



# Report to the Partnership for South Hampshire Joint Committee

**Date:** 07 July 2020

**Report of:** David Bibby, Principal Planning Officer (Strategy), Test Valley Borough Council  
– on behalf of PfSH Water Quality Working Group (WQWG)

**Subject:** PFSH NUTRIENT NEUTRALITY UPDATE

## SUMMARY

There is evidence of high levels nitrogen and phosphorus in the Solent water environment, including evidence of eutrophication at some internationally designated sites. This must be addressed as required by the Habitats Regulations. The achievement of nutrient neutrality, if scientifically and practically achievable, is a means of ensuring that development does not add to existing nutrient burdens.

This report provides an additional update on recent progress made on the work that PfSH is undertaking with partners to address the issue of achieving nutrient neutrality from development across the sub-region. This follows the previous updates considered by the Joint Committee on 14 October 2019 and 10 February 2020 and highlights furthermore recent actions since early 2020. In light of the advice from Natural England, the aim continues to be to develop a PfSH wide strategic approach to mitigation in order to achieve nutrient neutral development - and deliver the planned housing development compliant with the Habitats Regulations.

Action continues under a number of workstreams as outlined on the report, in order to progress addressing the nutrient neutrality issue, working with key partners and interested parties.

In light of positive responses received to the requests for funding from PfSH members and other affected local authorities, a dedicated resource in the form of a temporary planning officer post is proposed, to establish a pilot sub-regional mitigation scheme, together with continuing to work towards a Solent Nutrient Fund as a sub-regional mitigation scheme, and which would function as a PfSH wide strategic approach.

For those unfamiliar with the background to the issue, a summary of this was provided as Appendix 1 to the previous report to the Joint Committee on 10 February 2020.

Since the last meeting of Joint Committee 10 February, the following activity has taken place:

- Water Quality Working Group (WQWG) has continued to meet virtually on a regular basis, working closely with the PfSH Planning Officers' Group (POG) and key interested parties
- Consideration of a dedicated temporary planning officer post as a dedicated resource for PfSH to work on the nutrient neutrality issue and take forward a pilot sub-regional mitigation scheme, including the agreement of funding from a majority of PfSH members and other affected local authorities
- An 'in principle' interest to contributing funding towards a Solent Nutrient Fund as a sub-regional mitigation scheme from a majority of PfSH members and other affected local authorities
- Ongoing engagement with Government officials from MHCLG and DEFRA
- Updated advice and methodology from Natural England (NE), including an accompanying non-technical summary and nutrient budget calculation tool
- Discussion taking place between Natural England (NE) and the Environment Agency (EA) on a potential Waste Water Treatment Works (WwTW) permit review, but now temporarily on hold due to Coronavirus pandemic
- Voluntary monthly monitoring now being undertaken by Southern Water of nitrogen discharges from larger WwTW which do not currently have a permit limit.
- Continued work on the Integrated Water Management Study (IWMS) addendum update, in light of updated NE advice and methodology and additional Southern Water discharge monitoring
- Progress in developing and implementing the Hampshire and Isle of Wight Wildlife Trust (HIWWT) mitigation scheme, with the first site now being purchased.

## RECOMMENDATION

It is RECOMMENDED that the Joint Committee:-

- a) ENDORSES the establishment of a dedicated officer resource as a temporary planning officer post to work on the nutrient neutrality issue, and to take forward a pilot sub-regional mitigation scheme;
- b) ENDORSES continued investigation into determining a sub-regional mitigation scheme, including working towards a Solent Nutrient Fund
- c) ENDORSES PfSH's continued work with wider local authority partners beyond PfSH members in addressing the nutrient neutrality issue, including on potential funding;
- d) NOTES that PfSH continues to seek potential options for suitable mitigation measures, and alternative funding sources; and
- e) NOTES that PfSH will continue to work closely with MHCLG and DEFRA to find mitigation solutions and to SEEK support to assist us in achieving these.

## SHORT TERM MITIGATIONS - DEALING WITH THE IMMEDIATE ISSUE

1. While the WQWG has continued coordinating the PfSH-wide response to addressing the need for a medium to long-term strategy (which could build upon an initial pilot scheme in then moving towards a sub-regional mitigation scheme), individual LPAs are also progressing undertaking their own activity in the short-term. **Table 1** below provides indicative figures demonstrating the current scale of the numbers of houses currently backlogged (either solely or principally) due to the issue. This is an update to the figures from the position in February 2020.

