

Dear Lewis,

APP/20/00990 | 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). | Havant Thicket, adjacent to Sir George Staunton Country Park, Reservoir and Pipe Line, Middle Park Way, Havant 21.0417

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). | Pipeline from Proposed Reservoir Site, Middle Park Way to land adjacent to, West Street, Havant 21.0134

Thank you for consulting me on these two applications. Thank you for your patience. Please find below amendments to comments I made on 7 January 2021, since which

time additional information has been provided that addresses queries I had raised. Additional information is provided within the Habitats Regulations Assessment completed by Havant Borough Council.

In summary, I am now confident that my previous queries have been addressed satisfactorily and that there is sufficient reassurance that proposed mitigation, compensation and enhancement measures can be delivered.

As you know I have been involved in detailed pre-application discussions with the applicant alongside Natural England and Forestry Commission officers, as well as having attended consultation events with other stakeholder representatives. These discussions have taken place over several years and I have a sound overall knowledge of the site, the scope of ecological studies undertaken, the predicted impacts, and the proposed outline ecological mitigation, compensation and enhancement strategy. The application is accompanied by detailed ecological information. I have carefully reviewed the Environmental Statement Chapter 2 Biodiversity (Atkins/Portsmouth Water, September 2020) and each of the habitat- and species-specific technical reports and appendices (ECOSA, various dates). I have reviewed the Outline Biodiversity Mitigation and Compensation Strategy (ECOSA, September 2020) and the Habitats Regulations Assessment (Atkins/Portsmouth Water, September 2020). In order to be concise I have attempted to comment in detail only on the most significant issues as I see them. The views of Natural England and the Environment Agency are critical in judging the overall acceptability of the scheme as proposed (in that there are separate licensing regimes for impacts to certain species and the water environment) and I may of course need to provide updated or amended comments in light of advice from other statutory consultees. I also recognise that there are likely to be changes to details of ecological impacts and mitigation measures as a result of other consultee comments, and that for a project of such scale there will be amendments required as the project progresses.

Scope of ecological surveys

Ecological assessments at the site have taken place over a considerable period of time and have at times been extremely focussed. I have no concerns over the scope, scale and standard of ecological assessments and I acknowledge the significant effort involved in assessing the ecological baseline over many years using expert technical advice. The robust baseline allows a greater level of certainty with respect to predicted impacts and is used to shape the overall ecological mitigation, compensation and enhancement package. I also acknowledge the applicant's willingness to undertake updating or new surveys at the request of key consultees, and the open sharing of information with me and others over several years.

Comment on overall impacts

A project of this scale cannot be realised without significant ecological impacts, and it is clear that there are substantial implications for the existing natural environment of Havant Thicket: the proposals would require the permanent loss of irreplaceable habitats such as ancient woodland and veteran/notable trees as well as substantial losses of other woodland, grassland, scrub and seasonal watercourses and other waterbodies. Impacts to habitats are summarised as follows: 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, c.139 Ha of grassland removed, and impacts to c.3.7km of ephemeral stream habitat. The surveyed area supports a range of protected species, including nationally-rare species of bat as well as badger, hazel dormouse, common reptiles, great crested newt, breeding birds and notable invertebrate species. The profound change of land-use would result in significant impacts to many of these species. Many of the impacts cannot be directly compensated on a like-for-like basis and there is an acknowledgement that mitigation, compensation and enhancement measures must be viewed as a whole package, many of the benefits of which may not be realised for many years, just as many of the impacts will be permanent or of long duration. Given the scale of the proposals there is necessarily a reliance on off-site measures which primarily entail woodland management interventions to enhance habitat. Some of the mitigation measures for certain species – bats and hazel dormice in particular – will require intensive hands-on interventions and long-term commitment from the applicant to ensure that species are protected in accordance with any European Protected Species licence conditions.

In summary, my overall conclusion is that despite very obvious significant impacts to the current nature conservation value of the site, the scheme as proposed is likely to deliver substantial biodiversity value in the medium-to-long term, albeit in a different form to the habitats that currently exist. The permanent loss of ancient woodland and veteran trees is essentially impossible to mitigate and so there must be a case made for overriding reasons (which are beyond the scope of my advice). These substantial losses can be mitigated to a degree by the proposed new woodland planting (linking Havant Thicket woodland and Staunton Country Park) and the extensive habitat creation and management works proposed for surrounding areas that will improve the ecological value of woodland, grassland and linear watercourse habitats for a range of species over time: there is no doubt that substantial biodiversity gains can be made through better management of the surrounding woodland.

