

Date: 22 April 2021  
Our ref: 349281  
Your ref: 51680/001



Lewis Oliver, Havant Borough Council

**BY EMAIL ONLY**

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Dear Lewis

**Planning consultation:** 51680/001. ADDITIONAL DOCUMENTS further to proposed hybrid scheme for reservoir development

**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 07 April 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 2 March 2021 and clarification about the northern access road.

Please note see our earlier responses dates 21 December 2020 and 2 March 2021 regarding comments on other issues associated with this planning application.

### **Alternative options for the design of the access roads**

Our earlier response recommended that the alternative access route through Dunsbury Business Park 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. Further information has been submitted on the access strategy, rat running and construction management.

As you are aware, the application will lead to a significant loss of irreplaceable habitat. In addition to the loss from the reservoir footprint, the northern access route is routed through ancient woodland and will have further direct and indirect effects on this irreplaceable habitat.

Paragraph 175c of the NPPF states that :

*175. When determining planning applications, local planning authorities should apply the following principle:*

*c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists*

In accepting the further harm associated with the proposed northern 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 and that there are 'wholly exceptional reasons' for this additional loss. We strongly recommend that the local planning authority satisfies itself that all less damaging alternative options have been fully exhausted.

We are aware that there are outstanding highways issues to be resolved regarding construction traffic along the northern access route. As these discussions evolve, we advise that the local planning authority is mindful of the additional direct and indirect impacts to ancient woodland arising from this access route. It is our advice that less damaging alternatives should be progressed in all cases unless there are wholly exceptional circumstances for an alternative approach.

### **Other biodiversity issues**

One further outstanding issue relates to the impact of the reservoir on skylark territories. We advise that a Skylark Conservation Plan is secured that ensures mitigation to fully address the impact to existing skylark territories during construction and operation. This may include new permanent options on the reservoir banks and other areas on site, where appropriate, as well as funding for an appropriate number of skylark plots per territory lost on neighbouring farms in the locality. This approach will ensure the impacts during construction and operation have been fully addressed.

Natural England would be happy to provide further advice as necessary.

Yours sincerely

Rachel Jones  
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Natural England, Thames Solent Team