

**From:** Miri, Maral <[Maral.Miri@hants.gov.uk](mailto:Maral.Miri@hants.gov.uk)>  
**Sent:** 04 November 2019 10:28  
**To:** Wright, Richard <[RWright@Fareham.Gov.UK](mailto:RWright@Fareham.Gov.UK)>  
**Subject:** P/18/1073/FP - Land to the South of Romsey Avenue

Dear Richard,

**P/18/1073/FP - Land to the South of Romsey Avenue Fareham - Hybrid Planning Application For Residential Development Of 225 Dwellings And Bird Conservation Area, Seeking Full Planning Permission For 58 Dwellings And Outline Planning Permission For 167 Dwellings With All Matters Reserved Except For Access**

Thank you for re-consulting me on this planning application.

In my previous consultation response, I raised concerns in relation to the loss of a Solent Waders and Brent Goose Strategy 'Primary Support Area'. Further justification was requested in relation to the size and location of the off-setting habitat and the timing that the off-setting habitat would be functional (evidence of functionality prior to construction activities commencing). Furthermore, the submitted EclA report lacked the level of detail required in relation to the delivery of the reptile receptor site, operational phase impacts on badgers, construction phase noise impacts and cumulative impacts.

I notice that the location of the off-setting habitat has now been changed to the southern section of the site (previously located in the west), which is considered to be an improvement. However, no further information has been submitted. Therefore, I still remain concerned that sufficient information has not been submitted to indicate that the adverse impacts on the European designated sites will be mitigated. In the absence of this information, the LPA is unable to conclude that the likely significant effects on the Nature 2000 sites will appropriately mitigated at the Appropriate Assessment stage.

I also note that no updated 'Ecological Impact Assessment' report has been submitted to address the concerns raised in relation to other protected species and the cumulative impacts due to the presence of other developments in close proximity to the site.

Furthermore, in accordance with the recent guidance from Natural England in relation to the existing uncertainty about the deterioration of the water environment, any proposal should achieve nutrient neutrality. As such, the applicant is required to submit the nitrogen budget for the development to demonstrate no likely significant effect on the European designated sites due to the increase in waste water from new housing.

Kind regards,  
Maral

Please note that this advice is given in accordance with the Service Level Agreement that has been signed between Hampshire County Council and your Council. These comments are expressed as a professional view provided to Fareham Borough Council and should not, therefore, be interpreted as those of Hampshire County Council.

**Maral Miri (MSc, CEnv, MCIEEM)**

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