



## **Report to the Partnership for South Hampshire Joint Committee**

**Date:** 25 January 2021  
**Report of:** David Bibby, Principal Planning Officer (Strategy), Test Valley Borough Council  
**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 is a means of ensuring that development does not add to existing nutrient burdens.

This report provides an 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. 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 in this report, in order to progress addressing the nutrient neutrality issue, working with key partners and stakeholders.

PFSH's successful bid in being provisionally awarded a £2m loan by the Solent Local Enterprise Partnership (LEP) from the Government's Getting Building Fund, will be used to secure off site mitigation land in order to assist in unlocking the delivery of housing which has been on hold due to the nutrient neutrality issue. The Solent LEP has since advised that Hampshire and Isle of Wight Wildlife Trust (HIWWT) is its preferred strategic partner to oversee a land use change mitigation scheme funded with the proceeds of PFSH's bid to the 'Getting Building Fund' over the summer. HIWWT officials have been working with the LEP to determine the governance of the resulting scheme of nutrient credits, and ensure that quality assurance and due diligence processes have taken place to secure the funding. A business case has been submitted and agreed by the Solent LEP Board on 11 December 2020.

As advised in the update to members on 30 November, PFSH has successfully concluded recruitment of a temporary Strategic Environmental Planning Officer (SEPO). Simon Kennedy (Project Manager (Regeneration) at Havant Borough Council) has been appointed on secondment. The SEPO will coordinate PFSH's approach to resolving the nutrient neutrality issues for PFSH authorities as well as working on the wider environmental strategy issues across the sub-region. The SEPO will work together with the support of a new Strategic Environmental Planning

Steering Group (membership drawn from across the PfSH membership of local authorities) that will report into the PfSH Planning Officers Group and to Joint Committee. Terms of Reference for the Steering Group have been agreed by the PfSH Planning Officers Group.

Since the last meeting of Joint Committee on 30 September 2020, the following activity has taken place:

- £2m loan as a successful listed project, as part of the funding in principle allocated to the Solent LEP from the Government's Getting Building Fund - to secure off site mitigation land in order to assist in unlocking the delivery of housing, which has been on hold due to the nutrient neutrality issue. HIWWT has put together a business case and submitted it as requested by the Solent LEP to secure the funding. Funding was agreed at the meeting of the Solent LEP Board on 11 December 2020 and the contracting process is underway.
- Successful completion of the recruitment of a temporary Strategic Environmental Planning Officer officer resource for PfSH to work on the nutrient neutrality issue and take forward a pilot sub-regional mitigation scheme.
- On 27 October PfSH submitted a consultation response to the Government's Comprehensive spending Review. The response 'Nutrient Mitigation as a way of Strengthening Economic Recovery' set out the case for funding a holistic approach to implementing solutions to the nutrient neutral approach house building and suggested ways that might be done. A copy of the consultation response can be found on the PfSH website [here](#) (**Appendix 1**).
- On the request of Cllrs Bundy and Glass, as members of the PfSH Overview and Scrutiny Committee, the Chairman has made further representations to MHCLG requesting a suspension of the five-year housing land supply requirement. A copy of Cllr Woodward's letter can be found at **Appendix 2**, together with a copy of the reply received from Minister of State for Housing Christopher Pincher MP - stating that MHCLG is not in a position to offer such a suspension.
- Announcement on 11 September by DEFRA (jointly with MHCLG, Natural England and Hampshire and Isle of Wight Wildlife Trust) of a £3.9m online nitrate trading platform
- Discussion between Natural England (NE) and the Environment Agency (EA) on a potential Waste Water Treatment Works (WwTW) permit review, due to recommence
- Southern Water continues its voluntary monitoring of nitrate levels in Waste Water Treatment Works with no Environment Agency nitrate or 'N' permit. We expect to have initial results of the monitoring in the Spring.

This report provides a statement of the position at the time of writing. Any further progress will be given as a further verbal update to the meeting.