**Table 1** - Indicative numbers of homes (units) backlogged due to the nutrient neutrality requirement placed on housing development.

Local Authority	Developments (units) significantly or principally backlogged because of the nutrients issue	Developments solely backlogged because of the nutrients issue (units).
Southampton	0	0
Eastleigh	0	0
Winchester	513	513
Portsmouth	1270	667
Gosport	50	120
Havant*	0	0
Fareham**	1461	-
East Hampshire	25	14
Test Valley ***	1520	-
New Forest (inc NFNPA)	0 (less than 100)	0 (less than 100)
Totals	4,839	1,314

\* *Dependent on the enactment of land transaction discussed at Havant Borough Council Cabinet On 3 June 2020. An update can be provided at the Joint Committee meeting 7 July.*

\*\**Combined figure. Fareham BC requested that their figures be combined.*

\*\*\**Figures representative of the whole area of Test Valley borough (including the area outside of its PfSH boundary). Combined figure. Test Valley DC requested that their figures be combined.*

2. A number of mitigation options continue to be implemented and explored by individual PfSH local authorities, depending upon local circumstances. In some cases these have formal council approval, and also the endorsement of NE as being suitable measures. Some local authorities have also revised their position regarding the issue of nutrient neutrality in the determination of planning applications.
3. **Appendix 1** sets out for each local authority the latest update on what potential short-term mitigation options are currently in place or are being investigated (including their present status).

## **MEDIUM TO LONG-TERM MITIGATION STRATEGY (PfSH ACTIVITY)**

### Water Quality Working Group (WQWG)

4. The WQWG has continued to coordinate the PfSH wide response to addressing the issue, and in addition to all PfSH members being represented, other affected local authorities: Basingstoke and Deane Borough Council, Chichester District Council, Isle of Wight Council and South Downs National Park Authority are also

all now members of the group and participating in its work. All recent monthly meetings have been taking place virtually.

5. The WQWG has been working closely with the PfSH Planning Officers' Group (POG) and officials from MHCLG and DEFRA have regularly joined meetings of the POG via teleconference. In addition, there has continued to be intense level of engagement with partners, on an ongoing basis and further specific meetings have been held with key organisations, both under specific workstreams and regarding the issue more generally.

#### Temporary Planning Officer post as a dedicated resource to establish a pilot sub-regional strategic mitigation scheme

6. The Joint Committee at its meeting on 10 February 2020, agreed to investigate options for a dedicated officer resource for PfSH to work on the nutrient neutrality issue and wider Habitats Regulations and internationally designated site matters, to reflect the specialist nature and workload volume associated with addressing the issues. The aim continues to be to reach the stage of having a developed PfSH-wide strategic approach to mitigation in place in order to achieve nutrient neutral development and deliver the planned housing development to meet needs, compliant with the Habitats Regulations.
7. Natural England has previously suggested the creation of a Government funded officer post to oversee the creation of a strategic environmental plan for the region as a practical way forward. Such an approach would not only address the nutrient issue, but also address issues relating to climate change, health and well-being, net environmental gain and biodiversity gain and air quality. This would enable local planning authorities to focus in-house resources on resolving the short term issue, whilst ensuring that sustainable development is delivered in a smart and affordable way over the medium to long term. In light of the Coronavirus pandemic any potential bid for Government funding is on hold, so it would need at least at present, to be funded locally.
8. Officers (through PfSH POG and WQWG) have been undertaking a scoping exercise on how a pilot scheme could be developed alongside a dedicated temporary Planning Officer post to devise a PfSH-led mitigation strategy (including the implementation of nutrient mitigation measures). This is envisaged to be a short term project, of up to one year, with the potential to lead into a sub-regional mitigation scheme (Solent Nutrient Fund), which could include additional policy aims such as those within the Environment Bill. This has the buy in from both NE and the EA who support this approach. The work would be developed alongside the other interim options also currently being pursued by individual authorities.
9. The dedicated officer will have the responsibility to prepare a PfSH wide strategic approach to deal with the nutrient neutrality issues and to take forward a pilot scheme to test how this would operate. They will be in liaison with PfSH POG and the WQWG.
10. Regarding the scope of the role, a number of specific tasks have been potentially identified to be undertaken, including:

