

## Rawlings, Sam

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**From:** Kitching, Amy <Amy.Kitching@naturalengland.org.uk>  
**Sent:** 13 January 2022 12:32  
**To:** Salter, Tim  
**Subject:** RE: APP/A1720/W/21/3271412 - ROMSEY AVE, FAREHAM

Dear Tim Salter and Lesley Coffey,

Thank you for your emailed letter dated 17 December 2021. In preparing this response, Natural England has considered the following documents referred to in your letter, together with our previous responses for this proposal:

- Framework Landscape and Environmental Management Plan (FPCR, July 2021)
- Winter Bird Mitigation Technical Note (Tetra Tech, August 2021)
- Funding for Bird Conservation Area Proposals (Foreman Homes, August 2021)

You will be aware that the [Solent Waders and Brent Goose Strategy](#) (SWBGS), which informs our advice, explains that where a proposal results in the partial loss of a Primary Support Area, mitigation measures may be acceptable where, together with long term management, the habitat quality in the remainder of the Primary Support Area can be significantly improved so as to provide for a greater capacity for the target species than the original site. Having reviewed the documents, it remains our position that the suitability of the Bird Mitigation Reserve is still uncertain.

Certainty that mitigation will (as a minimum) replicate the current ecological function of the site can be influenced by a combination of factors. These factors include the size of the proposed reserve, the level of openness, sight lines and the proximity of new development. Considering the Primary status of the existing site alongside the details of the proposed mitigation area and the criteria set out in the SWBGS Mitigation Guidance, we are unable to advise with certainty that the Bird Mitigation Reserve would fulfil or exceed the same special contribution and particular function of the existing Primary Support Area and protect the integrity of the Portsmouth Harbour Special Protection Area. Further information can be found in our previous advice on this proposal, which we consider is still applicable.

Natural England advise that the suitability of the mitigation proposal at this site should continue to be assessed in line with the Conservation of Habitats and Species Regulations 2017 (as amended) taking account of recommendations for Primary Support Areas set out in the SWBGS Guidance, and the precautionary principle.

I hope this advice is helpful and please do contact us should you require clarification or any additional advice. Please note that this response does not include comment on other issues relevant to this site such as nutrient neutrality, or the potential for recreational disturbance effects on designated sites within the New Forest. However, we raised no objection to the mitigation of these aspects in our responses to this proposal.

Kind regards,

Amy

**Amy Kitching**  
Senior Adviser  
Thames Solent Area Team

**Natural England**

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Please note - I am currently not undertaking voluntary activities or working beyond my normal working hours as part of Prospect union's industrial action over poor pay. The reasons for the action are explained on Prospect's website here: [Standing up for Natural England | Prospect](#). There may be a delay in my response.

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**From:** Salter, Tim <[TIM.SALTER@planninginspectorate.gov.uk](mailto:TIM.SALTER@planninginspectorate.gov.uk)>

**Sent:** 17 December 2021 13:11

**To:** Kitching, Amy <[Amy.Kitching@naturalengland.org.uk](mailto:Amy.Kitching@naturalengland.org.uk)>

**Subject:** APP/A1720/W/21/3271412 - ROMSEY AVE, FAREHAM

Dear Amy

The Planning Inspector, Lesley Coffey, has asked that I send you the attached for a response.

Kind Regards

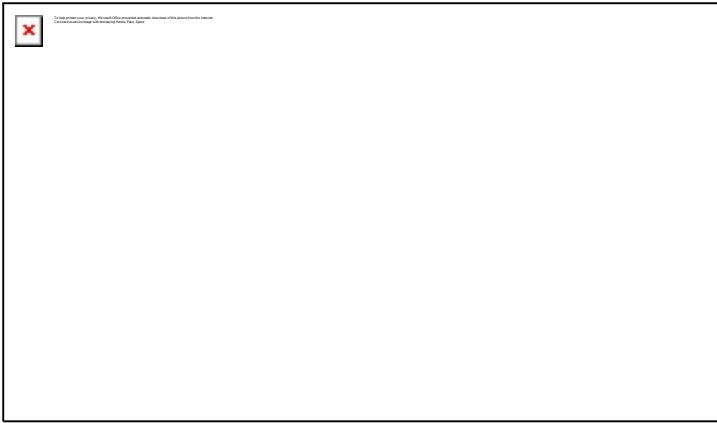
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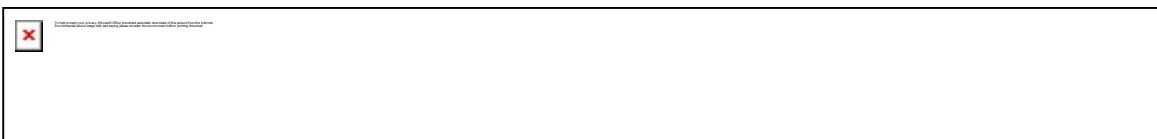


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