Further details have been provided of proposed off-site mitigation, compensation and enhancement measures. These details are contained within the Implementation Plan for Off Site Biodiversity Mitigation and Compensation (Atkins, April 2021) as well as the Technical Note – Article 4.7 WFD Short-listing methodology (Atkins, March 2021) and accompanying Letter to Portsmouth Water - Havant Thicket Winter Storage Reservoir – Water Framework Directive (WFD) Article 4.7 (Environment Agency, 18 February 2021). These matters are discussed below.

Bats

Extensive bat survey works over a period of ten years has resulted in a robust understanding of the bat populations of the site and surrounding area. Data collected from the site and adjacent areas, as well as those collected for other development sites in the wider landscape, provide a very useful overview of the bat assemblage in context. Analysis of these data provide insights into seasonal trends and activity by location. Detailed discussion and interpretation of the results is included.

At least thirteen bat species have been recorded within the surveyed area. The most significant finding is the presence of the very rare Bechstein's bat, which has been shown to roost on site in small numbers (although not during the most recent surveys) and which uses the site for foraging, commuting and presumably social purposes. The application site clearly forms part of a much larger area of habitat used by the local Bechstein's bat population, and there is a likelihood that the south-east Hampshire population is functionally linked to larger populations in West Sussex: indeed, a link has been proven for the common and widespread Natterer's bat. Following discussion with Natural England, I agree with the applicant's assessment that there is a likely (but so far unproven) functional link between Bechstein's bat populations in this area of south-east Hampshire and larger populations associated with the Singleton & Cocking Tunnels Special Area of Conservation in West Sussex, approximately 15km east of the application site. Using a precautionary approach it is prudent to assume functional linkage between bat populations in these two areas and that impacts to bats and bat habitat within the application site would affect SAC supporting habitat.

I note the detailed analysis of data which appears to show that the application site itself does not support maternity roosts and that individual Bechstein's bats used the site for only a small percentage of time compared with off-site areas. Nevertheless, the importance of the site for this species is acknowledged. In terms of roosting bats, the site has been shown to support brown-long eared bat, Natterer's bat and Bechstein's bat. It is recognised that given the presence of woodland and trees on site it is highly likely that other bat species will roost also, and that bats continually change their roosting locations. The proposal will result in the loss of substantial areas of bat habitat in the form of woodland, trees and open grassland and will remove numerous trees with bat roosting potential.

Impacts to bat species will, at least in the short-term, be substantial due to woodland and grassland loss. In the longer term, the reservoir site (the open water, new wetland and grassland embankments) will offer suitable foraging habitat for a range of bat species. The proposed woodland enhancements will also offer new opportunities for bat species, as will the programme of roosting box installation (natural tree roost opportunities being generally scarce within surrounding forestry woodland and of course being reduced due to the loss of the Avenue). The proposed funding scheme should be focussed on securing meaningful landscape-level enhancements for bats

such as reconnecting habitats; details of these can be provided at a later stage and their delivery should be a key indicator of mitigation success.

I understand that the applicant has been discussing licensing matters with Natural England specialists and that a bespoke approach to licensing is required. In terms of the LPA's judgement on the Habitats Regulations derogation tests, in recognition of the exceptional nature of this project I am willing to accept that the favourable conservation status of bats can be maintained if the proposed compensation and enhancement measures can be delivered as proposed: the use of soft-felling techniques, the reuse of tree limbs with roost features, and the installation of bat roosting boxes in the wider landscape are all suitable methods of mitigation. This very much depends on the delivery of meaningful off-site improvements that will benefit the same bat population. On the deliverability of landscape-scale mitigation, compensation and enhancement measures for bats I have provided further comment below.