- Identifying land within the relevant geography that would best serve as mitigation land, including where these would bring wider benefits
  - Contacting landowners and identifying costs
  - Quantifying potential offset credits available for developers
  - Devising a credit allocation protocol, taking account of the identified scale of nitrogen credit shortfall per local authority, and likelihood of other offsetting schemes available to developers etc.
  - Administering credits via PfSH steering group to maximise other on-site benefits e.g. woodland planting, biodiversity net gain and open space/public access. This would require funding as the first stage pilot scheme for a sub-regional mitigation scheme (Solent Nutrient Fund).
  - Data capture and management and progress reporting to PfSH steering group
  - Prepare an evidence report recommending further refinements to the scheme to encompass other environmental mitigation requirements e.g. nature recovery strategies and environmental net gain
11. With regard to funding for the dedicated temporary planning officer post and pilot scheme, staff resources within local authorities are insufficient to progress the development of any sub-regional mitigation scheme and therefore financial contributions will be required from participating authorities to enable an officer to be appointed to develop the scheme.
12. In light of this, David Williams (Portsmouth) as the lead chief executive, sent an email request to PfSH member local authorities seeking funding towards this officer post and pilot scheme. This request was also subsequently extended to the other affected local authorities participating in the WQWG: Basingstoke and Deane, Chichester, Isle of Wight and South Downs NPA.
13. PfSH has obtained majority agreement from across the membership to fund the full time dedicated temporary planning officer post. Officers are looking into the potential for determining a fair and equitable approach to how funding for the post is apportioned between local authorities, including non-members - but the model previously used to apportion costs for the work underway on the PfSH Statement of Common Ground will most likely be used. It will be adjusted however, to take into consideration buy-in to the post by non-members. PfSH will now seek to recruit to the post, which may also include consideration of a secondment of an existing officer from a member local authority.
14. This request also sought in principle interest in contributing towards a Solent Nutrient Fund, which would be used to pump prime the investments needed and could fund implementation of the pilot scheme. Any such funding would be used to purchase credits for the individual authority concerned and this would be paid back by developer contributions, as future development takes place. **Table 2** summaries the responses received to both funding requests, including those from local authorities bordering the PfSH area and are represented on the Water Quality Working Group

**Table 2 - Summary table of responses to funding request**

	Agree contribution to temporary Planning Officer Post	Agreement 'in principle' to agree a contribution to a Solent Nutrient Fund
Basingstoke and Deane	✓	✓
Chichester	✓	✓
Eastleigh	✓	✓
East Hants	✓	✓
Fareham	✓	✓
Gosport	✓	✓
Havant	✓	X
New Forest	✓	✓
New Forest National Park	✓	✓
Portsmouth	✓	✓
South Downs National Park	✓	✓
Southampton	✓	✓
Test Valley	✓	✓
Winchester	✓	✓

Solent Nutrient Fund – Nutrient Mitigation Credit Scheme as sub-regional mitigation scheme

15. Following the second part of the request to chief executives, PfSH has obtained agreement 'in principle' from a majority of members to contribute to a Solent Nutrient Fund to pump prime the implementation of a land use change nutrient mitigation credit scheme. The dedicated temporary planning officer post will have a key part in rolling this out and its initial management, including consideration of potential governance and operational arrangements.
16. Noting that positive response were received on an 'in principle' basis, once the scope of how a strategic mitigation scheme might look and how a Solent Nutrient Fund and credit scheme might operate, including potential cost, this can be considered further and formal decisions over whether to participate made. Officers will continue to investigate how this could work in practice as informed by the pilot scheme designed as the work of the dedicated officer. Implementation of the pilot scheme will require funding. As the previous bid to the Solent LEP was unsuccessful, sources of potential funding support will continue to be investigated. Success will be dependent upon funding for any mitigation scheme. In line with that, PfSH has already submitted an expression of interest to the Solent LEP in light of a fresh government funding (allocated in the context of Covid-19 recovery) to be administered by LEPs for, among other projects, green growth and housebuilding.

