attached: 2

LOCAL GOVERNMENT ACT 1972 - SECTION 100D

The following is a list of documents which disclose facts or matters on which this report or an important part of it is based and have been relied upon to a material extent in the preparation of this report. This list does not include any published works or documents which would disclose exempt or confidential information.

Appendix 1 Interim Mitigation Strategy to address recreation impacts on New Forest protected sites

Appendix 2 New Forest mitigation catchment zone (13.8km) and screening zone (13.8-15km)

Appendix 3 Map of proposed SANG land east of Allington Lane and at Itchen Valley Country Park, also showing other Council land holdings.

Appendix 4 SANG contributions calculations and Business Case

Appendix D

Natural England letter 13/10/2022

Date: 13 October 2022
Our ref: 408043
Your ref: F/20/89488



Rachael Morris
Eastleigh Borough Council

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Rachael,

Planning consultation: Residential development of 61 no. dwellings, with associated public open space, landscaping and amenity areas with access off Satchell Lane.

Location: Land at Satchell Lane, Hamble-Le-Rice.

Thank you for your consultation on the above dated 27 September 2022 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

OBJECTION

Natural England objects to this proposal.

As submitted we consider it will have an adverse effect on the integrity of New Forest Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site.

There is a significant level of uncertainty as to the effectiveness of the proposed in-borough measures to address recreational impacts on the New Forest. We advise it would not be currently possible to conclude no adverse effects on the integrity of the New Forest designated sites.

Natural England's further advice on designated sites/landscapes and advice on other natural environment issues is set out below.

Habitats Regulations Assessment

An updated shadow Habitats Regulations Assessment (sHRA) been produced by CSA Environmental (August 2022) in support of this planning application.

Natural England notes that this sHRA has not been produced by your authority, but by the applicant. As competent authority, it is your responsibility to produce the HRA and be accountable for its conclusions. We provide the advice enclosed on the assumption that your authority intends to adopt this HRA to fulfil your duty as competent authority.

Recreational impacts on the New Forest SAC, SPA and Ramsar

It is noted the applicant proposes to provide a financial contribution towards Eastleigh Borough Council's Interim Mitigation Strategy to address recreational impacts on the New Forest designated sites. Natural England understands this strategy was approved at a cabinet committee meeting in March 2022, to last for 5 years up to March 2027, while cross-boundary partnership work with other affected local authorities and Natural England progresses the development of a longer term, strategic, proportionate, and co-ordinated approach to suitably address the impacts from planned growth across the area.

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

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

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

Deterioration of the water environment

On 16 March 2022 we wrote to your authority about the availability of an updated package of tools and guidance in relation to nutrient impacts. An updated nutrient budget calculator for the Solent was released on 20 April 2022.

We note that the nutrient budget for this application has been calculated in line with the updated Nutrient Neutrality Methodology. Provided the competent authority is assured and satisfied that the site areas used in the calculation are correct and that the existing land uses are appropriately precautionary, then Natural England raises no concerns with regard to the nutrient budget

Please note the calculation is based on all wastewater from the development being treated at Peel Common WwTWS. If this situation changes, a reassessment of the nutrient calculation will be required and a revised Habitats Regulations Assessment will be necessary.

In line with Natural England's advice, it is noted that land at the Whitewool Farm will be used to neutralise the additional nutrient burden that will arise from the proposed development. This is achieved by taking land out of intensive agricultural use.

Provided the above measures can be secured, together with long term management and maintenance to ensure effective mitigation for the lifetime of the development, Natural England raises no further concerns.

Water resources

It is advised that a suitable water consumption rate is appropriately secured with any granting of planning permission. In accordance with the Nutrient Neutrality Generic Methodology, we advise that the water consumption rate used within any nutrients budget(s) should be 10 litres/per

person/per day higher than the rate secured. This is in line with the precautionary approach and accounts for potential changes to less water efficient fittings throughout the lifetime of the development. For example, where 100 litres/per person/day is appropriately secured, 110 litres/per person/day would be applicable within the nutrients budget calculations for the proposed development.

Natural England strongly recommend that all new development adopt a higher standard of water efficiency of 100 litres/per person/day including external water use and re-use in line with Southern Water's Target 100 demand reduction programme. Consideration should be given to the use of grey water recycling systems and efficient appliances. We recommend this figure is appropriately secured with any granting of planning permission.

Sustainable Urban Drainage (SuDs)

The Appropriate Assessment outlines that SuDs have been designed in accordance to best practice requirements in the CIRIA SuDS Manual (C753), which outlines the requirement for extra treatment in relation to site discharges to environmentally protected sites.