Due to the exceptional nature of this project there is an unavoidable degree of uncertainty over the efficacy of proposed compensatory and enhancement measures. The new woodland plantings at Gipsies and Deerslaughter Plains (already completed) provides useful linkage between areas of woodland habitat but will not approach a comparable condition to the lost habitat for some decades although their function as a habitat corridor/foraging area in the coming years is acknowledged. In essence, lost habitat is not being directly replaced (certainly not in the short term) but rather the carrying capacity/suitability of existing habitat is being enhanced through a range of measures. Aside from direct comparisons of area measurements it is not really possible to robustly equate areas of loss to areas of compensation/enhancement in a qualitative manner: the proposed areas of enhancement far exceed those of impact and so one must assume that there would be a beneficial effect overall. The whole package of on- and off-site mitigation, compensation and enhancement measures together does provide for a robust framework

This development will affect bats, European Protected Species (EPS) which receive strict legal protection under UK law by the Wildlife and Countryside Act 1981 (as amended) and under EU law by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (commonly referred to as the Habitats Regulations). Where developments affect EPS, permission can be granted unless the development is likely to result in a breach of the EU Directive underpinning the Habitats Regulations and is unlikely to be granted an EPS licence from Natural England to allow the development to proceed under a derogation from the law.

Will the development result in a breach of the EU Directive?

Yes, unmitigated, the development has potential to result in harm to individual bats and result in impacts to the favourable conservation status of bat species locally.

Is the development unlikely to be licensed?

An EPS licence can only be granted if the development proposal is able to meet three tests:

- 1. the consented operation must be for 'preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment'; (Regulation 53(2)(e))*
- 2. there must be 'no satisfactory alternative' (Regulation 53(9)(a)); and*
- 3. the action authorised 'will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range' (Regulation 53(9)(b)).*

It is for you as the case officer to assess the proposals against the first two tests – you may wish to ask for further information from the applicant. In order to assess the development against the third test, sufficient details must be available to show how killing/injury/disturbance of bats will be avoided and how any loss or damage to habitat will be compensated. In this case, I consider that sufficient information has been provided to assess impacts to bat populations. In terms of maintaining the favourable conservation status of bat species, the proposed mitigation, compensation and enhancement measures offer a comprehensive package of measures to avoid direct harm to roosting bats, to mitigate the impacts of habitat removal, to provide enhanced roosting opportunities on- and off-site and to provide substantial long-term landscape-scale habitat enhancements. This is an exceptional proposal and a bespoke approach is required. The application is supported by extremely detailed information on bats and the applicant has engaged in detailed discussions with Natural England licensing. On this basis I am confident that the favourable conservation status of bats overall can be maintained at the population level. As detailed below, I would recommend that full updated details of all bat mitigation, compensation and enhancement measures are provided alongside future applications for each phase of development.

Hazel dormouse

A population of hazel dormice is present, inhabiting woodland and scrub areas throughout the site. This is not surprising as the species is relatively widespread throughout Hampshire. The proposals will remove substantial areas of dormouse

habitat and have the potential to result in harm to individual dormice and the severance and fragmentation of dormouse populations. Mitigation includes standard two-phase habitat removal coupled with the capture, holding and soft-release of animals within enhanced habitat outside the site boundary. This is the only realistic option to avoid direct harm to dormice and acceptable in principle. My main concern would be the security of any animal holding pens at this site: the high levels of antisocial behaviour means that damage to pens and animals within is a clear risk.

This development will affect hazel dormice, a European Protected Species (EPS) which receives strict legal protection under UK law by the Wildlife and Countryside Act 1981 (as amended) and under EU law by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (commonly referred to as the Habitats Regulations). Where developments affect EPS, permission can be granted unless the development is likely to result in a breach of the EU Directive underpinning the Habitats Regulations and is unlikely to be granted an EPS licence from Natural England to allow the development to proceed under a derogation from the law.

Will the development result in a breach of the EU Directive?

Yes, unmitigated, the development has potential to result in harm to individual hazel dormice and result in impacts to the favourable conservation status of hazel dormice locally.

Is the development unlikely to be licensed?

An EPS licence can only be granted if the development proposal is able to meet three tests:

- 4. the consented operation must be for 'preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment'; (Regulation 53(2)(e))*
- 5. there must be 'no satisfactory alternative' (Regulation 53(9)(a)); and*
- 6. the action authorised 'will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range' (Regulation 53(9)(b)).*

It is for you as the case officer to assess the proposals against the first two tests – you may wish to ask for further information from the applicant. In order to assess the development against the third test, sufficient details must be available to show how killing/injury/disturbance of hazel dormice will be avoided and how any loss or damage to habitat will be compensated. In this case, I consider that sufficient information has been provided to assess impacts to hazel dormice. In terms of maintaining the favourable conservation status of this species, the proposed mitigation, compensation and enhancement measures offer a comprehensive package of measures to avoid direct harm to dormice, to mitigate the impacts of habitat removal, and to provide long-term landscape-scale habitat enhancements. The applicant has engaged in detailed discussions with Natural England licensing. On this basis I am confident that the favourable conservation status of dormice can be maintained at the population level. As detailed below, I would recommend that full updated details of all dormouse mitigation, compensation and enhancement measures are provided alongside future applications for each phase of development.

