

I am contacting you as a representative of the Woodland Trust as I understand you are presiding over the planning applications submitted to Havant Borough Council and East Hampshire District Council. Unfortunately, I am having to use my personal email address as the Trust is currently experiencing some difficulties with its servers and I am unable to access my work email system.

Therefore, I have been unable to access our systems, both emails and mapping systems for ancient woods and ancient/veteran trees, and therefore am unable to submit a response that is as detailed and thorough as would usually be submitted for such applications.

Nevertheless, please consider the following comments as the Woodland Trust's position on applications 51680/001 (East Hants DC) and APP/20/00990 (Havant BC).

As the UK's leading woodland conservation charity, the Woodland Trust aims to protect native woods, trees and their wildlife for the future. Through the restoration and improvement of woodland biodiversity and increased awareness and understanding of important woodland, these aims can be achieved. We manage over 1,250 sites covering around 23,000 hectares (57,000 acres) and have 500,000 members and supporters.

The Trust **strongly objects** to the applications in question as they will result in the loss, damage and deterioration of numerous areas of ancient woodland and also to a number of veteran trees, many of which appear to be located within the ancient woodland areas to be lost. The ancient woodland areas to be lost are:

- The Avenue;
- Middle Clearing;
- Round Wood;
- Unnamed Plantation Ancient Woodland Site (PAWS), part of Havant Thicket woodland complex.

Ancient woodland is defined as an irreplaceable natural resource that has remained constantly wooded since at least 1600AD. The length at which ancient woodland takes to develop and evolve (centuries, even millennia), coupled with the vital links it creates between plants, animals and soils accentuate its irreplaceable status. The varied and unique habitats ancient woodland sites provide for many of the UK's most important and threatened fauna and flora species cannot be re-created and cannot afford to be lost.

Ancient and veteran trees are a vital and treasured part of the UK's natural and cultural landscape, representing a resource of great international significance. They harbour a unique array of wildlife, such as saproxylic invertebrates, bats and certain species of birds, and echo the lives of past generations of people in ways that no other part of our natural world is able. Their ecological, cultural and historical value means that such trees are similarly recognised as irreplaceable habitats.

Both ancient woodland and veteran trees are afforded protection through the National Planning Policy Framework (NPPF), and through recommendations from Natural England

and the Forestry Commission in their standing advice for protection of such habitats (<https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>).

Paragraph 175 of the NPPF states: *“When determining planning applications, local planning authorities should apply the following principles: 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;”*

Exceptional reasons are defined in Footnote 58 as follows: *“For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.”*

We do not consider that the proposals for the reservoir and associated pipeline constitute a wholly exceptional reason and we believe that the applicant must do more to consider alternative locations for such a development. With the development due to result in up to 13.67 hectares of ancient woodland loss and 17 veteran trees, we believe that the applications in question are unacceptable and must not be afforded planning permission. This loss of irreplaceable habitat is highly significant for a single proposal as it would likely result in losses to local biodiversity, particularly those that rely on ancient woods and veteran trees for their habitat, including hazel dormouse, and various species of bats and birds. This could also set a harmful precedent of development resulting in unacceptable losses of irreplaceable habitat and every possible measure should be considered to avoid such harm.

In summary, the Trust **strongly objects** to these applications on account of the impacts on ancient woods and veteran trees. When possible, we intend to submit fuller comments regarding our concerns for the loss and damage of irreplaceable habitats.

Best regards,
Jack

Jack Taylor
Lead Campaigner - Woods Under Threat
Woodland Trust