We recommend that a long term monitoring and maintenance strategy is submitted to satisfy the competent authority that the SuDS system will operate effectively for the lifetime of the development. Such a strategy should consider appropriate funding, responsibilities and mechanisms to ensure compliance for the lifetime of the development. We recommend that consideration is given to site compliance checks, monitoring, securing corrective measures and replacement facilities, as necessary. Such a plan should be agreed with the local authority.

With regards to the funding of the SuDS, your authority will need to be satisfied that financial arrangements are in place that will guarantee the provision of sufficient funds to ensure the full delivery of an agreed management and maintenance plan for the 80-125 year period. If a resident service charge is to be applied then your authority will need to be satisfied that the charge is legally robust and ring fenced for the purpose of delivering the agreed management plans. Robust financial arrangements are likely to be needed to avoid any problems with claiming monies or shortfalls in payments etc. Legal step-in rights for your authority may be required where the management plan should fail.

Construction Environmental Management Plan

The proposed site is in close proximity to designated areas and surrounding linking habitat, including Solent Waders and Brent Goose site E13. The Appropriate Assessment outlines construction noise will be kept below a maximum of 69 dbAmax during the bird overwintering period.

Natural England advises a CEMP should be submitted and approved in writing by the Council's ecologist that identifies the steps and procedures to be implemented to avoid or mitigate construction activity impacts on species and habitats. The CEMP should address the following impacts:

- Storage of construction materials/chemicals and equipment;
- Dust suppression
- Chemical and/or fuel run-off from construction into nearby watercourse(s)
- Waste disposal
- Noise/visual/vibrational impacts
- Measures to prevent sediment run-off from the site

The approved CEMP should be secured via an appropriately worded condition attached to any planning consent and shall be adhered to at all times, unless otherwise first agreed in writing with the Local Planning Authority.

Recreational disturbance - Solent Special Protected Areas (SPAs)

This application is within 5.6km of the Solent and Southampton Water Special Protection Area (SPA) and will lead to a net increase in residential accommodation. Natural England is aware that Eastleigh Borough Council have adopted planning policy to mitigate against adverse effects from recreational disturbance on the Solent SPA sites, as agreed by the Solent Recreation Mitigation Partnership (SRMP), also known as Bird Aware Solent.

Provided that the applicant is complying with the policy and the Bird Aware Definitive Strategy, Natural England are satisfied that the applicant has mitigated against the potential adverse effects of the development on the integrity of the European site(s), and has no objection to this aspect of the application.

Please note, your authority's appropriate assessment should reflect the current developer contribution rates, which are updated every April in line with the Retail Price Index.

Sites of Special Scientific Interest (SSSIs)

The above impacts on Habitats sites (SAC/SPA) may also impact SSSIs. Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 28I (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

In addition, Natural England would advise on the following issues:

Biodiversity Net Gain

We welcome the Biodiversity Net Gain Assessment (August 2022) and encourage all developments to achieve a net gain in biodiversity. It is advised the Biodiversity Net Gain Assessment and mitigation to compensate for the loss of habitat is submitted to and approved in writing by the district ecologist / biodiversity officer.

One method to ensure net gain is achieved is to compile a Biodiversity Mitigation and Enhancement Plan (BMEP) or similar document that aims to protect and improve the local ecology. This can help to strengthen ecological networks and wildlife corridors. Such a Plan can bring together specific avoidance, mitigation and any compensatory measures to address impacts on species and habitats, detail how biodiversity net gain will be achieved, plus detail additional enhancement measures for wildlife (such as bat and bird boxes, habitat refuges etc.). Such a plan should be agreed with the district ecologist / biodiversity officer and appropriately secured with any planning permission.

The attached Annex A includes opportunities for enhancement such as planting native species in gardens and landscaping, as well as the addition of bird and bat boxes. Net gain is also possible for small scale development where there are limited opportunities on-site as contributions can be taken for offsite projects to help enhance the wider biodiversity opportunities in the city. For example, proportional contributions could be taken to plant new trees, provide new bat and bird boxes, help manage wildlife sites etc.

Further general advice on the protected species and other natural environment issues is provided at Annex A.

Should the developer wish to explore options for avoiding or mitigating the effects described above with Natural England, we advise they seek advice through our [Discretionary Advice Service](#).

Should the proposal change, please consult us again.