Birds

The main impacts will be from the loss of woodland and grassland habitat. The loss of grassland will result in the loss of breeding skylark and meadow pipit habitat. Lapwing used to breed more numerously at the site but numbers have dropped substantially in recent years, and the proposals would impact the single territory recorded in 2018. Other species impacted include woodland, scrub and grassland species such as song thrush, dunnock, linnet, warblers and tits. Mitigation will entail the removal of suitable habitat outside the nesting season. In terms of compensatory habitat, the new woodland/scrub plantings, the new wetland and grassland and the off-site woodland enhancements will provide new opportunities for a range of bird species, albeit mostly different species.

Reptiles

The grassland and scrub/woodland edge habitats across the site support all four common reptile species in good numbers. A substantial area of reptile habitat is to be impacted, requiring the capture and removal of potentially hundreds of animals from the site. Mitigation measures comprise capture and translocation of animals to enhanced areas within adjacent woodland. This is acceptable in principle, although I would not underestimate the practical difficulties in capturing and removing so many animals from the construction site.

Amphibians

Great crested newts (GCN) occur within ponds in the surrounding area. I would not consider the proposals to result in significant impacts to this species and am content with the proposed mitigation, compensation and enhancement measures.

This development will affect GCN, a European Protected Species (EPS) which receives strict legal protection under UK law by the Wildlife and Countryside Act 1981 (as amended) and under EU law by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (commonly referred to as the Habitats Regulations). Where developments affect EPS, permission can be granted unless the development is likely to result in a breach of the EU Directive underpinning the Habitats Regulations and is unlikely to be granted an EPS licence from Natural England to allow the development to proceed under a derogation from the law.

Will the development result in a breach of the EU Directive?

Yes, unmitigated, the development has potential to result in harm to individual GCN and result in impacts to the favourable conservation status of GCN locally.

Is the development unlikely to be licensed?

An EPS licence can only be granted if the development proposal is able to meet three tests:

7. *the consented operation must be for 'preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment'; (Regulation 53(2)(e))*
8. *there must be 'no satisfactory alternative' (Regulation 53(9)(a)); and*
9. *the action authorised 'will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range' (Regulation 53(9)(b)).*

It is for you as the case officer to assess the proposals against the first two tests – you may wish to ask for further information from the applicant. In order to assess the development against the third test, sufficient details must be available to show how killing/injury/disturbance of GCN will be avoided and how any loss or damage to habitat will be compensated. In this case, I consider that sufficient information has been provided to assess impacts to GCN. In terms of maintaining the favourable conservation status of this species, the proposed mitigation, compensation and enhancement measures offer a comprehensive package of measures to avoid direct harm to GCN, to mitigate the impacts of habitat removal, and to provide long-term

habitat enhancements. The applicant has engaged in detailed discussions with Natural England licensing. On this basis I am confident that the favourable conservation status of GCN can be maintained at the population level. As detailed below, I would recommend that full updated details of all GCN mitigation, compensation and enhancement measures are provided alongside future applications for each phase of development.

Invertebrates

The loss of extensive areas of woodland, scrub and grassland habitat will undoubtedly impact various invertebrate species. The loss of a significant length of seasonal stream habitat will result in impacts to some rare/notable aquatic invertebrate species. Mitigation for terrestrial invertebrates includes the overall woodland enhancements and it can be expected that the new wetland area will support invertebrate populations. In terms of mitigating impacts to the seasonal streams, I understand that discussions between the applicant and the Environment Agency has resulted in a scheme of off-site river restoration measures, entailing in-channel and riparian enhancements.

Overall comments on protected and notable species

There will be substantial impacts to a suite of protected and notable species, resulting in the loss of a considerable extent of semi-natural habitat. Given the scale and timescale of impacts there is essentially no scope for retention of meaningful habitat within the site. The bulk of mitigation is therefore related to salvage of individual animals from the construction footprint and the timing of operations to minimise impacts. The removal and translocation of animals such as hazel dormice and common reptile species is reliant on the availability of suitable receptor habitat within adjacent land.

I am content that species capture and translocation works will be undertaken in an acceptable way consistent with best-practice guidelines.