### **RECOMMENDATIONS**

It is RECOMMENDED that the Joint Committee NOTE the content of this report outlining PfSH's activity towards unlocking the delivery of housing which has been on hold due to the nutrient neutrality issue.

## **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, individual LPAs are also progressing undertaking their own activity in the short-term. Updated indicative figures from PfSH member local planning authorities show that the current scale of the numbers of houses currently, and solely, held up because of the issue stand at 1,773 (November 2020).
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 approval of NE. Some local authorities have also revised their position regarding the issue of nutrient neutrality in the determination of planning applications.

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

### Getting Britain Building Fund – Solent LEP Loan Funding

3. The Solent LEP has in principle been allocated £15.9m funding from the Government's Getting Building Fund (GBF), which must be spent by March 2022. Following an invitation to submit a further bid for funding, PfSH's successful bid has been allocated £2M loan 'in principle' by the Solent LEP. Solent LEP have decided to work with the HIWWT to deliver the proposed scheme. The successful outcome of a quality assurance process and positive decision of the Solent LEP Board on the HIWWT Business Case, now means that the formal contracting process can take place to release the funding.
4. The funding will be used towards securing the purchase of off site mitigation land in order to assist in unlocking the delivery of housing which has been on hold due to the nutrient neutrality issue. Whilst this will not in itself provide sufficient provision for the full current amount of mitigation needed and further measures are still required to resolve the issue, it provides a great start and will make a significant contribution towards addressing the current backlog and provide increased momentum in bringing forward future land based mitigation solutions.
5. It is anticipated that mitigation land purchased with the proceeds of the award will facilitate the building of c1,523 new housing units. The loan that will be paid back via developer contributions purchasing nutrient credits. The Solent LEP are contracting with the HIWWT as the delivery body to directly provide the mitigation. PfSH will therefore look to work closely with HIWWT over the coming months..
6. The provision of mitigation to be delivered through the loan funding will be implemented as a first phase, alongside the work of the Strategic Environmental Planning Officer post (see below) who is looking to establish a pilot sub-regional strategic mitigation scheme in moving towards a strategic solution delivered through a future Solent Nutrient Fund.

### Strategic Environmental Planning Officer to establish a pilot sub-regional strategic mitigation scheme

7. PfSH has successfully concluded recruitment of a temporary Strategic Environmental Planning Officer (SEPO). Simon Kennedy (Project Manager (Regeneration) at Havant Borough Council) has been appointed on secondment. The focus of the role will be to work on the nutrient neutrality issue, conforming with Habitats Regulations and internationally designated site matters - reflecting the specialist nature and workload volume being recruited to. The aim is to reach the stage of having developed a PfSH-wide strategic approach to mitigation in order to achieve nutrient

neutral development and deliver the planned housing development to meet needs, compliant with the Habitats Regulations.

8. With regard to the scope of the role a number of specific tasks to be undertaken were detailed in the report to the 7 July meeting. The SEPO will work together with the support of a new Strategic Environmental Planning Steering Group (membership drawn from across the PfSH membership of local authorities) that will report into the PfSH Planning Officers' Group and to Joint Committee as decision making bodies. The Steering Group will assist with and oversee the delivery of work of the SEPO and the making of recommendations to the PfSH Planning Officers' Group, who have agreed its Terms of Reference. The SEPO will also report to the PfSH Water Quality Working Group (WQWG) on progress of the project development work.
9. Work on a scoping exercise on how a pilot scheme could be developed alongside devising a PfSH-led mitigation strategy (including the implementation of nutrient mitigation measures) has continued - and will be taken forward by the postholder. The postholder will have the responsibility to prepare a PfSH wide strategic approach to deal with the nutrient neutrality issues in the context of broader environmental outcomes and to take forward a pilot scheme to test how this would operate. They will work in liaison with PfSH POG and the WQWG which includes representation from Basingstoke and Deane, Chichester and South Downs National Park Authority which are also making financial contributions to fund the post alongside PfSH members.