If you have any queries relating to the advice in this letter please contact me on 07881 467880 or louise.wyatt@naturalengland.org.uk

Yours sincerely

Louise Wyatt
Sustainable Development Lead Adviser
Thames Solent Team, Natural England

Annex A – Additional advice

Natural England offers the following additional advice:

Landscape

Paragraph 174 of the [National Planning Policy Framework](#) (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Landscape Institute](#) Guidelines for Landscape and Visual Impact Assessment for further guidance.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 174 and 175). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in [GOV.UK guidance](#). Agricultural Land Classification information is available on the [Magic](#) website on the [Data.Gov.uk](#) website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#), and we recommend its use in the design and construction of development, including any planning conditions. Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Protected Species

Natural England has produced [standing advice](#)¹ to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 175 and 179 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. List of priority habitats and species can be found [here](#)². Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found [here](#).

¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

² <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

Ancient woodland, ancient and veteran trees

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 180 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forestry Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Environmental gains

Development should provide net gains for biodiversity in line with the NPPF paragraphs 174(d), 179 and 180. Development also provides opportunities to secure wider environmental gains, as outlined in the NPPF (paragraphs 8, 73, 104, 120, 174, 175 and 180). We advise you to follow the mitigation hierarchy as set out in paragraph 180 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

Natural England's [Biodiversity Metric 3.1](#) may be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. For small development sites the [Small Sites Metric](#) may be used. This is a simplified version of [Biodiversity Metric 3.1](#) and is designed for use where certain criteria are met. It is available as a beta test version.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside [Biodiversity Metric 3.1](#) and is available as a beta test version.

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered

where appropriate.

Rights of Way, Access land, Coastal access and National Trails

Paragraphs 100 and 174 of the NPPF highlight the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the any nearby National Trails. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts.

Biodiversity duty

Your authority has a [duty](#) to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available [here](#).

Appendix E

National Park Authority Consultation

From: [REDACTED]
To: [Mark Rose](#)
Subject: RE: New Forest Recreation Mitigation
Date: 13 October 2022 11:32:09

Dear Mark

Many thanks for the information, judging from some feedback from our Policy Manager I think the key issue here is that although contributions have been taken by other LPAs based on their mitigation schemes, currently there is no agreed system in place with us or agreement on what the contributions might be used for. Our policy manager is looking to meet with other LPAs to discuss this shortly as we'd not been involved but it depends on those LPAs as the competent authorities to facilitate the process. It may be that the contributions are pooled into an annual payment to the NPA against a set programme of work – the on-site mitigation we currently undertake for our own development is somewhat scalable but it needs reviewing in terms of costs and quantum of delivery. We cannot take contributions directly, they would need to go through the relevant competent authority's scheme. The schemes you forwarded have therefore not yet resulted in any resources being transferred to us to date or mitigation delivery being undertaken by us linked to the permissions.

Regards
Ian

From: Mark Rose <mark.rose@csaenvironmental.co.uk>
Sent: 12 October 2022 18:48
To: Ian Barker [REDACTED]@newforestnpa.gov.uk>
Subject: RE: New Forest Recreation Mitigation

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi Ian

Very many thanks for coming back to me on this. I'm surprised to hear you've not received any contributions from outside the NP, as I'd been forwarded the attached for schemes allowed at appeal supported by legal agreements securing contributions, which if I've understood correctly should have been passed on to the NPA (dating from a time when FBC didn't have their own mitigation strategy).

Would you be open to an online meeting to discuss such an approach as a bespoke strategy for an individual project in Eastleigh?

Best regards

Mark

Mark Rose BSc MSc PGDip MCIEEM
Associate Ecologist



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urban design | ecology | landscape | heritage



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From: Ian Barker [REDACTED]@newforestnpa.gov.uk>
Sent: 10 October 2022 16:44
To: Mark Rose <mark.rose@csaenvironmental.co.uk>
Subject: RE: New Forest Recreation Mitigation

Hi Mark

Apologies for the delay getting back to you. I've just left a message on your mobile – basically we're aware that some NE responses might be indicating that a direct contribution to us might address Appropriate Assessment issues, however currently here are no agreements in place to facilitate this by the relevant competent authorities. There has been some discussion initiated however, afraid I'm not aware of that progressing particularly quickly at the moment. Eastleigh Borough might be best placed to confirm what might be feasible in the short and longer term. We don't currently have anything in place with Fareham and have not ever received any contributions from them.

