

Addendum to Habitats Regulation Assessment for Botley Parish Neighbourhood Plan (March 2025)

Following the end of the Regulation 16 consultation on the Botley Parish Neighbourhood Plan (April 2024), Botley Parish Council has worked with Eastleigh Borough Council and statutory consultees (the Environment Agency and Natural England) to address matters raised through the consultation. These changes have been set out in an addendum note: [botley-parish-council-addendum-note.pdf](#)

This addendum note sets out changes proposed to the Habitats Regulations Assessment which is a supporting document to the Botley Neighbourhood Plan. Details of the changes made are included below via track changes.

Page 1

Non-technical summary

The Landscape Partnership was commissioned by Botley Parish Council to undertake a Habitat Regulations Assessment (HRA) of its Neighbourhood Plan.

It was found that Policies 7 ~~and 8~~, which allocated residential development, ~~and Policy 9, which recognises and accepts a residential allocation in the Eastleigh Borough Local Plan~~, would if no mitigation were applied, cause recreational harm to Solent European sites, recreational harm to New Forest SAC / SPA and Ramsar site, and contribute additional harm to Solent European sites from discharge of nitrates via sewage and runoff. No other policies, individually or cumulatively, would impact any European site.

Mitigation to remove any recreational impact on Solent European sites comprises of developer contributions ~~through a Strategic Access Management and Monitoring contribution @ £200 per dwelling which is part of the New Forest Strategic Access Management and Monitoring Strategy 2023 report by Footprint Ecology. towards implementing the Solent Recreation Mitigation Strategy. Contributions range from £390 for a one bedroom dwelling to £1014 for a five bedroom dwelling.~~

~~Mitigation to remove any recreational impact on New Forest SAC / SPA / Ramsar site comprises of developer contributions towards implementing the interim New Forest Mitigation Strategy. The contributions are used to provide two suitable alternative natural greenspaces, and recreational use would be diverted from the New Forest to these greenspaces. The contribution is £1161 per dwelling.~~

Mitigation to prevent any additional nitrate from entering the Solent European sites can be delivered through purchase of nitrate credits by the developer. ~~Each kilogramme of nitrate per year produced by the development is mitigated by a one-off payment of £3000 to the Council. The money is spent on removing land from arable production,~~

~~thus stopping the nitrate run-off from that land into groundwater and thence into the Solent.~~

It is ascertained that the Botley Neighbourhood Plan will have no adverse effect upon the integrity of any European site acting alone, or in combination with other development.

Page 11

4.4 European sites affected by recreational impacts

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4.4.1 ~~Policies 7 and 8~~ Policy 7 of the Botley Neighbourhood Plan ~~each allocate 20 allocates a maximum of 49~~ dwellings to development at the former Woodhill Preparatory School. The nearest point of the allocations to Solent European sites is around 920 metres. However, there is no direct access to the nearest point of the Solent European site from the allocation sites, with no open access land or rights of way for some considerable distance. Furthermore, Policy 8 requires that development must ensure avoidance or mitigation of direct and indirect adverse impacts on habitats or species protected by legislation or identified as of principal importance within the NERC Act 2006 S41 list and that there is a net gain in biodiversity of at least 10%. Policy 8 of the Botley Neighbourhood Plan is specifically aimed at Habitats Mitigation to ensure no adverse effects on designated sites in the New Forest

4.4.2 This is sufficient to conclude that the allocations in Policies 7 ~~and 8~~ would have no ~~adverse affect~~ adverse effect on the integrity of the European sites acting alone. There are likely to be ~~adverse affects~~ adverse effects on the integrity of European sites cumulatively with other developments in Eastleigh Borough prior to the application of mitigation.

