

Date: 02 March 2021
Our ref: 342517, 342518, 342694
Your ref: APP/20/00990, 51680/001, APP/20/00991



Lewis Oliver, Havant Borough Council

BY EMAIL ONLY

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Dear Lewis

Planning consultation: 5168/001, APP/20/00990, 51680/001 Hybrid application seeking: Full Planning permission for Development of a reservoir for raw water storage. control house, construction of a visitor centre / café etc APP/20/00991 | Outline application for development of a new pipeline to transfer water from Bedhampton Springs to fill the reservoir – Further Information Submitted

Location: Havant Thicket, adjacent to Sir George Staunton Country Park, Reservoir and Pipe Line, Middle Park Way, Havant

Thank you for your consultation on the above dated 04 February 2021 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Additional information has been submitted by Portsmouth Water to address our earlier consultation response dated 19 December 2020. Please note many of our earlier comments still stand. Additional information has been submitted by Portsmouth Water to address these issues:

- alternative options considered for the design of the access roads
- clarification of measures identified in the outline compensation and mitigation strategy and in relation to the outline pipeline application.
- a mitigation approach to address in-combination impacts on the favourable conservation status of Bechstein's bat that hibernate in Singleton and Cocking Tunnels Special Area of Conservation.

Alternative options for the design of the access roads

Northern access – further clarification sought

We note that the design options for the northern access road have been explored in detail by Portsmouth Water and efforts made to minimise the additional impact on ancient woodland as far as possible and this is welcomed.

In accepting the further harm associated with the proposed access route your authority

should be satisfied that all alternative options that would reduce harm to the ancient woodland have been fully explored with key landowners. Natural England requested further information to clarify if all options have been fully exhausted. As you are aware, the northern access route is routed through ancient woodland and will have both direct and indirect effects, in addition to the arising from the footprint of the reservoir.

We note from the submission that the option to access the site from Swanmore Road to the south via Dunsbury Business Park scored the highest in an options appraisal, but this route has not been supported by Portsmouth City Council, who own and manage the business park, due to concerns about likely significant impact on its users.

We have recommended that this alternative access route is explored further by Portsmouth Water with input from the local planning authorities; Havant Borough Council, East Hampshire District Council and Portsmouth City Council. The reservoir is of regional importance from a water resource perspective and will also provide a cross-boundary benefit in terms of recreational resource. We encourage a further conversation between all key stakeholders to confirm whether all avenues to minimise the impact of the proposal on irreplaceable habitat have been explored and to discuss the impact on users of the business park further and understand if there are mitigation measures that can be taken at the business park to allow this access route to be supported.

It is also noted that there is an alternative option - 2A - through land owned by Borrow, which is outside of ancient woodland. It would be useful to understand if there is scope for further discussions by Portsmouth Water and the Borrow estate, aided by the local planning authorities if necessary, to explore this alternative access route.

Southern access

Natural England and Forestry Commission advice for ancient woodlands is that there should be a buffer zone of at least 15 metres to avoid root damage. Where assessment shows other impacts are likely to extend beyond this distance, you're likely to need a larger buffer zone. For example, the effect of air pollution from development that results in a significant increase in traffic.

It is Natural England's preference that a buffer of a minimum of 15 metres is fully met for the southern access road. It is noted that this is not practicable for some sections of the southern access due to the tight constraints. We advise that the local planning authority is satisfied with the design details for the access route and that all alternative options and design measures have been considered in this case. We advise that this is explored by the local planning authorities as part of the wider discussion on access arrangements to ensure you are satisfied with the approach taken.

Mitigation and compensation strategy

It is welcomed that Portsmouth Water is producing action plans for the detailed elements of the mitigation and compensation strategy. It is noted that this is work in progress and we look forward to reviewing these action plans in due course.

If it would be helpful to the local planning authority, Natural England would be happy to attend a meeting to discuss how the elements outlined in the action plans are secured through the legal agreement.

Impacts from the pipeline

It is welcomed that a biodiversity mitigation and enhancement plan will be produced at the

detailed design stage and that this will include measures for the protection and enhancement of sensitive habitats associated with the Thicket Lawn and High Lawn SINCs. This approach is welcomed.

Habitat Regulations Assessment and Bechstein's bats

It agreed that it is not a requirement for Portsmouth Water to progress the strategic mitigation solution for Bechstein's bats and we do very much welcome the work that Portsmouth Water has been completed to date on survey and evidence-gathering for Bechstein's bats in this area of Hampshire. It is also agreed that the timing for the progression and adoption of the strategy is ultimately a matter for the local planning authorities. However, should the reservoir be permitted, there will be a significant landscape change for the locality which is additional to the incremental losses from in-combination plans and applications that may have occurred to date. It is our view that, given this additional landscape change with the reservoir and the significant development growth coming forward, the early adoption of a strategic mitigation tool will be very important going forward to ensure the in-combination impact has been addressed.

We would therefore encourage this to be progressed and that a timescale for the strategy is agreed between Havant Borough Council and East Hampshire District Council. We recommend that the approach to be taken is further discussed with the local planning authorities and Natural England would be happy to attend a meeting if helpful.

If you have any queries relating to the advice in this letter please contact me on 07717808691.

Please consult us again once the information requested above, has been provided.

Yours sincerely

Rachel Jones
Senior Advisor, Sustainable Development
Natural England, Thames Solent Team