Regards
Ian

From: Mark Rose <mark.rose@csaenvironmental.co.uk>
Sent: 07 October 2022 13:59
To: Ian Barker [REDACTED]@newforestnpa.gov.uk>
Subject: New Forest Recreation Mitigation

You don't often get email from mark.rose@csaenvironmental.co.uk. [Learn why this is important](#)

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good afternoon Ian

I've just left you a slightly garbled voicemail – just following up on the below. I believe that prior to Fareham's adoption of a mitigation strategy, projects there were funding the NPA's strategy directly. In Eastleigh we find ourselves in a similar position, where EBC have an interim strategy in place, however Natural England do not consider it to be precautionary enough.

Appendix F

TVBC Draft SPD (extract)

Test Valley Borough Council

New Forest International Nature Conservation Designations: Recreational Mitigation Framework Supplementary Planning Document

CONSULTATION
DRAFT
November
2021



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Section 180 (5) (d) Planning Act (2008) removed the compulsory requirement for a Sustainability Appraisal for a Supplementary Planning Document (SPD). It is not considered that this SPD would have a significant social, environmental or economic effect, therefore this document has not been subject to assessment under The Environmental Assessment of Plans and Programmes Regulations 2004 (as amended).

5. Options for Mitigation

Overview of Options

5.1 Where it is identified that a proposal is likely to result in a significant effect on the New Forest designations as a result of recreational impacts (either alone or in combination), mitigation would need to be provided to ensure there would be no adverse impacts on the integrity of any of the designated sites. As such, one of the below options would need to be delivered.

- a) **Develop a bespoke mitigation package;**
- b) **Provide Suitable Alternative Natural Greenspace (SANG) to be designed to divert visitors from the New Forest international nature conservation designations; or**
- c) **Provide a contribution of £1,540 per unit of additional residential accommodation towards off-site mitigation measures.**

5.2 The Council and Natural England would need to agree both the proposed approach and specific mitigation measures. The secured mitigation could include measures within and / or outside the designation. The Council's preference is for any financial contribution to be used to aid in delivering SANG and other off-site measures in the first instance. In addition to mitigation measures, a contribution towards monitoring measures would be required (payable on occupation); this has been factored into the figure provided for option c).

Suitable Alternative Natural Greenspace Provision

5.3 Suitable Alternative Natural Greenspace (SANG) would need to be designed to be appropriate in terms of its quantity and quality, and implemented in perpetuity, in order to divert visitors from the New Forest international nature conservation designations. This option is unlikely to be appropriate for smaller sites given the scale of provision they would be likely to generate.

5.4 In broad terms, SANG should provide natural or semi-natural spaces. They should provide attractive walking routes and generally have unrestricted access (including areas for dogs to be off leads). Details would need to be submitted to demonstrate satisfactory design and delivery of the SANG. Additionally, a detailed Management Plan will need to be submitted setting out arrangements for the ongoing management and monitoring in-perpetuity¹⁴ of the SANG, including how this would be funded. The design, and management and monitoring arrangements would need agreement with Natural England and the Council, and be secured, via a completed legal agreement, prior to the determination of the application.

5.5 Regarding quantity, a minimum of 8 hectares (ha) per 1,000 population would be sought. This figure relates to the net area of usable space and is additional to other public open space requirements¹⁵.

5.6 The provision of SANG on site or in close proximity to the site would be the preferred mitigation option for proposals providing in the order of 100+ units of residential accommodation.

¹⁴ In perpetuity is taken to be 80+ years.

¹⁵ See policy LHW1 of the adopted Local Plan.

Strategic Mitigation Package

- 5.7** The Council has delivered, or contributed to the delivery, of mitigation schemes, including the provision of a SANG at Mill Lane in Sherfield English¹⁶ and working with Eastleigh Borough Council to enable the future delivery of SANG at Home Wood, near North Stoneham. We continue to explore opportunities as they arise, including the purchase of sites and through working with other organisations.
- 5.8** As reflected in section 3, the long term approach to ensuring a comprehensive and co-ordinated approach to mitigation for recreational pressures on the New Forest international nature conservation designations is underway with partners and will also be progressed through the preparation of the next Local Plan.
- 5.9** Through a strategic mitigation package, contributions will be sought from proposals where they are unable to provide their own mitigation. This relates to option c) within the mitigation options. Contributions would be pooled to fund projects that have the capacity to reduce disturbance of the habitats and species for which the New Forest is designated.