#### Solent Nutrient Fund – Nutrient Mitigation Credit Scheme as sub-regional strategic mitigations solution

10. As reported to the 7 July meeting, PfSH has obtained agreement 'in principle' from a majority of members to contribute to a Solent Nutrient Fund to pump prime investment need to the implementation of a land use change nutrient mitigation credit scheme. We will also continue to explore other streams of funding for mitigations, for example sending a submission to HMT outlining a narrative to influence the Comprehensive Spending Review 2020 and maintaining a watching brief on the outstanding Environment Agency's legal action against Southern Water (paragraph 13 below refers) and exploring with the Solent LEP whether further funding may be available.

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

11. In light of the Coronavirus pandemic discussions between NE and the EA on the consideration of a new WwTW permit review (taking account of the latest advice and evidence submitted to the EA by NE in December 2019) had been on hold since spring 2020, as the EA had to prioritise work on other critical responsibilities.
12. EA has now resumed its assessment of the evidence provided. There has been a Director level discussion and it is continuing to explore what the scope of a review of permits would be. This scoping is being done in conjunction with NE so that the scale of this work is understood and to inform a decision in 2021. Any review of permits would by its nature, be a lengthy process, and any improvement schemes necessary could take time to implement. EA considers that this decision cannot be taken solely for the Solent area as it also has implications for other locations around the country.

#### Engagement with central government

13. MHCLG, DEFRA, Environment Agency and Natural England officials continue to be invited to meetings of the PfSH Planning Officers Group. On 11 September a joint DEFRA, MHCLG, Natural England and Hampshire and Isle of White Wildlife Trust press release announced the roll out of a £3.9m online nutrient trading platform for Hampshire. PfSH Coordinators have been liaising closely with DEFRA officials and

DEFRA presented an outline of how the scheme will work to the PfSH Water Quality Working Group (WQWG) on 8 December 2020. This will be a two year project, with the first stage January – March 2021 a research phase of stakeholder engagement.

14. The pilot trading platform is intended to test a market based approach to nutrient mitigation which would assess the costs and feasibility of potential solutions compared to other options and wider benefits. It will trial a process to enable developers to connect via its platform to land managers to enable solutions which are fit for purpose and to enable mitigation to be scaled up in a viable manner and which will be in place cover the necessary perpetuity period.
15. The aim is to support addressing the targets to get the internally designated nature conservation sites back to favourable condition, and as part of the wider picture to deliver other benefits at the same time, including for: flood risk, carbon sequestration and the 25 year Environment Plan. It is recognised that farmers and landowners are an important part of the solution and the pilot trading platform will sit alongside a review of agricultural pollution (led by the Environment Agency), the ongoing consideration of a potential WwTW permit review, and the wider agricultural reforms under the proposed Environmental Land Management (ELM) scheme.
16. Going forward, PfSH officers think it sensible to work closely with DEFRA to look at how the work referenced fits in with the work that PfSH authorities and partners are already doing as part of their longer term wider strategy - and picks up the wider nutrient strategy and other environmental issues too.

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

17. 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. Following completion of the first private land purchase on the Isle of Wight, the HIWWT continues to seek to identify and purchase appropriate land to further progress the scheme, in different catchment areas.
18. The HIWWT mitigation scheme, together with other similar schemes are likely to form part of a suite of mitigation measures will be used, potentially in combination, with the choice of measure(s) being dependent upon the nature, size and location of the development. Consideration of these issues will form part of the investigation work to be undertaken by the dedicated officer in progress the scope of a strategic mitigation scheme.

#### **CONCLUSION**

19. 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 stakeholders. A further update will be provided to the next meeting of the Joint Committee in March.

#### **RECOMMENDATION**

It is RECOMMENDED that the Joint Committee NOTES the content of this report outlining PfSH activity towards unlocking the delivery of housing which has been on hold due to the nutrient neutrality issue.

