

From: Norton, Tristan

Sent: 07 January 2021 14:25

To: Mansi, Julia

Cc: Oliver, Lewis

Subject: APP/20/00990 Havant Thicket, adjacent to Sir George Staunton Country Park, Reservoir and Pipe Line, Middle Park Way, Havant 20.1317

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 20.1317

Thank you for consulting me on this application. Thank you for your patience.

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. My comments here are therefore on the broad principles of the overall ecological strategy for the site, with views on specific elements where required.

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. 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): Natural England have requested further clarification on this issue. 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 management works proposed for surrounding areas that will improve the ecological value of woodland 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 but these measures need to be comprehensively set out. There is discussion of an off-site compensatory scheme involving the Hampshire & Isle of Wight Wildlife Trust (HIWWT), enabling the creation of a substantial area of grassland and pasture woodland habitat. In principle this is an encouraging proposal but further details of this, or any alternative off-site solutions that emerge, will be required. The commitment to a funded scheme of projects for third-parties is welcome. Further details of the funding available, and the terms by which projects will be chosen and their efficacy measured, will be required.

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. 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.

For Bechstein's bat, no direct link between the site and the Special Areas of Conservation in West Sussex has been established. However, I understand that a direct link has now been established for Natterer's bat. It does seem logical to assume that there would be a functional link between large Bechstein's bat populations in south-east Hampshire and West Sussex. The extent to which impacts at the proposed reservoir site would affect the Sussex bat SACs is essentially unknown at this point. If a functional link between Hampshire and Sussex Bechstein's populations is assumed,

then the loss of large areas of habitat (whether used for roosting, breeding or other purposes) could be seen as impacting the conservation status at a regional population level.

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. The potential impacts to bats are significant and 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 would like to provide comments once we have seen NE licensing's views. In principle however 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.

It is on the issue of habitat impacts that significant uncertainty lies: without sufficient details of the proposed off-site compensatory/enhancement measures the LPA is unable to determine if these are sufficient to mitigate the impacts arising from habitat loss on site. The new planting at Gipsies Plain provides a useful linkage between areas of woodland habitat but will not approach a comparable condition to the lost habitat for some decades (although its function as a habitat corridor in the coming years is acknowledged). Similarly, the proposed woodland management operations throughout the immediate surrounds are also welcome but it is unclear if this would offset the direct loss of habitat until further details of these interventions are provided. In essence, lost habitat is not being directly replaced but rather the carrying capacity/suitability of existing habitat is being enhanced. Aside from direct comparisons of area measurements it is not really possible to robustly equate areas of loss to areas of 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.

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.

Again, it would be most useful to understand the views of Natural England's licensing team on the proposed mitigation strategy. I expect that the proposed woodland management interventions (which are considerable in scale) will, in the medium-to-long-term, provide more suitable habitat for this species, and the provision of nest boxes will also assist. As with bats, it is difficult to qualitatively assess the effect of existing woodland enhancements when viewed in the context of overall habitat losses.

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 numerous 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, dunnoek, 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. Mitigation of impacts

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 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.

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 but consider that further details are required at this stage if the LPA is able to secure measures by condition. In common with the comments from Natural England, I would suggest that the following information is required prior to determination:

- Further details of any agreement between the applicant and third-party landowners that will provide reassurance that long-term habitat enhancements will be delivered – what is proposed, where will it be delivered, by whom and when?
- Further details of the off-site wood-pasture/grassland compensation scheme – location, timeframes, responsibilities, management/monitoring, predicted effects on habitats, species, ecological network.
- Further details of compensatory and enhancement proposals for off-site watercourses.
- Further details of the proposed Capital Grants Scheme.
- Further details of on-site, post-construction habitat management

I am not suggesting that full and comprehensive details of these measures are required at this stage, but at the least a detailed outline of each that can then be used as the basis for further detail as it becomes available. In terms of planning conditions, in recognition of the extended timeframe for development activities (several years for construction, then filling etc.) it would seem sensible to secure the outline details of ecological mitigation now and to have a mechanism that allows for further information to be submitted at agreed key phases. This would acknowledge the realities of such a project and provide for continuing discussion with key stakeholders as final design evolves. A monitoring and reporting strategy will be essential in order that the predicted benefits of the mitigation measures can be measured and, where necessary, further actions implemented. A management group/committee comprising various stakeholders seems to be a sensible option for the future.

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

Kind regards,

Tristan

Tristan Norton

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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.



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