¹⁶ For more information see: <https://testvalley.gov.uk/communityandleisure/parksandgreenspaces/sherfield-english>

- 5.10** This package of measures¹⁷ could include:
- Providing SANG;
 - Enhancement of walking routes and rights of way;
 - Access management measures which could include improved visitor facilities at robust sites that serve Test Valley residents; and
 - Education and / or awareness raising including through rangers, better information and interpretation, promotion of routes in robust locations, and educational campaigns.
- 5.11** The contributions will be pooled to enable delivery of identified avoidance and mitigation projects and the completion of monitoring work. To ensure the mitigation package is responsive, including to changing opportunities, the package of specific measures will be maintained separately to enable it to be kept under review.
- 5.12** Financial contributions will be indexed (i.e. index-linked to inflation, using the Retail Price Index) to ensure that they retain their original 'real value'. Where relevant, the base date and appropriate index to be applied will be set out in the legal agreement.

Securing Mitigation Measures through Planning Applications and Timing of Delivery

- 5.13** The approach to mitigation would need to be satisfactorily secured prior to the grant of planning permission. The mechanism would need to be agreed with the Council.

¹⁷ Some of these measures align with measures identified for managing recreation across the New Forest, as described at: <https://www.newforestnpa.gov.uk/conservation/managing-recreation/managing-recreation/how-we-are-managing-recreation/>



Appendix G

DEFRA Consultation on BNG (extract)



Department
for Environment
Food & Rural Affairs

Consultation on Biodiversity Net Gain Regulations and Implementation

January 2022

We are the Department for Environment, Food and Rural Affairs. We're responsible for improving and protecting the environment, growing the green economy, sustaining thriving rural communities and supporting our world-class food, farming and fishing industries.

We work closely with our 33 agencies and arm's length bodies on our ambition to make our air purer, our water cleaner, our land greener and our food more sustainable. Our mission is to restore and enhance the environment for the next generation, and to leave the environment in a better state than we found it.



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Any enquiries regarding this publication should be sent to us at:

netgainconsultation@defra.gov.uk

Consultation on Biodiversity Net Gain Regulations and Implementation
Consultation Coordinator, Defra
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York
YO1 7PX

www.gov.uk/defra

Part 3: How the mandatory biodiversity net gain requirement will work for Town and Country Planning Act 1990 development

As set out in the introduction, we want to provide more certainty on how the biodiversity gain condition can be met for development consented under the Town and Country Planning Act 1990.

For development which is subject to the requirement it will be necessary to:

- assess and understand the baseline habitats and design options for the site using the metric and start to complete a biodiversity gain plan
- secure and register off-site habitat enhancements on other landholdings or from the market, if a sufficient biodiversity gain cannot be achieved within the development site
- purchase UK Government-provided statutory biodiversity credits, if off-site habitat enhancements cannot be secured on other landholdings or sourced from the market
- submit the completed biodiversity gain plan to the relevant planning authority, which includes the complete on-site and off-site biodiversity metric assessment and any purchased statutory biodiversity credits
- wait for the plan to be approved before development can commence subject to other pre-commencement conditions

Biodiversity gain plan

Background

The purpose of the biodiversity gain plan is to provide a clear and consistent document with which a developer can demonstrate their biodiversity net gain and a planning authority can check whether the proposals meet the biodiversity gain objective.

There is currently no stipulation in national planning policy for a particular format of plan or metric assessment. We believe that introducing a consistent format will mean that planning authorities do not have to spend time interpreting the range of different templates that might otherwise be produced.

The Environment Act's provisions for development granted permission through the Town and Country Planning Act 1990 state that the biodiversity gain plan must provide:

- information about how the development has taken steps to avoid and minimise impacts on biodiversity,
- the pre-development and post-development biodiversity value of the on-site habitats,
- any off-site biodiversity gains which are registered and allocated to the development, and
- any UK Government-provided statutory biodiversity credits purchased for the development

The Environment Act sets out a power for the Secretary of State to make provision in regulations for other information to be included in a biodiversity gain plan, the form of a biodiversity gain plan and the procedure to be adopted in relation to the submission of a biodiversity gain plan. We intend to require proportionate information on habitat management and monitoring for retained, enhanced, or newly created habitats.

Proposals

We recognise that it is important for planning authorities and communities to know what is being proposed in terms of biodiversity net gain early in the planning process. We will therefore mandate through secondary legislation that certain core **biodiversity gain information** must be provided with the application for planning permission.

This information is not as comprehensive as a complete **biodiversity gain plan**, which will not be required at this stage, in recognition of certain circumstances where details of landscaping are not fully developed or where the detail of biodiversity gain plans are contingent on other matters, such as site investigation works.