## Government MHCLG and DEFRA – actions at national level

17. Cross departmental discussions within Government are continuing, including both NE and EA. Officials have requested to continue be kept up to date to inform their understanding of the position locally and what progress is being made to evaluate the issue and in moving towards potential mitigation solutions. They have indicated that they remain welcome any specific requests for intervention or support from Government towards seeking solutions. However, the impacts of the Coronavirus pandemic have implications for progress, given the necessary focus on immediate Government priorities, and on the implications for public finances.
18. As referenced above PfSH continues dialogue with Government officials at MHCLG and DEFRA through regular PfSH Planning Officers' Group (POG) meetings. In particular, they are keen to understand what role they can play in securing support from the Planning Advisory Service (PAS) for the implementation (monitoring and enforcement mechanisms) for a nutrient credit scheme. Any guidance or best practice could then be rolled out to other areas of the country experiencing similar issues.
19. It is understood that NE held a meeting with a number of local MPs on 15 May 2020 to discuss the nutrient neutrality issue. NE has advised that based upon mitigation proposals that it is aware of, or has provided advice on, potential mitigation schemes could if implemented provide potential offsetting for a lower estimate of 37,263 dwellings. These schemes are geographically spread and from a variety of potential sources: retrofitting council housing stock; land use change to open space, green space, nature reserve, woodland and wetland; and end of pipe wetlands to WwTW. NE recognises that where these require the pump-priming mitigation land that this is a significant issue to be resolved and it is continuing to make this point in its own cross Government conversations.
20. However, this is an indicative figure and should be treated with some caution as the proposed mitigation may not all proceed and the figure is based upon initial speculative enquires and developers to NE, which local authorities may not have been party to if informal and outside the scope of a planning application. In the absence of the local authorities having a more detailed breakdown of individual proposals, the summarised information cannot be corroborated. It does though demonstrate a significant level of potential mitigation which may become available over time.

## Natural England (NE) Advice and Methodology for Calculating and Development's Nutrient Budget

21. In March, Natural England (NE) issued updated advice on achieving nutrient neutrality. This replaced the previous advice from June 2019. Taking account of comments and feedback received in the application of the previous advice, and light of developing knowledge and best practice significant revisions have been made and further detail and explanation has been included. In particular key changes are:
  - a. The incorporation of an acceptable TN loading of 2mg/l
  - b. New methodology for developments that drain to package treatment plants (PTP)

c. Further information on the location of mitigation land.

22. The acceptable total nitrogen loading (TN) (a) gives an allowance for background natural N, which means that in all case 2mg/l can be subtracted from mains drainage discharges to WwTW for both those with a N permit limit and for those without. This goes some way to addressing the issue which has been raised regarding levels of N in drinking water.
23. The new methodology for PTP or non-mains drainage (b) changes the approach to one based upon the quantity of nitrogen produced by one person in wastewater in one year. This gives a much higher level of N to be offset than the calculation for mains drainage. NE will however consider the real world performance of PTP treatments processes to reduce the level of N discharged and accept a lower amount of N discharge, is this is justified by sufficient robust evidence of technical standards and which will be maintained. It is worth noting however, that the Environment Agency do not support the provision of PTPs where connection to mains drainage is an option. Therefore the use of PTPs is limited within the sub-region.
24. The further information on the location of mitigation land (c) provides maps of the relevant catchment area in which off site mitigation land (or other measures) can be located in relation to the development site, provided that this is also suitable in all other respects. Both should be within the same catchment area, but with a number of river catchments considered together this provides for greater flexibility and clarity.
25. To accompany the updated advice and methodology, a less detailed non-technical summary document has also been issued which provides an easier to use guide for the layman to the addressing the issues together with a list of 'frequently asked questions', this will be accompanied by a MS Excel budget calculator tool in enable a development's nutrient budget to be more easily calculated.
26. Additional minor revisions, clarifications were made in a further update of the advice in June 2020.

Natural England (NE) and the Environment Agency (EA) – WwTW N Permit Limits

27. The latest position in March was that discussions between NE and the EA were continuing on the consideration of a WwTW permit review, in light of the latest advice and evidence submitted to the EA by NE in December. However, in light of the Coronavirus pandemic this is now currently on hold, as the EA has had to prioritise work on other critical responsibilities. It is not yet known when discussions may potentially be able to be reconvened.
28. It should be noted that the most recent review was in 2007 and a further review is not currently scheduled until 2024 at the earliest. NE and EA will work together to understand the likely timescales, but no further information on a potential timetable has been given. However, it is expected in any event that it will take EA several weeks (or months) to consider the evidence and take a decision on whether to now instigate a permit review. If a favourable decision is taken to do so, then it is likely to be many further months for the review itself to be undertaken. A review would be a major undertaking and require significant

resources. That discussions were taking place earlier in the year, should however be seen as a welcome positive first step in the process. It is anticipated that they will resume in due course once this is possible.