Overall mitigation strategy

The proposed outline mitigation and compensation strategy relies on several strands: the removal of certain protected/notable species from within the construction footprint; the use of habitat manipulation techniques to render habitat less suitable prior to construction; a commitment to long-term habitat management works in surrounding land; the use of artificial nesting and roost boxes; a commitment to substantial new grassland and pasture-woodland habitats off-site; the creation of new habitats within the developed site; enhancements to retained watercourses and waterbodies; and the establishment of a fund for ecological improvements.

I acknowledge the large scope and scale of the proposed mitigation and compensation measures and the efforts employed to date in ensuring that key stakeholders have been involved in their scope and design. Within the reservoir site itself the proposed land-use changes are so profound that it is essentially impossible to make meaningful comparative judgements between losses and gains that take full account of impacts to habitats, species and the local ecological network. Whilst recognising the significant ecological impacts arising from the proposal, there is no doubt, in my opinion, that there would be a significant biodiversity gain from a wetland habitat on such a vast scale and I very much welcome the proposed dedicated wetland habitat at the northern shore of the site. The wetland (containing open water, marsh, wet woodland, exposed muds and wet/damp grassland) will provide a valuable habitat for many species that do not currently occur as well as for many of the species already present. The benefits of the new reservoir and dedicated wetland area should be felt within the nearby designated Solent coastal habitats: it can be expected that bird species associated with the Solent SPAs (especially waders, wildfowl and terns) will utilise the reservoir and wetland. The additional habitat may assist in mitigating the effects of recreational pressure on the Solent intertidal and terrestrial habitats. The expected reduction in nutrient input to the Solent will also be of overall benefit.

The extensive enhancements to woodland habitat within the immediate surrounds and further afield are ambitious and would almost certainly provide benefits for a range of species associated with woodland, scrub and edge habitats. The delivery of enhancements is dependent upon a long-term commitment and partnership working with adjacent landowners. Woodland management operations should increase the availability of open areas such as rides and track junctions and also rotational coppice, suiting species such as invertebrates, birds and hazel dormouse. Post-construction, the reservoir embankments will provide valuable grassland habitat that will likely be of greater species-richness than the existing site. This habitat will be attractive to ground-nesting bird species that are to be impacted by the proposed works.

The site as proposed would undoubtedly be a significant visitor attraction and presents many opportunities for promoting the natural environment. The proposed visitor centre should act as a hub for visitors and is an excellent opportunity for public engagement and interpretation: I do not personally see an issue with this being situated at the water's edge and consider that this provides an excellent opportunity to engage the public as happens at many large wetland sites. It is hoped that public engagement activities will take place in future years. The landscaping areas surrounding the visitor centre offer an opportunity for further wildlife-rich habitat and I would expect that every opportunity is taken to embed biodiversity within the more formal areas of the site through the use of wildflower-rich grassland throughout as well as the provision of locally-relevant habitats such as acid grassland/heathland/bare ground.

Overall, I am supportive of the outline proposals for biodiversity mitigation, compensation and enhancement. Following consultation responses from myself and Natural England, further information has been provided on the scope, location, timing and delivery of off-site measures. These are contained in the submitted Implementation Plan and the four Action Plans contained within. In summary, proposed off-site mitigation, compensation and enhancement measures include:

- Creation of 60 Ha of pasture woodland and 20 Ha of neutral grassland.
- 72 Ha of woodland enhancement within Southleigh Forest.
- 5.5km of watercourse enhancement.
- £40,000 per annum for 30 years from 2029 towards Capital Grants Scheme.

The location for the creation of the pasture woodland and neutral grassland totalling c.80 Ha is yet to be confirmed, and it is stated that several options are being reviewed across the local landscape. I understand that one option entails woodland situated to the east of the application site. The scope of proposed works is detailed, with the stated purpose of enhancing the local ecological network by creating and enhancing woodland linkages. There is clearly work to do in determining the location and extent of these proposals but I am supportive of this measure.

Southleigh Forest is owned by Portsmouth Water. Much of the woodland is classified as Plantation on Ancient Woodland (PAW) and it is proposed to actively manage these areas, alongside areas of non-plantation ancient woodland, to improve habitat quality. A management plan is being devised by the Hampshire & Isle of Wight Wildlife Trust and will be funded by Portsmouth Water. The plan is being developed currently and will be subject to review and comment by key consultees.