Outline and phased development permission: we propose there are additional biodiversity gain information requirements for applications for outline planning permission, and permission which has the effect of permitting development in phases. These proposals are set out in Part 2 of this consultation.

The core **biodiversity gain information** will include:

- the pre-development biodiversity value,
- steps taken to minimise adverse biodiversity impacts,
- the proposed approach to enhancing biodiversity on-site, and
- any proposed off-site biodiversity enhancements (including the use of credits) that have been planned or arranged for the development

The core biodiversity gain information will aid decision-making by allowing the planning authority to:

- better understand how the proposed development intends to meet the biodiversity gain objective
- understand the baseline biodiversity value of the site, and to see how any degradation of this value since 30 January 2020 other than that associated with a planning permission has been considered³⁶
- be aware of the steps taken to minimise any adverse impacts of the development on the biodiversity value of the site,
- understand whether the opportunities for on-site enhancements and landscaping have been fully considered, and
- consider any conditions, obligations, or conservation covenants necessary to secure biodiversity net gain

The application for permission will then be determined, having regard to the biodiversity gain information.

However, we recognise there will be cases where an applicant is able to complete a plan which meets the statutory requirements with the application or before the application for permission is determined.

³⁶ The planning authority may require that an earlier baseline is applied where activity, other than that permitted by a planning permission (for example an earlier development), has reduced the on-site biodiversity value since this date. We do not currently intend to exercise the powers to specify other types of consent which would remove degradation activity from consideration. This is intended to remove any incentive for pre-assessment habitat removal.

Therefore, we propose that you can submit your **biodiversity net gain plan**:

- With your planning application or before permission is determined; in this case, assuming permission is granted and the plan is approved, the net gain condition will be immediately discharged and development can commence
- Alternatively, after planning permission is granted, but before commencement of development

In all cases, we are proposing you will need to submit the core **biodiversity gain information** with your planning application, and to have finalised and approved a complete **biodiversity net gain plan** before commencement. The biodiversity gain information would usually form part of a biodiversity gain plan.

Any off-site biodiversity gains, the use of credits, and significant on-site enhancements (such as a park or meadow area managed for biodiversity) will be part of the biodiversity gain information and will need to be formally secured³⁷. We will work with the sector to develop model planning conditions, planning obligations and template conservation covenants to achieve this.

The planning authority will approve the biodiversity gain plan once they are satisfied that:

- the biodiversity gain plan and completed biodiversity metric (submitted as the completed calculator document, not a 'snapshot' or summary) show a measurable net gain of at least 10% across all unit types (area-based, and where relevant, linear, and riverine habitats), having regard to policy on matters such as additionality
- the information, including pre-development and post-development biodiversity values, presented in the biodiversity gain plan is complete and meets the statutory requirements, and

³⁷ Where the planning authority considers that an increase in the biodiversity value of on-site habitat is significant in relation to the pre-development value, that increase is only considered when calculating the post-development value of the on-site habitat. This is subject to a requirement that it will be maintained for at least 30 years after the development is completed. While there is not an explicit requirement to legally secure other less significant on-site enhancements (such as amenity planting areas or individual street trees), we would also expect suitable management arrangements to be made for these in landscaping plans as is already normal practice and will clarify this in guidance.

- any claimed gains (both on-site and off-site) are appropriately secured and allocated, including the point in the development process that these gains are to be delivered and a proportionate description of how enhancements will be managed and monitored

It remains the UK Government's intention to continue to allow higher percentage targets to be set by planning authorities at a local or site level. Any higher target should be made clear at an early stage in the planning or development process and careful consideration should be given to the feasibility and achievability of any requirements above 10%, which can have significant impacts on the costs of developing a site.

We propose that on-site biodiversity gains should be secured for delivery within 12 months of the development being commenced or, where not possible, before occupation. A clear timeframe for delivery should be reflected in any planning conditions, obligations or covenants which secure on-site gains. Any longer delay in creation must be reflected in the biodiversity metric calculation, meaning that a lower number of biodiversity units is generated. This will mean that long delays to the delivery of habitats would require more enhancement to be done, usually at greater cost.

We intend to publish a biodiversity gain plan template³⁸ in order to set out requirements and to standardise recording of information. A draft is contained in Annex B. This is a working draft and will be updated based on responses to this consultation and extensive testing with stakeholders. We aim to produce a more concise version of the biodiversity gain plan template for developments using the small sites metric and a different template for outline development applications.