**Appendices:** None

**Background Papers:** None

**Reference Papers:** None

**Enquiries:** For further information on this report please contact:-

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From: Cllr Seán Woodward, Chairman Partnership for South Hampshire (PfSH)  
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Date: 23 September 2020

### **Submission to the Comprehensive Spending Review 2020 - Nutrient Mitigation as a way of Strengthening Economic Recovery**

Housebuilding across South Hampshire is essentially on hold while solutions are found to mitigate the impact new development has on the discharge of nitrates into the Solent. This follows a requirement issued by Natural England that all new housing that discharges into water catchment areas flowing into the Solent be 'nutrient neutral' to prevent further eutrophication of its protected sites.

The negative effect of this on the construction industry, their own providers of goods and services, sustainability of jobs and job growth in the sector has been considerable. The ability of local authorities to meet their own government-set housing targets is therefore also at risk. The MHCLG's own standard assumption is that 1.5 jobs are supported per new dwelling built. Multiply that by the current number of homes currently on hold across the PfSH membership ([PfSH Nutrient Neutrality Update Report to Joint Committee 7 July 2020](#)), that's c2,000 jobs across just our sub-region.

Given the gravity of the situation and the impact it is already having on the supply of new homes across South Hampshire, PfSH has been working hard to work up a suite of long-term strategic solutions to mitigate the impact of this requirement. To do this, PfSH has been working with colleagues in central government departments (DEFRA and MHCLG), the Environment Agency, Natural England, water companies and others - culminating in the roll out a nutrient credit scheme. The scheme is based on the purchase of land (by PfSH and its partners) for re-wilding and selling nutrient credits to developers to off-set the nutrient discharge of new homes being built.

The scheme is in its early stages, with the Hampshire and Isle of Wight Wildlife Trust taking the lead. Such is the demand of developers, all land so far purchased has been oversubscribed. A successful bid submitted by PfSH to the Solent LEP for funding from the Getting Building Fund resulted in a provisional £2m loan which will help to pump-prime the purchase of 'mitigation land' - and DEFRA announced on 11 September a further £3.9m for an online nitrate trading auction platform for the same purpose. PfSH will be working very closely with DEFRA to coordinate the roll out of the separate schemes.

But it's not enough, and neither is the nutrient credit scheme alone enough to secure jobs and growth in construction long-term. Whilst there is definitely a need in the short term to purchase more land for mitigation (and more funding will be needed for this), there is a finite amount of land that can be purchased for re-wilding and the issue is not going to go away. The responsibility for the provision of sustainable nutrient neutrality to off-set the impact of development is a shared one, and a national one. Developers, local authorities, water companies and central government all have a part to play in finding long-term solutions.

PfSH welcomes the recent DEFRA-led joint announcement on 11 September and the provisional allocation of £2m through the Getting Building Fund. We are pleased that the situation, which cannot be unique to South Hampshire, is already on the Government's radar. However, these funds will only stretch to resolving the issue in the short to medium term. The challenge is to find a way of reducing nutrient discharge in a way that facilitates sustainable growth (house-building, other construction) that works in harmony with the environment. Our natural environment is precious and has numerous benefits - [the recent report published by NEF consulting for CPRE Hampshire \(June 2020\)](#) finds that the countryside north of the urban centres of South Hampshire could generate almost £26 million a year in health, wellbeing, economic and ecosystem benefits.

In terms of what else we can do, there are several other measures the Government should invest in to facilitate long term job security, sustainable growth and wellbeing if its ambitions for a green, nature-based recovery from coronavirus are to be realised.

