

Habitat Regulations Assessment (HRA)

Screening Matrix and Appropriate Assessment Statement

PLEASE NOTE: Undertaking the HRA process is the responsibility of the decision maker as the Competent Authority for the purpose of the Habitats Regulations, however, it is the responsibility of the applicant to provide the Competent Authority with the information that they require for this purpose.

HRA completion date:	28 April 2021
Application references:	Havant Borough Council- APP/20/00990 and APP/20/00991 – East Hampshire District Council 51680/001
Application address:	Havant Thicket, adjacent to Sir George Staunton Country Park, Reservoir and Pipe Line, Middle Park Way, Havant and Pipeline from Proposed Reservoir Site, Middle Park Way to land adjacent to, West Street, Havant.
Application description:	Havant Borough Council -APP/20/00990 and East Hampshire District Council 51680/001 - Hybrid application seeking: 1) Full Planning permission for Development of a reservoir for raw water storage, A pumped storage reservoir, with the minimum required total storage capacity of 8,700 million litres (ML), to support the planned bulk supply transfer of at least 21ML/d in extreme (currently defined as 1:200 year) drought conditions; Construction of an earth embankment adjacent to Staunton Country Park ; Construction of an overflow discharge/spillway at the south-western side of the reservoir and associated works; Construction of a new junction on the B2149 Manor Lodge Road and a new junction on Swanmore Road. Provision of viewing areas on the southern embankment and western edge of the reservoir. 2) Outline application for (matters to be considered outlined in Table 2.2 in the submitted Development Specification) control house partially incorporated within landscaped earth mounding adjacent to the south west embankment; together with provision of other earth embankments. Construction of a visitor centre / cafe, with storage areas and welfare facilities to the northwest of the reservoir to be used for recreational and education purposes; Provision of picnic area(s) and children's play area(s). Access routes from both junctions to the visitor car park; visitor car park comprising 193 car parking spaces and between 70 and 75 overflow spaces plus spaces for staff, coach/minibus and disabled drivers sited to the north west of the reservoir. Creation of a permanent wetland on the northern side of the reservoir and construction of bird watching hide/screen(s); recreational facilities for public amenity. Provision of perimeter tracks and a network of bridleways, cycle paths and footpaths; Construction of a slipway on the western bank of the reservoir for operational use only and a small section of the proposed pipeline (210m). APP/20/00991 Outline application for (matters to be considered outlined in Table 2.2 in the submitted Development Specification) development of a new pipeline 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 an underground, bi-directional pipeline linking the reservoir with the existing pumping station at Bedhampton; Emergency drawdown discharge structure at Hermitage Stream; Upgrades to existing culverts; Washout and air valve chambers (typically below ground).
Status of Application:	Reservoir application – Hybrid application. Pipeline application - Outline
Proximity to SPA/SAC/Ramsar:	3.85km (reservoir site) 1km (pipeline route)
Grid Ref:	SU71610977
Lead Planning Officer:	Lewis Oliver

Stage 1 - details of the plan or project

European site potentially impacted by planning application, plan or project:	- Chichester & Langstone Harbours Special Protection Area (SPA) and Ramsar site. - Solent & Dorset Coasts SPA. - Solent Maritime Special Area of Conservation (SAC). - Singleton & Cocking Tunnels SAC
Is the planning application, project or plan directly connected with or necessary to the management of the site (if yes, Applicant should have provided details)?	No. The development consists of a new winter storage reservoir and associated pipeline, which is neither connected to nor necessary to the management of any European site.
Are there any other projects or plans that together with the planning application being assessed could affect the site (Applicant to provide details to allow an 'in combination' effect to be assessed)?	Yes. Details are provided in the following section.

Stage 2 - HRA screening assessment

Test 1: the significance test – The Applicant to provide evidence so that a judgement can be made as to whether there could be any potential significant impacts of the development on the integrity of any European site.

The following documents have been used, in conjunction with independent review of evidence by the Local Planning Authority, to produce this Habitat Regulations Assessment (HRA) Screening Matrix and Appropriate Assessment Statement:

- Habitats Regulations Assessment (Atkins/Portsmouth Water, September 2020)
- Implementation Plan for Off Site Biodiversity Mitigation and Compensation (Atkins, April 2021).
- Havant Thicket Reservoir Project – Environmental Statement Volume 4 – Appendix A15, Water Framework Directive Assessment.
- Outline Biodiversity Mitigation and Enhancement Strategy (ECOSA, September 2020).
- Technical Note – Article 4.7 WFD Short-listing methodology (Atkins, March 2021).
- Letter to Portsmouth Water - Havant Thicket Winter Storage Reservoir – Water Framework Directive (WFD) Article 4.7 (Environment Agency, 18 February 2021).