29. If a permit review is agreed, then this could potentially lead to improvements to WwTW and lower discharge levels leading to an increased capacity to accommodate new development, alongside a lower level of need for mitigation. However, such improvements are limited by available technology as well as any site specific operational and financial constraints.

#### Southern Water – Monitoring of N discharges from larger WwTW where no N permit limit

30. From April 2020, Southern Water has agreed to undertake voluntary monitoring of actual nitrogen (N) discharges from the larger WwTW which do not current have an N permit limit. This includes some larger inland WwTW beyond the PfSH boundary, which were not included within the scope of the Integrated Water Management Study (IWMS). This will be undertaken on a monthly basis, alongside the testing already undertaken to monitor the chemicals within discharges for which there are permit limits, and which are reported to the EA.
31. This data will provide figures on actual discharge levels (compared to the 25mg/l which is assumed in the NE methodology when no N permit limit exists). This may allow in the future weight to be given to actual N discharge levels, notwithstanding the absence of a current N permit limit, (although in the absence of such a limit the level of N discharge could increase in the future and there is also risk that the actual recorded level could be higher than the assumed 25mg/l).
32. However, whilst monitoring data will be available on a monthly basis, it will be some time before firm conclusions can be reached, due to the variable affects over the year of: weather, seasonal variations, and changes in discharge flow rates. If a WwTW N permit review was to be instigated by the EA in due course, then this data could also be relevant in this context.
33. This monitoring data on N could potentially though in the interim feed into the ongoing work on the IWMS – Addendum Update, as it becomes available over the coming months. Ammonium discharge levels may also provide a potential proxy indicator for N levels, which could be used as these are more widely available.

#### Integrated Water Management Study (IWMS) - Addendum Update

34. Work on the update to the 2018 IWMS remains ongoing, although the scope of this work has evolved to take account of relevant progress in other related areas e.g. updated NE advice and methodology, and additional voluntary monitoring by Southern Water of N discharges from larger WwTW without an N permit limit. It is being undertaken in the form of an addendum update by the same consultants (Wood plc) who prepared the original study.
35. Further to the update provide to the Joint Committee on 10 February 2020, the scope of this addendum includes:

- calculation of the projected percentage increase in nitrate loading across all WwTWs in total over the present day value
  - a review of Southern Waters Water Resources Management Plan (WRMP) in relation to the Rivers Test and Itchen cases and occupancy rates
  - re-worked nitrate loading calculations based on monitoring data (where available) and/or average over-performance at works
  - identify priority WwTWs in relation to lowest levels of offsetting needed to achieve neutrality
  - review of N export coefficients (the quantity of nitrogen produced by one person in wastewater in one year) in the context of non-mains drainage Package Treatment Plants (PTP).
36. Further remaining work is to update the nitrate loading based upon using ammonium as a proxy for N. This will be for both the WwTWs covered by the original study and the wider geography now affected and covered by the Southern Water voluntary N discharge monitoring. Together with the voluntary monitoring by Southern Water, this could potentially give an indication of actual N levels being discharged from individual WwTW, whereas currently there is no data available.
37. The IWMS Addendum Update will be the subject of a future report to the Joint Committee. The intention is for this work to feed into the future work of the WQWG. It could also assist in informing future investment in wastewater infrastructure and any future WwTW permit review.