1. Investment in better technology to lower the levels of potentially harmful nutrients (including nitrates) returned back into the water system at Wastewater Treatment Works (WwTWs). While there is no such things as 'pure water', what we can be doing is ensuring that what we take from the system is returned at a level that is similar to that at which it is drawn i.e. we are not 'adding' (or are reducing as far as possible) nutrients to the water we discharge back into the system - ['Latest Environment Agency Figures Reveal all English Rivers Fail Pollution Tests.'](#) While upgrades to WwTW are expensive - there is scope to further reduce the levels of potentially harmful nutrients returned to the water system. Better filtration technology will remove higher nutrient levels in water caused by run-off from agricultural practices of decades ago, benefiting our environment and wellbeing and allowing the free growth of jobs and businesses unhindered by the delays we have already seen and levies on developers when housebuilding contributes to only part of the problem.
2. Further incentives that promote farming practises that reduce the use, or off-set, potentially harmful nutrients that 'run-off' in to system. A significant percentage (up to c70%) of excess nutrients in water comes from run off caused by agricultural practises decades ago and that take years to filter into the water system. DEFRA is already exploring opportunities to address nitrate pollution from farming and is pursuing a strategy which combines incentives and nature based solutions, and tackling the prevalence of non-compliance and pollution incidents through advice led enforcement to reduce the contribution that agriculture makes to protected sites. In sharing the responsibility to addressing the issue, it follows that the farming industry too, should be working toward a requirement to reduce such run-off. The [NFU position statement](#) of October 2019) advocates farmers establishing changes to agricultural land in the wider landholding in perpetuity to remove more nitrogen loss at source. In practise this means creating, for example, wetlands on-site to remove potentially harmful levels of nutrients before they enter rivers and streams that feed the Solent. The NFU suggest that such measures can be easily and cost effectively implemented.
3. Investing, nationally, in ways of reducing the amount of water we use in homes and businesses. Water scarcity is already a problem, and the less we use, the less potentially harmful nutrients will be returned back in to the system. Investing in water efficiency measures in new building development, and upgrading what we have, can significantly reduce the amount of water we take from the system and the waste-water we have to put back - reducing costs long term for everybody and reducing the risk of water scarcity in the future (and associated costs financial and otherwise).
4. Investing in a grant to set up a revolving Solent mitigation fund. Such a grant, if issued to a local accountable body, would give local authorities the freedom and adaptability to implement relevant mitigations in the long term, and provide a dedicated sustainable source of funding to set them up. Until now, lack of funding to implement measures quickly has exacerbated the problem - which has persisted for 18 months since early 2019. A revolving fund would be sustained through payment by developers of nutrient credits for the purchase of rewilding mitigation land, but also reinvested in other mitigation measures over time as part of a long term strategy and as other opportunities for long-term nutrient mitigation measures arise. [Bird Aware Solent](#) is an example of how this might work - wholly funded by developer contributions, it was set up in 2017 by PfSH to protect habitats for birds that migrate to Special Protection Areas around the Solent in perpetuity.

We consider that taken together, and in addition to the land use change mitigation measures already in-train, these represent a strategic suite of measures that not only protect delicate

environment balance but which will have a significant impact on securing jobs in the construction sector in the long term, facilitate sustainable economic growth in the sub-region and improve the public's health and wellbeing.

We strongly urge the Government to consider further investing and/or incentivising in such a measures now, and as part of its comprehensive spending review. As we begin to recover the economy and the Government's fresh approach to green, nature based economic growth we hope that these suggestions are welcomed.

#### About the Partnership for South Hampshire

The Partnership for South Hampshire (PfSH) was formed in 2003 and is comprised of 12 South Hampshire local authorities - the unitary authorities of Portsmouth and Southampton; Hampshire County Council and district authorities of Eastleigh, East Hampshire, Fareham, Gosport, Havant, Test Valley, New Forest, Winchester and the New Forest National Park Authority.

PfSH works collaboratively with partner agencies in the sub region as well as key government departments to ensure joined up strategies, pooling of resources and delivery of transformational programmes that focus on better outcomes for local people. More recently, the formation of Local Enterprise Partnerships and in particular, the establishment of the Solent Local Enterprise Partnership (LEP) has further enhanced PfSH's engagement with private sector businesses in a concerted effort to identify and align business priorities. PfSH continues to proactively engage with business leaders, universities and the voluntary sector through the Solent LEP in support of activities that facilitate sustainable economic growth and create additional homes and jobs for our residents.