Site Screening

Havant Borough Council agrees with the Screening Assessment carried out by the applicant. The following European sites have been taken forward for further assessment:

- Chichester & Langstone Harbours Special Protection Area (SPA).
- Chichester & Langstone Harbours Ramsar site.
- Solent & Dorset Coasts SPA.
- Solent Maritime Special Area of Conservation (SAC).
- Singleton & Cocking Tunnels SAC.

Discussion between the LPA ecologist and Natural England (NE) confirmed that NE welcomed the inclusion of the Singleton & Cocking Tunnels SAC within the HRA due to the likelihood of SAC qualifying bat species mixing with bat populations within and around the application site. The link between the application site and another bat SAC at Ebernoe Common, situated c.30km North-east, is not supported by robust evidence and therefore this European site is not included within the screening assessment.

For the above European sites the following impact pathways are summarised below:

Habitat loss

The proposed applications would not result in any direct or functional habitat loss within the boundaries of any European site.

The proposed reservoir development is situated c.15km SW of the Singleton & Cocking Tunnels SAC. The SAC is designated for the protection of roosting sites for two rare bat species – Western barbastelle and Bechstein's bat. Although there is no unequivocal evidence to date, it is considered more likely than not that bats using the SAC are functionally linked to populations of these species recorded within the proposed reservoir site and surrounding areas. On that basis it is considered that there is potential for impacts to habitats functionally linked to the SAC.

There is potential for the proposed development to result in the direct loss of roosting habitat (trees) for SAC qualifying feature bat species. In addition, there is potential for the direct or functional loss of SAC supporting habitat: habitat used for foraging, commuting or other behaviours by bats associated with the SAC.

No direct habitat loss will occur within any of the remaining European sites or their supporting habitat. There is some minor potential for construction noise at the Bedhampton & Havant Springs pumping station to result in disturbance to two areas of SPA/Ramsar supporting habitat. Solent Wader & Brent Goose Strategy (SWBGS) Sites H05a and H11 are situated within c.300m of the pumping station. Impacts arising from construction noise could potentially result in functional habitat loss via the disturbance of SPA/Ramsar bird species.

Water Quality

The proposed works will require substantial modifications to hydrologically-linked watercourses feeding into Langstone Harbour and therefore potentially affecting Chichester & Langstone Harbours SPA/Ramsar, Solent & Dorset Coast SPA and Solent Maritime SAC. There are also potential impacts to these sites arising from sediment mobilisation into watercourses during construction as well as impacts resulting from abstraction from the Bedhampton & Havant Springs.

Impacts from the mobilisation of sediment or pollutants could result in eutrophication and increased turbidity, with the potential to affect European site habitats and species. Natural England advise

that there is existing evidence of high levels of nitrogen and phosphorus in the Solent water environment with evidence of eutrophication at some designated sites. Eutrophication (historic and ongoing) is identified as a significant threat to the Solent European marine sites, resulting in dense algal mats smothering sensitive marine vegetation and decreasing dissolved oxygen. These affect the status and distribution of the qualifying habitats and species and therefore act against the stated conservation objectives of the Solent marine sites.

Construction

Identified impacts during the construction phase are associated with physical works to watercourses and the extensive excavation and movement of soils, as well as the effects of abstraction and reduced flow rates in watercourses entering Langstone Harbour:

- Water quality degradation via sediment mobilisation.
- Water quality degradation via nutrient (nitrates and phosphorous) mobilisation.
- Changes to freshwater inputs to Langstone Harbour.
- Changes to salinity in Langstone Harbour.

Operation

Identified impacts during the operational phase are primarily associated with the abstraction of water from the Bedhampton & Havant Springs and the potential for resulting changes to freshwater inputs to Langstone Harbour:

- Water quality degradation via sediment mobilisation.
- Water quality degradation via nutrient (nitrates and phosphorous) mobilisation.
- Changes to freshwater inputs to Langstone Harbour.
- Changes to salinity in Langstone Harbour.

There is some potential for phosphorous increases within the reservoir due to large gatherings of birds attracted to the site. It is possible that increased phosphorous concentrations could enter local watercourses via discharge from the reservoir, resulting in eutrophication.