#### Hampshire and Isle of Wight Wildlife Trust (HIWWT) – mitigation scheme

38. The mitigation scheme developed by the Hampshire and Isle of Wight Wildlife Trust (HIWWT) operates on a credit system with a cost per kilogram of nitrogen to be offset. Land is purchased and taken out of agricultural production and an individual development is recorded as being offset by a particular parcel of land.
39. HIWWT has now completed its first private land purchase on the Isle of Wight for the purpose of the implementation of nutrient mitigation. The HIWWT continues to seek to identify and purchase appropriate land to further progress the scheme.
40. Discussions are continuing on how off-site mitigation is most appropriately agreed through the development management process and legally secured alongside planning permission. This includes the legal mechanisms for when the location of the mitigation is in a different local authority area from the development site and the principle of seeking to achieve a common approach to securing, monitoring and enforcing the provision of mitigation land.
41. In the longer term, it is likely that a suite of mitigation measures (of which the HIWWT scheme is one) will be used by applicants/developers, potentially in combination, with the choice of measure(s) being dependent upon the nature, size and location of the development. Cost will also be a factor for developers. Consideration of these issues will form part of the investigation work to be undertaken by the dedicated temporary planning officer in progress the scope of a sub-regional mitigation scheme.

## CONCLUSION

42. Action continues under a number of workstreams as outlined on the report, in order to progress addressing the nutrient neutrality issue, working with key partners and interested parties.
43. In light of positive responses received to the requests for funding from PfSH members and other affected local authorities, a dedicated resources in the form of a temporary planning officer post is proposed, to establish a pilot mitigation scheme, in working towards a sub-regional mitigation scheme (Solent Nutrient Fund) as a sub-regional mitigation approach. The officer will have the responsibility to prepare a PfSH wide strategic approach to deal with the nutrient neutrality issues and to take forward a pilot scheme to test how this would operate.

## RECOMMENDATION

It is RECOMMENDED that the Joint Committee:

- a) ENDORSES the establishment of a dedicated officer resource as a temporary planning officer post to work on the nutrient neutrality issue, and to take forward a pilot sub-regional mitigation scheme;
- b) ENDORSES continued investigation into determining a sub-regional mitigation scheme, including working towards a Solent Nutrient Fund
- c) ENDORSES PfSH's continued work with wider local authority partners beyond PfSH members in addressing the nutrient neutrality issue, including on potential funding;
- d) NOTES that PfSH continues to seek potential options for suitable mitigation measures, and alternative funding sources; and
- e) NOTES that PfSH will continue to work closely with MHCLG and DEFRA to find mitigation solutions and to SEEK support to assist us in achieving these.

### Appendices:

**Appendix 1** - Short-term mitigation options being implemented by individual LPAs.

### Background Papers:

Item 9: PfSH Nutrient Neutrality Update, 10 February 2020 Joint Committee

Item 8: PfSH Nutrient Neutrality Update, 14 October 2019 Joint Committee

Item 7: PfSH Nutrient Neutrality Update, 31 July 2019 Joint Committee

Item 10: South Hampshire Integrated Water Management Study, 5 June 2018 Joint Committee

Item 10: South Hampshire Integrated Water Management Study, 28 March 2018 Joint Committee

**Reference Papers:** None

### Enquiries:

For further information on this report please contact:-

David Bibby, Principal Planning Officer (Strategy), Test Valley Borough Council

T: 01264 368105

E: [dbibby@testvalley.gov.uk](mailto:dbibby@testvalley.gov.uk)