ENDS



## **Partnership for South Hampshire**

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The Right Hon Christopher Pincher MP  
Minister of State for Housing  
Ministry of Housing, Communities and Local Government  
2 Marsham Street  
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7 December 2020

Dear Minister,

### **Request for the temporary suspension of the five-year housing land supply requirement across the South Hampshire sub-region.**

Further to representations made to MHCLG both in 2019 and earlier this year. I write to reiterate the request, on behalf of our 12 member authorities, for a temporary suspension of the five-year housing land supply requirement across the South Hampshire sub-region.

Those representations set out the issues our local authorities are grappling with in respect of the requirement that all new housing should be 'nutrient neutral' - which has led to thousands of new homes being held up in the planning system until solutions to the ongoing situation are agreed and implemented. If a temporary suspension is not forthcoming, our councils will automatically fail to meet the requirement to demonstrate a five-year housing land supply due to the nitrate situation - resulting in a major restriction in granting permissions that would form part of that supply. This, in turn, will open the door to speculative development resulting in planning permissions potentially being granted on appeal and on unsuitable sites. This will make certain important policies in local plans totally ineffective during the time when the five-year housing land supply is not being achieved, and particularly when short and medium term solutions to the nitrate issue have been agreed and are available for implementation. This unsatisfactory situation is solely due to factors beyond our councils' control.

In their responses to our previous representations to MHCLG, Ministers have said the situation will continue to be monitored and have stressed that MHCLG, DEFRA and others (Natural England, Environment Agency) are and will continue to work with us to resolve the situation. This is certainly true, and we that accept that our successful bid 'in principle' to the recent Getting Building Fund for nutrient mitigation measures, and the announcement of DEFRA's online nitrate trading portal represent significant medium-term solutions. However, the implementation of these measures is likely to take many months or more before they have an impact on improving the situation. It would be inappropriate that development that would otherwise be contrary to planning policy could gain permission through the appeal system and potentially utilise limited mitigation solutions in place of policy compliant development. On that basis, the temporary suspension continues to be needed.

In his letter of 23 July 2019, your predecessor advised that solutions to the problem should be looked at 'in the round' when referring to the range of solutions possible to address this ongoing issue. We ask that you consider our councils' inability to meet the five-year housing land requirement at this time as a significant causal effect of the same issue and of huge concern to us. A temporary suspension of the requirement should be included as part of the mitigation that will alleviate the breadth of the problems we currently face.

I reiterate what I have stated in in my previous representations, that finding both short and medium/long-term solutions to the problems is a shared objective. It is in all of our interests to ensure that sensible and holistic measures are taken to address the wider impact of the ongoing problems faced now, and in the same way that we will all approach implementing solutions.

I look forward to your reply.

Yours sincerely,

Cllr Sean Woodward  
Chairman, Partnership for South Hampshire



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Our Ref: 9920290

*18<sup>th</sup>* December 2020

*Dear Cllr. Woodward,*

Thank you for your letter of 7 December about requesting the temporary suspension of the 5-year housing land supply requirement across the south Hampshire sub-region.

As you have referenced in your letter, we are continuing to work across government and its agencies to identify practical ways forward, and as part of this we are in the process of offering a loan of up to £5.7 million to the Hampshire and Isle of Wight Wildlife Trust to deliver mitigation to unlock stalled planning applications in South Hampshire. I will also be meeting with the Department for Environment, Food and Rural Affairs Minister, Rebecca Pow, to raise this important matter.

In the meantime, I am not in a position to offer a relaxation on the 5-year housing land supply. It is important to keep the planning system moving so it can play its full part in the economic recovery to come. I should note that in the absence of the 5-year housing land supply, the presumption in favour housing development will not be at the expense of important protected areas, such as Green Belt, Sites of Special Scientific Interest and irreplaceable habitats.

Thank you again for your letter. I hope you find this information helpful.

*Your sincerely*  
*Christopher*

**RT HON CHRISTOPHER PINCHER MP**