

APP/24/00405 | Hybrid application seeking: 1) Full permission for development of new pipelines to transfer water from Bedhampton Springs to fill the reservoir in the winter and draw it off to treat and supply when needed in the summer, comprising: construction of two predominantly underground pipes in tunnels linking the reservoir with the existing pumping station at Bedhampton with associated infrastructure including: emergency drawdown discharge structure at Hermitage Stream; construction of eight access shafts; upgrades to existing culverts close to shafts five, six and eight to manage flood risk; washout and air valve chambers (typically below ground), new plant at Bedhampton Pumping Station, modifications to Bedhampton 2 operational building and permanent diversion of Footpath 34 at Bedhampton Pumping Station. 2) Outline application for an associated underground cross-connection chamber and above ground kiosk at the reservoir site with vehicular accesses for maintenance. An Environmental Statement has been submitted with the application under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. | Pipeline from the reservoir to the north of Middle Park Way to Bedhampton Pumping Station, Meyrick Road, Havant.

Thursday, July 25, 2024 1:19 PM

Thank you for consulting me on this application.

I have reviewed the following documents: revised Environmental Statement Volumes 1-4 plus various relevant appendices (Atkins Realis, May 2024), Planning Statement (Portsmouth Water, May 2024), Construction Environmental Management Plan (CEMP) for the Reservoir site and Main Pipeline (Ward and Burke, May 2024).

Overall, I am content that a sufficient suite of ecological desk-based and field-based assessments have taken place, covering the potential presence and status of various habitats and species within the proposed work area and its zone of influence. This has included general suitability assessments as well as detailed species-specific surveys such as bat tree assessments. The site walkover surveys to record vegetation were carried out at a suboptimal period (winter-early spring). Whilst I acknowledge that the habitats present are generally straightforward to classify, this limitation will increase the likelihood of missing some key plant species. As an example, the grassland adjacent to the Hermitage Stream between Barncroft Way and Purbrook Way contains frequent Corky-fruited Water-dropwort, a relatively common but characteristic species of both dry and damp grasslands in the Havant area. The recent relaxed mow site at Barncroft Way has demonstrated that the 'modified grassland' over neutral-to-slightly acid soils in this area is rather more interesting, with Corky-fruited Water-dropwort, Stone Parsley and Knotted Clover appearing. Whilst I am supportive of measures to reinstate/enhance habitat disturbed during temporary works, it is important to acknowledge the preference for locally relevant habitat over sown 'wildflower grassland' mixes. Where relevant, grasslands along the Hermitage Stream corridor should seek a taller herb-fen habitat and not a generic species-rich grassland (e.g. Great Burnet is not a characteristic species of south-east Hampshire, occurring very infrequently).

Similarly, I welcome the salvage and reinstatement of existing turf at High Lawn and Thicket Lawn SINCs: these areas are of high importance and every effort must be made to protect and retain

existing vegetation and soils. I note the discussion centred around whether or not the grassland habitats in this area conform to the Priority Habitat definitions of Coastal and Floodplain Grazing Marsh and Purple Moor Grass and Rush Pastures, and also note the limitations on vegetation community analysis in some areas due to small sampling size. The default position, based on surveys and analysis conducted by the Hampshire Biodiversity Information Centre (HBIC) is that the mosaic of dry and damp grassland across this area do broadly conform to the Priority Habitat definitions, and are worthy of SINC designation: these are clearly largely unimproved grasslands with areas of impeded drainage, supporting a range of characteristic species. NVC communities recorded include variants of MG5, MG9, MG10 and MG27, all of which are included within the HBIC criteria for inclusion as SINC. Within Havant Borough such habitats are far from widespread and are therefore of high conservation value locally. On this basis, I would query the inclusion as all grasslands within this area as Other Neutral Grassland in Figure 9.7: the area is more complex than this.

Proposed habitat compensation and enhancement measures include works to reinstated habitats throughout the scheme area. This includes the planting of appropriate native tree and shrub mixes as well as species-rich grassland sowing. The efficacy of these measures will be entirely dependent on successful establishment and a commitment to ongoing care and management. Aside from my comments above on the use of suitable seed mixtures, I am content with the submitted details.

Badger

Evidence of Badger setts has been recorded in one area, and other areas of the wider site are considered to offer suitable foraging habitat for this species. The required avoidance, mitigation, compensation and enhancement measures needed for addressing Badger impacts are unknown at present. The documents state that updating surveys will be carried out at an appropriate time. Further information is required at this stage, if only in outline detail, to assist the Local Planning Authority in understanding if impacts to Badgers are considered likely and, if so, what measures will be taken to address those impacts.

Bats

A total of ten trees offering low bat roost suitability are to be removed from the scheme footprint. The proposed update survey methodology for these trees – visual inspections – is appropriate. In the event that bats are encountered or the status of the identified roost feature has been upgraded, further survey works will be necessary. A European Protected Species licence may be required in those circumstances. Other trees identified as offer roost potential – such as those within the Bedhampton site – will be retained. There are additional moderate and high value trees located in other sections of the scheme: again, retention is stated and measures to avoid disturbance are provided. For the buildings at the Bedhampton site, further surveys works are recommended to confirm the status of bats. The results of these surveys, and any mitigating measures, will be required at the earliest opportunity. It is likely that small numbers of bats will be present and that works can be carried out under a European Protected Species licence. Clarification is requested on how this uncertainty over bat roost status meets the requirement for sufficient information for a full planning application submission.