In an emergency drawdown situation (where the reservoir needs to be emptied rapidly) waters will be discharged into the local hydrological network. There is potential for increased flows arising from emergency drawdown to increase freshwater input to Langstone Harbour, thereby reducing salinity and/or increasing turbidity and nutrients and leading to eutrophication.

In summary, there is a range of potential impacts arising from the proposals. These have the potential to result in likely significant effect on the European sites identified in the screening stage of the HRA. These sites - Chichester & Langstone Harbours Special Protection Area (SPA), Chichester & Langstone Harbours Ramsar site, Solent & Dorset Coasts SPA, Solent Maritime Special Area of Conservation (SAC) and Singleton & Cocking Tunnels SAC – are therefore taken forward for further assessment.

Would the proposal lead to a likely significant effect on European site integrity alone? YES

In-combination effects

The applicant's HRA includes a comprehensive list of plans and projects (i.e. planning applications, live or which are reasonably likely to proceed) which could be considered to result in an in-combination effect alongside this proposal. Full details of these are found within Chapter 7 of the applicant's HRA. The list of plans and projects is considered acceptable.

The in-combination assessment screened all plans and projects within 2km of the application site/s for potential impacts on the Solent marine sites and within 3km for potential impacts on the

Singleton & Cocking Tunnels SAC. These screening zones are considered acceptable.

The in-combination assessment concluded that there are no potential cumulative impacts on the Solent marine sites. The assessment identified one plan and four projects that could result in in-combination impacts on the Singleton & Cocking Tunnels SAC. These are:

West Sussex County Council and South Downs National Park Authority Joint Minerals Local Plan.
Potential for impacts to bat roosting and foraging habitat affecting Singleton & Cocking Tunnels SAC.

East Hampshire District Council Planning permission 55562/001 Land East of Horndean.
Substantial development of c.700 dwellings, employment land, school, Local Centre, Care Village, Sports facilities and parking. Proposal will affect habitats used by Bechstein's bats and therefore impacts to supporting habitat for Singleton & Cocking Tunnels SAC.

East Hampshire District Council Planning application 55562/005 Land East of Horndean.
Amended proposal for 55562/001. Increase in residential units to c.800 dwellings plus increased employment land and retail. Potential effects as per 55562/001

East Hampshire District Council Planning application 55562/006 Land East of Horndean.
Up to 85 age-restricted dwellings and associated infrastructure. Loss of SAC supporting habitat. Survey works ongoing.

Havant Borough Council Planning application GEN/18/01143 Land North of Long Copse Lane, Emsworth.
Residential development of c.230 dwellings plus infrastructure. Site is adjacent to known Bechstein's bat maternity roosts and high-quality habitat. Surveys works ongoing.

For the remaining plans or projects subject to in-combination assessment it has been concluded that either there is no potential for impacts or that there is sufficient strategic (i.e. contained with plan policy) or site-specific (i.e. agreed mitigation package with LPA and NE support) mitigation proposed such that any effects would be negated. The effects of local plan policies are such that impacts could not feasibly occur until such time that HRA is carried out and a mitigation package is agreed by the LPA and NE.

Would the proposal lead to a likely significant effect on European site integrity in-combination? YES

(If yes, continue to Stage 3)

Stage 3 - HRA – Appropriate Assessment

Test 2: the integrity test – If there are any potential significant impacts, the applicant must provide evidence showing avoidance and/or mitigation measures to allow an Assessment to be made. The Applicant must also provide details which demonstrate any long term management, maintenance and funding of any solution.

Chapter 9 of the submitted HRA includes details of mitigating measures designed to address the potential impacts identified during the screening assessment. These measures are summarised below:

Habitat loss

SPA/Ramsar supporting habitat.

There is potential for construction-related noise to result in functional habitat loss at two SWBGS sites in proximity to the Bedhampton & Havant Springs pumping station. These sites are within c.300m of the pumping station.

Proposed construction at the pumping station has potential to result in novel noise levels of c.87 decibels (dB) at a distance of 10m from the noise source. Given the distance between the noise source, and the presence of dense residential and commercial development and road and rail infrastructure between the application site and SWBGS sites, it is considered highly unlikely that construction noise disturbance will occur.

Singleton & Cocking Tunnels SAC supporting habitat.

The reservoir proposal will result in the loss of substantial areas of suitable Bechstein's and Western barbastelle bat habitat. This can be summarised as:

- c.13 Ha of semi-natural woodland to be removed.
- c. 18 mature veteran trees to be removed.
- c. 29 scattered broadleaved trees to be removed.
- At least four Bechstein's bat tree day roosts and one night roost removed.
- c.139 Ha of grassland removed.
- Impacts to c.3.7km of ephemeral stream habitat.