~~4.4.2 Strategic Allocation BO3 of the Eastleigh Borough Local Plan is referenced as Policy 9 within the Botley Neighbourhood Plan. The development is very slightly under 1km from Solent European sites, with River Hamble Country Park intervening and extending to the European site boundary. The Country Park, which is managed by Hampshire County Council, is sufficient to conclude that the allocation at BO3 would have no adverse affect on the integrity of the European sites acting alone. There are likely to be adverse affects on the integrity of European sites cumulatively with other developments in Eastleigh Borough prior to the application of mitigation~~

Page 15

4.4.12 Policy 7 of the Botley Neighbourhood Plan allocates [a maximum of 49](#) ~~approximately 58~~ dwellings ~~to development~~ at the former Woodhill Preparatory School. The nearest point of the allocations to Solent European sites is around 920 metres. However, there is no direct access to the nearest point of the Solent European site from the allocation sites, with no open access land or rights of way for some considerable distance. This is sufficient to conclude that the allocation in Policy 7 would have no adverse affect on the integrity of the European sites acting alone. There are likely to be adverse affects on the integrity of European sites cumulatively with other developments in Eastleigh Borough prior to the application of mitigation

Page 16

~~4.8.13 Strategic Allocation BO3 of the Eastleigh Borough Local Plan is referenced as Policy 9 within the Botley Neighbourhood Plan. The development is very slightly under 1km from Solent European sites, with River Hamble Country Park intervening and extending to the European site boundary. The Country Park, which is managed by Hampshire County Council, is sufficient to conclude that the allocation at BO3 would have no adverse affect on the integrity of the European sites acting alone. There are likely to be adverse affects on the integrity of European sites cumulatively with other developments in Eastleigh Borough prior to the application of mitigation.~~

Policy	Description	Impact on European site	Mitigation requirement?
	along with associated open space	European sites via treated and untreated sewage and run-off.	
Policy 87 : SLAA3-21-C southern parcel Woodhill School	Site supports the development of 20 a maximum of 49 dwellings. 40% affordable housing is required along with associated open space and safe pedestrian access for linking Botley Bridleway 17 to the Pudbrook Green Route via the southern end of the site.	Yes – the allocation will contribute to cumulative recreational impacts upon Solent European sites and New Forest SAC / SPA / Ramsar. The allocation will also contribute to increased nitrate reaching Solent European sites via treated and untreated sewage and run-off.	Yes

<p>Policy 9 Site BO3 (Strategic Allocation) proposals</p>	<p>Policy proposes additional criteria further to that in Policy BO3 of the emerging Eastleigh Local Plan (2016-2036) if retained following consideration by the inspector. This includes additional requirements such as biodiversity measures and the type of development (e.g. 40% affordable housing, the provision of a cemetery and allotments or community space).</p>	<p>Yes — by accepting and adding detail to this site which is already allocated in the Local Plan, the Neighbourhood Plan recognises and accepts the allocation. The allocation will contribute to cumulative recreational impacts upon Solent European sites and New Forest SAC / SPA / Ramsar. The allocation will also contribute to increased nitrate reaching Solent European sites via treated and untreated sewage and runoff.</p>	<p>Yes Policy removed</p>
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Page 21

~~6.1 Botley Neighbourhood Plan, acting alone~~

~~6.1.1 It is ascertained that the Screening Draft Neighbourhood Plan would have no adverse effect upon the integrity of any European site acting alone.~~

~~6.2 Botley Neighbourhood Plan in combination with other plans or projects~~

6.2 Botley Neighbourhood Plan Conclusion

~~6.2.1 It is ascertained that the Screening Draft Neighbourhood Plan would have no adverse effect upon the integrity of any European site. Mitigation for recreational harm to Solent European sites, recreational harm to New Forest SAC / SPA / Ramsar site, and nitrate production causing harm to Solent European sites is secured through Policy DM11 of the Eastleigh Borough Local Plan. Mitigation consist of contributions to the Solent Recreation Mitigation Strategy, to the New Forest Interim Mitigation Strategy and to nutrient neutrality credits.~~

~~6.2.1 It is ascertained that mitigation for any recreational harm will ensure there will be no adverse effect on designated sites in the New Forest. This can be a Strategic Access Management and Monitoring (SAMM) contribution which forms part of the New Forest Strategic Access Management and Monitoring Strategy 2023 report by Footprint Ecology.~~

~~6.2.2 Additionally, mitigation will be required to prevent any additional nitrate from entering the Solent European sites which will take the form of nitrate credits purchased by the developer.~~

6.3 Overall conclusion

- 6.3.1 It is concluded that there would be no adverse effect upon the integrity of any European site from the Botley Neighbourhood Plan acting alone or in combination with any other plan or project.