In the longer-term, the intention is that the greater digitisation of the planning process should allow such information to be collected in a digital 'machine-readable' format and require compliance with published data standards.

³⁸ This template is intended to set out the minimum legal requirements for a biodiversity gain plan. It is separate from [CIEEM's Biodiversity Net Gain Report and Audit Template \(July 2021\)](#) which is intended to provide a framework for writing reports for biodiversity net gain projects in line with current planning policy and practice.

Appendix H

Belport Letter of Intent 28/10/2022

28th October 2022

BELPORT

Unit 1 Station Industrial Park,
Duncan Road,
Park Gate,
Southampton
Hampshire
SO31 1BX

Dear Andy

BELPORT KEYHAVEN NATURAL CAPITAL SCHEME – BIO-DIVERSITY NET GAIN AVAILABILITY TO FOREMAN HOMES

We recently discussed the requirement for Foreman Homes to identify the availability of some local Bio-Diversity Net Gain (BNG) units for land adjacent to Satchell Lane, Hamble-le-Rice.

Belport has been planning the establishment of a strategy natural capital scheme between Keyhaven and Milford on Sea. The area covers in the region of 375 acres and is currently intensively farmed arable land. The vision is to transform the landscape, in a joint venture with the Hampshire and Isle of Wight Wildlife Trust to one of native, species-rich grasslands and lowland meadows. The management agreement with the wildlife trust will be for 130 years and we will be submitting a Section 106 S33 to the local authorities (New Forest District Council (NFDC) and New Forest National Parks Authority (NFNPA) in the next couple of weeks. The aim is for the scheme to create over 2500 nitrate credits, 500 BNG units and the ability to mitigate habitat destruction in the local area because of construction, development or other effects.

The scheme has the support of Natural England, both LPAs and other local NGOs. Currently the legal documents are being reviewed by the LPAs, advised by Clarke Willmott LLP, with comments from the draft section 106s back with the LPAs for review. Timelines are uncertain but given the robustness of the legal agreements, the BNG ecology reports by Arcadian and the scale of the site, we have a high degree of certainty that we can provide confidence to Foreman Homes that we can deliver their BNG requirements.

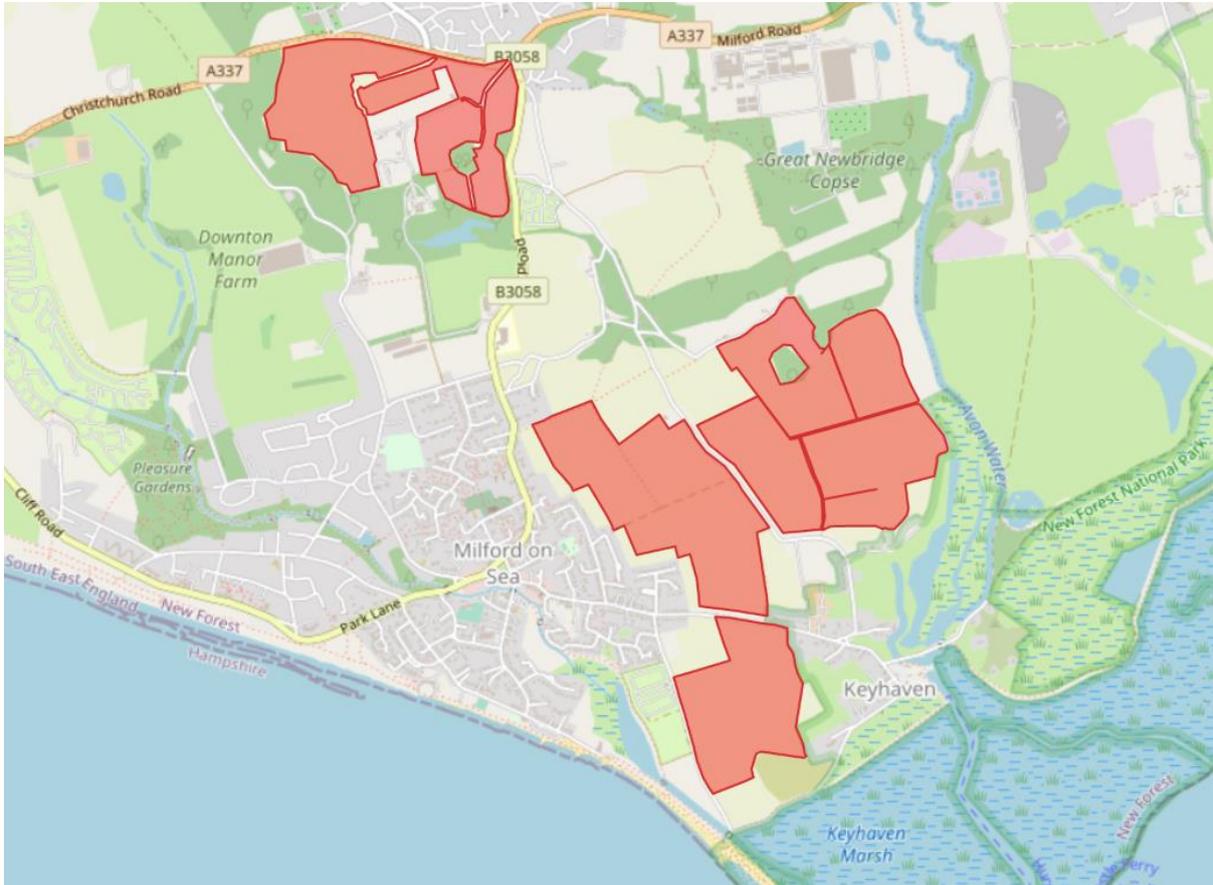
We have spoken with David Illsley and Mark Williams of the respective local authorities, and they have stated that they do not see any issues with Belport, the wildlife trust and Foreman Homes coming to a unilateral agreement to allocate credit/unit linked land within the Keyhaven Natural Capital Scheme to support the Foreman application at Hamble.