The proposals will therefore result in the permanent loss of Bechstein's bat roosting sites and extensive areas of habitat used for foraging, commuting and other behaviours. These impacts are considered to affect supporting habitat for the Singleton & Cocking Tunnels SAC.

Proposed mitigation, compensation, and enhancement

A number of measures are proposed for mitigating the identified impacts to bat habitat. These are summarised below:

- Obtain European Protected Species mitigation licence from Natural England.
- Timing of tree removal works to avoid periods of highest sensitivity.
- Supervised tree removal by licensed ecologist.
- Protection of retained habitat during construction.
- Updating bat surveys during 2021 in advance of any works.

The mitigation measures listed above are considered acceptable and will ensure that all activities are carried out under Natural England licence.

In order to compensate for the extensive loss of bat habitat and broad package of on-site and off-site habitat enhancement and creation measures are proposed. These are summarised as follows:

- On-site woodland enhancements within Havant Thicket (Forestry England owned), Bell's Copse (FE owned) and Staunton Country Park (Hampshire County Council owned).
- Off-site woodland and grassland enhancements within land north of Havant Thicket (East Hampshire District Council owned), Southleigh Forest (Portsmouth Water owned) and the Stansted Estate.
- Enhancements to watercourses in proximity to the proposed pipeline route.
- Capital Grants Scheme funded by PW to deliver off-site ecological enhancement projects, prioritising local initiatives to restore, create or enhance habitat connectivity in accordance with local planning policy priorities.

Between them these on-site and off-site measures aim to provide:

- New woodland linkages at Gipsies Plain and Deerslaughter Plain.
- Creation of 60 Ha of pasture woodland and 20 Ha of neutral grassland.
- 72 Ha of woodland enhancement within Southleigh Forest.

- Roosting habitat for Bechstein's bats.
- 5.5km of watercourse enhancement.
- £40,000 per annum for 30 years from 2029 towards Capital Grants Scheme.

Whilst acknowledging the extensive impacts arising from the proposals, it is considered that the above mitigation, compensation and enhancement measures provide for a substantial package of works that will provide a long-term benefit at the landscape scale for bat species associated with the Singleton & Cocking Tunnels SAC. Targeted woodland and grassland creation and enhancement works will improve the condition of habitat for bat species across a large area of the landscape. Combined with the Capital Grants Scheme focussing on enhancing the local landscape in terms of habitat connectivity.

Delivery mechanism

Details of the delivery mechanism for the overall mitigation package have been provided through the submission of an Implementation Plan (Atkins, April 2021). This provides details of:

- Memorandum of Understanding signed between Portsmouth Water, Forestry England and Hampshire County Council.
- Outline Biodiversity and Compensation Strategy submitted with current application to form basis for future submissions.
- Detailed Biodiversity Mitigation and Compensation Strategy submitted for each phase of works and to be agreed by the LPA and other key consultees.
- Ecological Mitigation and Management Plan for all pipeline works, submitted as part of detailed design and subject to agreement from key consultees.
- Full details of Capital Grants Scheme to be provided alongside detailed submissions and agreed by key consultees.
- All agreed measures to be subject to Section 106 agreement – ensuring that measures are enforceable and that monitoring systems (to agreed indicators) are included.

The Implementation Plan includes four Action Plans for the main elements of the overall mitigation package: Woodland Creation, Southleigh Forest, Ephemeral Streams, and Capital Grants Scheme. The Action Plans contain further details of the proposed location, baseline conditions, roles and responsibilities, site planning/preparation, delivery, and monitoring.

It is the view of Havant Borough Council and East Hampshire District Council that the submitted Implementation Plan provides for an appropriate mechanism for the delivery of an overall package of ecological mitigation, compensation and enhancement measures. The Implementation Plan and its four Action Plans provide a sufficient level of detail appropriate to the hybrid status of the applications.

It is acknowledged that further details of off-site compensatory measures will be provided at agreed stages. This is a logical approach and recognises the complex nature of the proposed development and the need for further investigations on the precise location and nature of mitigation.

Summary

It is concluded that the identified impacts from habitat loss on the Singleton & Cocking Tunnels SAC can be effectively compensated through the comprehensive package of mitigation, compensation and enhancement measures as detailed within the Outline Biodiversity and Compensation Strategy and Implementation Plan. These outline measures will form the basis of a detailed Section 106 agreement, enabling the Local Planning Authorities to have reassurance that all measures will be delivered and compliance monitored.