## Overview of Short-term Mitigation Measures being implemented by each Local Authority Member

Local Authority	Mitigations measures
East Hampshire	A mitigation strategy was approved on 30 July and has been operational since then. Paragraphs 28-35 of East Hampshire District Council's <i><u>Position Statement on Nutrient Neutral Development</u></i>
Eastleigh	<p>The Council has convened a project team to investigate medium term solutions within the Borough and is working with the Partnership for South Hampshire on strategic longer term solutions.</p> <p>The main new sites will be West of Horton Heath, and the Strategic Growth Option that the Council is planning for in its Local Plan - a mixed use community with at least 5,300 dwellings. These would be served by the Chickenhall waste water treatment works (WwTW) - which is a fluvial WwTW and which, based on the Environment Agency's (EA) current approach has no nitrate permit limits. If the EA were to change its approach this would very significantly reduce the scale of other mitigation required.</p> <p>The range of measures are likely to include, or could include acquisition of agricultural land as part of a wider green infrastructure strategy; woodland planting; reed beds/wetlands adjacent to WwTW; working with EA / Southern Water to seek upgrades to WwTW; potentially working with affordable housing providers to secure water efficiencies across the existing housing stock.</p> <p>The Council already applies conditions to all, not just affordable, developments to secure water efficiency of 105 litres / person / day which is more stringent than the 110 litres recommended by Natural England.</p>
Fareham	<p>In line with our Interim Nitrate Mitigation solution, we are progressing a range of mitigation solutions with applicants. We have granted permission for two Fareham Housing applications using the retrofitting of existing properties.</p> <p>We are working with a range of applicants on a number of mitigation options for developments that are not nitrate neutral. This principally involves off site mitigation and the purchase of nitrate 'credits'.</p>
Gosport	<p>Gosport Borough Council has been looking into a water efficiency programme which could create a limited amount of capacity in the short term.</p> <p>It is keen to link up with the PFSH-wide water efficiency programme, if approved by Natural England.</p> <p>In addition, the Council is working with PFSH/HIWWT on a long-term land change strategy.</p>
Havant	We are currently looking to prepare a mitigation scheme. Possible mitigation options can be found in the Council's <i><u>Position Statement</u></i> .
New Forest	<p>NFDC and NFNPA are preparing a Nutrient Management Strategy supported by consultants EPR. EPR outputs to include scoping and costing of a range of options to minimise nutrient load at source and to offset any additional load that cannot be avoided, and to provide recommendations on the most effective and practicable options for inclusion in a mitigation programme.</p> <p>In addition to developer advice the intention is to set a developer contribution rate to implement a tested and deliverable set of mitigation measures. This part of the project has reached the stage of more detailed evaluation of the most promising options in terms of scale, efficacy and cost, including preliminary land owner negotiations to more accurately cost them and clarify their deliverability.</p> <p>The strategy will seek to mitigate the full local plans impact if possible, or as a minimum to provide some headroom whilst strategic solutions are identified at national and/or PFSH level.</p>

	For NFDC/NFNPA development in the Avon catchment is required to be phosphate neutral and the New Forest strategy will address that as well, including through strategic solutions being developed by the Avon Nutrient Management Partnership that are at an early stage.
New Forest National Park	As above
Portsmouth	<p>Securing water efficiency improvements in perpetuity to allow wastewater 'headroom' for new development; a no net change approach.</p> <p>This includes both offsetting against vacant PCC assets and progressively upgrading the water efficiency of the Council's own housing stock.</p> <p>New development would also be required to have higher water efficiency standards as secured by condition. This is a short-term solution (potentially 3-4 years?).</p> <p>A comprehensive, longer-term strategic solution is still required, in combination with action by government agencies to address the main sources of water pollution.</p>
Southampton	<p>A review of which has just recommenced. The city intends to deliver major urban development / regeneration and as such development will not be taking land out of agricultural use and so in that sense the nitrate effects will be greater.</p> <p>However, two of the three WwTW in the city already have nitrate permit limits. It is understood from general discussion that these may already be at 'best available technology'. The Council is keen to discuss with EA and Southern Water a review of consents, particularly as technology improves, and in relation to the third WwTW.</p> <p>The Council owns considerable housing stock and there is the potential to apply additional water efficiency measures. This would also have a social inclusion effect as Southampton is a water-metered area.</p> <p>Beyond these, measures are likely to focus on working strategically with PfSH, neighbouring authorities and public landowners outside of the city to acquire land to take out of agricultural use, plant woodland, deliver wetlands, and implement sensitive farming measures.</p>
Test Valley	<p>The Council continues to investigate the potential of SANG land, land in Council ownership. However, the focus is on how 'land based' off-site mitigation options could be successfully implemented in accordance with the requirements of both the Habitats Regulations and be secured legally alongside a planning permission. Discussions are ongoing with HIWWT on the practicalities over how their mitigation scheme could successfully operate in Test Valley.</p> <p>The potential for investigating the feasibility of WwTW upgrade has also been examined.</p>
Winchester	<p>The agreed Cabinet position proposes to develop an avoidance and mitigation package to assist applicants. This will include reviewing the scope for additional water use reduction measures in Council housing stock and opportunities for the Council to secure agricultural land de-commissioning (underway).</p> <p>Planning consents are being granted subject to a Grampian condition restricting occupancy until avoidance/mitigation measures are in place. While this allows consents to be issued, few applicants are in position to achieve the required measures on their own sites/land. Work is taking place on initial legal agreements between developers, land owners and the Council to enable the developer to demonstrate that a scheme can meet the nitrate neutral requirement.</p> <p>Report going to Cabinet in July updating the situation and seeking support for the PfSH strategic mitigation and project manager proposals.</p>