Kind regards



ED HARDEN
ed@belport.co.uk

Annex to letter – BELPORT KEYHAVEN NATURAL CAPITAL SCHEME – Map of area



Appendix I

Natural England comments on Keyhaven Natural Capital Scheme

From: Aziz, Rebecca Rebecca.Aziz@naturalengland.org.uk
Sent: 07 October 2022 12:51
To: John Durnell
Cc: Edward Harden; Deborah Whitfield
Subject: RE: New Forest Coastal NN mitigation site

Hi John, hope you are well

Thanks for sending over the Field use and Nitrates Mitigation Capacity Statement and Nitrates Management Plan (HIOWWT, July 2022) on the Keyhaven scheme, and my sincere apologies for taking this long to get back to you. It was good to see both you and Ed at the recent New Forest NPA stakeholder event.

The scheme presents a fantastic opportunity, one that is badly needed in the New Forest catchment to address nutrients. We are very supportive of it. I have a few comments to make

- [REDACTED]

- [REDACTED]

- **Development served**

With regard to the development the scheme could support, this includes New Forest development outlined on page 2 of your report, but I would also add that development on the Isle of Wight over on the opposite side of the Solent from the scheme that drains directly to the Solent via coastal outfalls (e.g. via surface discharge or discharge to ground) would also be able to make use of credits generated by the scheme. (Development draining to the Western Yar or Newtown harbour would not be able to make use of the scheme, due to localised macroalgal impacts in those rivers/estuaries, so mitigation for these developments would need to be prioritised within those specific catchments.)

- **Conservation grazing density**

The report outlines that no single field parcel or aggregate of field parcels will exceed a livestock density of 0.25 units, reflecting the approach taken on the Little Duxmore scheme. However the

Prohibited Activity f within the report refers to 0.5 units. It would be good to get this clarified, noting that a closed system with no supplementary feeding will not increase nutrient leaching from a site.

- Management plan and future BNG ambitions

Natural England support the long term management approach for the site. The comment about stacking BNG on the site in the future is noted. Considering the scale and strategic nature of the site, and the long term management arrangements to be put in place in line with the organisation's charitable objectives, we agree there is likely to be scope for identifying further additional habitat enhancement and creation measures over and above those designed to deliver nutrient neutrality. It will be key to ensure such measures for BNG are clearly demonstrated to be additional, for transparency purposes and to avoid the double funding of certain measures. Natural England will be happy to advise you further on this aspect following further guidance and secondary legislation due to be published soon by Defra.

- [REDACTED]

As you know Natural England have provided 'Letters of Comfort' outlining our support for several nutrient mitigation schemes across the catchment, that has been found useful to local authorities in providing confidence when making planning decisions. I would be happy to provide one for this scheme once the final management plan(s) for the scheme are available and agreed, taking into account above advice; please let me know.

Many thanks
Becky

Becky Aziz
Senior Advisor Sustainable Development
Thames Solent Area Team
Natural England

Mobile: [REDACTED] / Website: www.gov.uk/natural-england



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