Local Plan Policy

The proposed developments are addressed through specific local plan policy.

Havant Borough Council

Policy KP9 of the Submission Havant Borough Local Plan and Policy CP26 of East Hampshire District Local Plan: Joint Core Strategy (2014) details the conditions of any planning permission for the Havant Thicket reservoir. Planning permission will be granted where:

- j. Changes to the natural and rural character are mitigated in particular by:*
- i. Limiting impacts on biodiversity including the creation of additional habitats to ensure*
 - ii. biodiversity net gain is secured;*
 - iii. Avoiding, mitigating and then compensating for the loss of, and effects on, Sites of*
 - iv. Importance for Nature Conservation (SINCs);*
 - v. Ensuring that the pipeline has no significant impact on Great Copse, protecting it during*
 - vi. construction;*
 - vii. Integrating the reservoir into the existing landscape of the area;*
 - viii. Minimising the loss of ancient woodland and trees and compensating for the loss of*
 - ix. irreplaceable habitat within a costed management strategy;*
 - x. A comprehensive mitigation strategy is secured for impacts to protected and notable species, including appropriate mitigation measures for Bechstein's bats in line with Policy E15.*
- k. The potential impacts on the Langstone and Chichester Harbours as well as the Hermitage Stream have been assessed under the appropriate regulations and any necessary avoidance and mitigation measures included in the scheme design;*
- l. Opportunities for biodiversity enhancements associated with the reservoir and the Hermitage Stream are realised wherever possible;*

East Hampshire District Council Policies in the East Hampshire Joint Core Strategy (2014) Policies CP20 (Landscape), CP21 (Biodiversity) and CP28 (Green Infrastructure) and the Havant Borough Local Plan policies E14 The Local Ecological Network, E15 Protected Species, EX1 Water Quality impact on the Solent European Sites, and E17 Solent Wader and Brent Goose feeding and roosting sites also provide details of the expectations for planning submissions. These policies provide a policy framework that ensures that planning permission will only be granted subject to specific conditions being met.

Water Quality

There is potential for proposed development to result in water quality impacts affecting the following European sites:

- Chichester & Langstone Harbours Special Protection Area (SPA).
- Chichester & Langstone Harbours Ramsar site.
- Solent & Dorset Coasts SPA.
- Solent Maritime Special Area of Conservation (SAC).

The proposed development will result in the loss and modification of watercourses that are hydrologically linked to Langstone Harbour and the above European sites.

Proposed mitigation, compensation, and enhancement

A number of measures are proposed for mitigating the identified impacts to these European sites. These are summarised below:

- Environment Agency (EA) consents will be obtained for the discharge of water from the development site. This will control the discharge of silt within surface or accumulated water during construction.
- Use of standard construction methods to control silt e.g. CIRIA guidelines.
- Construction Environment Management Plan (CEMP) will be produced.
- Drainage Management Plan (DMP) will be produced.
- EA licences for the outflow of water from the reservoir in order to maintain flows in local watercourses.
- Filtration (of silt, nitrates and phosphorous) via the created wetland habitat at the northern edge of the proposed reservoir.
- Compressed air mixing of water within reservoir control house to prevent phosphorous concentrations within reservoir.
- Decrease in nitrate loading to linked watercourses due to use of water from Bedhampton & Havant Springs.

These measures will ensure that surface and accumulated water leaving the site during construction and operation will be subject to EA permitting and that no such activities can occur until such permits are in place. The use of standard pollution prevention guidance, the CEMP and the DMP will be secured through planning condition and subject to enforcement as necessary.

In addition, the applicant (Portsmouth Water) has undertaken an assessment in accordance with Article 4.7 of the Water Framework Directive (WFD). Consultation with the Environment Agency (EA) has been carried out and the EA have provided detailed response to the submitted Article 4.7 WFD assessment. In summary, the WFD assessment includes details of:

- Long list of potential watercourse mitigation and compensation measures.
- Agreed short list of watercourse mitigation and compensation measures.
- Three mitigation and compensation packages.
- Confirmation that Package 2 was chosen as the most suitable option, delivering 5.5km of mitigation and compensation to local watercourses.

The EA have subsequently provided a detailed commentary on the Article 4.7 WFD assessment (EA, letter dated 30 March 2021). In summary, the EA state that they are content with Package 2 and recommend that this is secured by legal agreement. The mechanism for this will be via Section 106 agreement.