Hazel Dormice

It is assumed that this species could be present within woody habitats across sections 7-9. The species is known to occur at the reservoir site and surrounds and it is sensible to assume presence within any potentially suitable habitat throughout the scheme footprint. Works to potential Dormouse habitat will be carried out under a European Protected Species licence, with key habitat connectivity maintained at key periods, supervised vegetation works, and a series of compensatory nest boxes. The 2024 update report mentions a draft EPSM licence document: this is not provided and I would like to review it please.

Otter and Water Vole

Evidence of Otter presence has been recorded on the Riders Lane Stream and it can be assumed that Otters are likely to occur on occasion along this and the Hermitage Stream: habitats is generally suitable throughout. No evidence of Water Vole has been recorded, although certain stretches of both streams contain suitable habitat. As no direct impacts to either species are anticipated, the proposed update surveys prior to commencement are appropriate. Clearly, if there is any change in status or impacts then the LPA should be notified at the earliest opportunity.

Birds

Overall, the scheme footprint is not considered to be of exceptional value to bird species although all structured habitats offer some potential. Kingfisher habitat suitability and activity surveys concluded that this species is not likely to be breeding within the Riders Lane and Hermitage Stream corridors, although some suitable nesting and foraging habitat occurs. Continued vigilance in the run-up to commencement seems prudent. Areas of open grassland such as at Staunton Country Park are suitable for ground-nesting species such as Skylark, and any areas of woody or tall herbaceous vegetation could support widespread species in the nesting season. Proposed avoidance and mitigation measures – timing of works to avoid main nesting season, plus supervised works as required – are standard and appropriate.

Reptiles and Amphibians

The scheme area is not considered suitable for either Great Crested Newt or rarer reptile species. For the widespread species, it is considered that there is suitable space for animals to be displaced into adjacent habitat without the need for translocation works. I am content with this approach. Mitigation measures entail the use of vegetation clearance combined with hand-searching.

Invasive Species

A number of invasive plant species have been recorded at various locations. Continued monitoring will be undertaken by the ecologist team and measures to prevent spread are detailed within the submitted Biosecurity Management Plan (Ward and Burke, May 2024). I am content with the submitted details.

Other Species

I am content that an appropriate level of survey and assessment has been carried out for various species/groups additional to those above.

Biodiversity Net Gain

The proposed development is eligible for mandatory BNG. The submitted Biodiversity Metric and BNG report are acceptable, and the applicant has identified a (preliminary) BNG shortfall for area habitats and watercourses which will require appropriate compensatory habitat to be found. The temporary losses of habitat within the scheme area are proposed as being 'temporary' in BNG terms: i.e. the reinstatement of the same habitat within an acceptable timeframe equates essentially to a 'no net loss' scenario. BNG therefore applies to habitats that are lost permanently. As BNG is a post-permission matter, full details of exactly how any BNG is to be delivered will come with a pre-commencement Biodiversity Gain Plan and Habitat . Any BNG measures must be directly attributable to this development and there must be clear delineation between this proposal and any biodiversity measures related to the main reservoir development: this is particularly relevant to watercourse unit requirements (substantial watercourse enhancement are planned for the reservoir and any measures for this scheme must be additional). Obvious targets for watercourse BNG are the Hermitage and Riders Lane Streams. Discussions with Local Planning Authorities around BNG provision are encouraged, although the ability of LPAs to deliver BNG on their own land is restricted at present. LPAs cannot be signatories to legal agreements as both planning authority and landowner. Land around the hermitage Stream is managed by Havant Borough Council on behalf of the landowner Portsmouth City Council: this may present an opportunity for BNG to be delivered. I would very much welcome additional habitat improvements along the highly modified Hermitage Stream corridor.

Havant Borough Council's approach to BNG is that it should be consistent with the aims of the forthcoming Local Nature Recovery Strategy (LNRS) i.e. that measures should be targeted at the local landscape, providing locally-relevant habitat types that bolster the existing ecological network of sites and habitats.

Habitats Regulations Assessment

The submitted HRA is an appropriate assessment of the potential impacts of the scheme, alone and in combination. The European sites included in the scoping and screening are suitable and a comprehensive range of potential impact pathways are identified. Potential impact pathways are identified between the scheme and the Solent marine sites (SAC, SPA, and Ramsar) as well as the Singleton and Cocking Tunnels SAC. Various measures are proposed to manage risk, including Environment Agency consents, a Drainage Management Plan, Construction Environment Management Plan, Biodiversity Mitigation and Compensation Strategy and adherence of pollution prevention measures. Together, these measures are considered adequate for controlling risk of impacts through hydrological pathways.

In respect to the Singleton and Cocking Tunnels SAC and potential impacts to bat species, there is a potential functional link between the scheme area and the SAC. Standard measures to ensure that bat populations within the scheme area are deemed to be acceptable and should avoid population-level impacts. I am content with the conclusions of the HRA overall.

Summary

Overall, the application is of good quality, with surveys methods and results well described and value assessments justified. I acknowledge the scale of the scheme and that some degree of uncertainty is inevitable. The commitment to habitat reinstatement for temporary works areas is welcome and will require long-term monitoring and management. Impacts to various protected and notable species can be avoided and or mitigated with appropriate care, and post-development habitat compensation can serve to maintain and enhance biodiverse habitats. The provision of BNG is an opportunity to deliver a tangible gain across the scheme area.

If you have any queries, please don't hesitate to contact me.

Kind regards,

Tristan

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