A package of proposed enhancement works to various ephemeral watercourses has been agreed in principle with the Environment Agency s part of the Article 4.7 Water Framework Directive. These measures will provide enhancements to headwater streams north of the proposed reservoir as well as to several watercourses within the wider landscape to the south. The proposed measures include channel restoration of e.g. profile, banks, channel substrate; on-line ponds; improvements to other pond habitats; areas of plant translocation. It is the view of the EA that, subject to legal agreement, these measures will ensure that 5.5km of watercourses are enhanced and is sufficient to compensate for the identified impacts.

The proposed Capital Grants Scheme will provide c. £40,000 per annum for 30 years from 2029 onwards in order to deliver projects to enhance habitats in the local landscape.. An outline list of project objectives has been provided, focussing on enhancing the local ecological network, enhancing knowledge of protected species distribution and status, and providing equipment for local knowledge gathering. It is

proposed to establish a steering group to assess potential projects and monitor the scheme.

Overall, I welcome the submission of the Implementation Plan and Action Plans. These provide a useful level of further detail to demonstrate the scope of the proposed works and methods of delivery. I do acknowledge that there is uncertainty over the exact location and nature of some aspects but consider that these further details can be provided through future planning submissions and secured through appropriate legal agreements. I would suggest that, subject to the satisfaction of other key consultees, the submitted outline details form the basis for planning conditions. These should secure further full details for each recognised phase of works, the effect of which should be that works cannot proceed until all details are agreed. I have provided some draft condition wording below if this is useful.

The key issue is to ensure that for each phase of development there is a clear strategy for ecological mitigation, compensation and enhancement. The strategy should ideally be contained within a single document, of a consistent form, providing full details of the phase of development works and the ecological measures that will address any identified impacts. In recognition of the mix of on- and off-site measures, and the likely complex timing of delivery (with off-site measures being delivered in a rolling programme at various locations and times), any condition wording should allow for flexibility. An essential component is to have a 'running total' of mitigation, compensation and enhancement delivery in order that the applicant, LPA and other stakeholders can keep track of what is being delivered, where and by whom. I would strongly recommend the use of tabulated information and spatially-presented data.

No works within a Development Phase shall commence until full details of all ecological mitigation, compensation and enhancement measures (to be informed as necessary by up-to-date survey and assessment) and on-going monitoring of mitigation measures required for each reserved matters application (including both ecological works directly related to that Development Phase reserved matters area and any works associated with that area but lying outside of the boundary of that area) shall be submitted for approval to the Local Planning Authority. Such details shall be in accordance with the ecological mitigation, compensation and enhancement measures detailed within the Outline Biodiversity Mitigation and Compensation Strategy (ECOSA, September 2020), the Habitats Regulations Assessment (Atkins/Portsmouth Water, September 2020) and the Implementation Plan for Off Site Biodiversity Mitigation and Compensation (Atkins, April 2021. Any such approved measures shall thereafter be implemented in strict accordance with the agreed details and with all measures maintained in perpetuity, unless otherwise agreed in writing by the Local Planning Authority.

Reason: protect and enhance biodiversity in accordance with the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, NERC Act 2006, NPPF and Policy CS 11 of the Havant Borough Core Strategy March 2011.

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

Kind regards,

Tristan

Tristan Norton

**Senior Ecologist
Ecology Team**

Specialist Environment Services

Economy, Transport and Environment Department
Hampshire County Council
Elizabeth II Court West
The Castle, Winchester
Hampshire SO23 8UD
Direct Line: 01962 832335

Mobile: 07784 261774

E-mail: tristan.norton@hants.gov.uk; www.hants.gov.uk/biodiversity

Coronavirus (Covid-19)

Hampshire County Council's response to the Covid-19 is available here (<https://www.hants.gov.uk/socialcareandhealth/coronavirus>).

In line with Government advice to reduce non-essential travel and work from home where possible, Ecology officers are now working remotely. Whilst we will endeavour to conduct our services in a timely manner and to meet statutory timescales where we can, there may be some impact to the services we deliver. We will ensure that we keep all applicants / interested parties informed of any further impacts to our services should they arise. The Council's response also means that no non-essential site visits or face to face meetings will be undertaken until further notice. Essential and

contractual surveys may continue take place where there is no risk to the surveyor or the public, and in line with Government advice. This will be reviewed on an on-going basis.



Hampshire Services offers a range of professional consultancy services to partner organisations.

Specialist Environment Services provides data, advice and assessments for ecology, heritage and landscape.