Whilst not linked to HRA, the parallel WFD assessment and subsequent EA comments provide an additional level of reassurance that there is an agreed package of measures that will provide appropriate mitigation, compensation and enhancement for ephemeral watercourses. The measures will ensure that the works will not result in degradation of the quality of freshwater inputs into Langstone Harbour.

Summary

The package of mitigation, compensation and enhancement works within the reservoir and pipeline footprints provide reassurance that impacts to water quality within the identified Solent marine sites can be mitigated.

Stage 4 – Summary of the Appropriate Assessment (To be carried out by the Competent Authority (the local planning authority) in liaison with Natural England

The findings of the HRA screening concluded that there would be a likely significant effect from the development on the integrity of the following European sites:

- Chichester & Langstone Harbours Special Protection Area (SPA).
- Chichester & Langstone Harbours Ramsar site.
- Solent & Dorset Coasts SPA.
- Solent Maritime Special Area of Conservation (SAC).
- Singleton & Cocking Tunnels SAC.

In accordance with the Habitats Regulations, East Hampshire District Council and Havant Borough Council undertook an appropriate assessment of the proposals.

The details of mitigation, compensation and enhancement submitted by the applicant within the following documents was reviewed:

- Habitats Regulations Assessment (Atkins/Portsmouth Water, September 2020)
- Implementation Plan for Off Site Biodiversity Mitigation and Compensation (Atkins, April 2021).
- Havant Thicket Reservoir Project – Environmental Statement Volume 4 – Appendix A15, Water Framework Directive Assessment.
- Outline Biodiversity Mitigation and Enhancement Strategy (ECOSA, September 2020).
- Technical Note – Article 4.7 WFD Short-listing methodology (Atkins, March 2021).
- Letter to Portsmouth Water - Havant Thicket Winter Storage Reservoir – Water Framework Directive (WFD) Article 4.7 (Environment Agency, 18 February 2021).

Based on the details within these documents, East Hampshire District Council and Havant Borough Council considers that there is sufficient information to conclude that potential impacts to European sites can be avoided, mitigated/compensated.

The mechanism through which mitigation, compensation and enhancement measures will be secured and delivered is acceptable: planning conditions for phases of development, and Section106 agreements.

It is concluded that the proposed development is therefore acceptable.

Natural England Officer: Jon Stobart

Summary of Natural England's comments:

Thank you for consulting Natural England on your Authority's Habitat Regulation Assessment (HRA) for the aforementioned applications.

Natural England agrees with both the scope of the HRA and conclusions of the Appropriate Assessment. Provided the full suite of agreed mitigation measures are secured then Natural England is satisfied that the proposals will not have an adverse effect on the interest features for which the sites are notified.

Regarding the detail of the appropriate assessment we would note the following:

- The appropriate assessment sections for both the Singleton & Cocking Tunnels SAC and Solent Habitats sites refers to "Proposed, mitigation compensation and enhancement". This is misleading as although the scheme provides compensation for the loss of Ancient Woodland it is not required in relation to the Habitats sites, where impacts on bat foraging and roosting opportunities and water quality are fully mitigated, thereby

avoiding the need for additional compensation measures.

- The primary purpose of the Capital Grants Scheme funded by Portsmouth Water is to provide long term compensation for the loss of Ancient Woodland. While the fund will also provide substantive benefits for local bat populations, most notably Bechstein's bat, it is not intended that the fund will deliver mitigation for the Singleton & Cocking Tunnels SAC . This point is relevant as the impacts to the supporting habitats for the SAC will happen at the commencement of construction of the scheme and not from 2029 when the grants scheme will come into effect. In our view irrespective of the grant scheme the timely delivery of the agreed onsite and offsite woodland restoration and habitat creation measures will ensure any impacts on local populations of Bechstein's and Western barbastelle bats that may use the Singleton & Cocking Tunnels SAC are fully mitigated.
- Natural England considers that the construction of the reservoir and its associated wetlands will also provide new functionally linked habitats that are likely to support wintering wildfowl populations that contribute to the special interests of the Chichester & Langstone Harbours SPA and Ramsar.
- The operational phase of the reservoir is expected to provide a welcome reduction in nitrogen loads to the Chichester & Langstone Harbours SPA / Ramsar and Solent Maritime SAC.
- The reservoir will provide a significant visitor attraction which would be expected to help draw recreational use away from the more sensitive areas of the Chichester & Langstone Harbours SPA / Ramsar and Solent Maritime SAC.

Should you require further information, or a more formal response then please do not hesitate to get back to me.