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From: Woodcock, Matthew <Matthew.Woodcock@forestrycommission.gov.uk>
Sent: 10 March 2021 17:51
To: Havant Planning and Development Mailbox New
Cc: [REDACTED]
Subject: Havant Thicket, adjacent to Sir George Staunton Country Park, Reservoir and Pipe Line, Middle Park Way, Havant Reference: APP/20/00990
Attachments: Havant Thicket Res - FC advice to planners 10-03-2021.pdf

FAO Mr Lewis Oliver

Dear Sirs

Thank you for your letter of 24th February seeking the Forestry Commission's further advice on the above planning application.

Please find attached our advice which supplements that provided on the 14th December 2020. If you have any queries, or feel that an onsite discussion would be helpful, please ask and we will be pleased to help

Yours faithfully

Matthew Woodcock MBE

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Following government guidance about Coronavirus, I am working at home. You can contact me by email or my mobile number (though reception at home is temperamental).

Most Forestry Commission offices are currently closed. If you need to contact us about a grant, licence or other enquiries please contact the Admin Hub on: adminhub.buckshornoak@forestrycommission.gov.uk

www.gov.uk/coronavirus

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Craig Harrison

10th March 2021

Your References: East Hampshire: 51680/001 Havant: APP/20/00990

Dear Sirs

**Havant Thicket Winter Storage Reservoir – planning application
Manor Lodge Road, Rowlands Castle**

Thank you for your letter of 24th February seeking advice on the responses to the initial consultation. The Forestry Commission is pleased to offer the following advice as the Government's specialists in woodlands. This advice supplements the advice provided in our letter of 14th December 2020. We must reiterate that our role is distinct from that provided by Forestry England whose role is management of the public forest estate.

Government Policy is that ancient woodland is irreplaceable as highlighted in the recently updated **National Planning Policy Framework (NPPF) Para 175 (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.*

We should also reiterate that while we appreciate the water resources drivers for the reservoir we would advise that any loss of ancient woodland should be restricted to that which is essential to the reservoir itself i.e. the direct footprint of the reservoir and dam. Loss due to associated activities would not seem to meet the 'wholly exceptional' description quoted in the NPPF.

Having reviewed the documentation which has been submitted since our initial response of 14th December 2020 (and which appears on the Havant Planning website at this date) we advise:

1. **Northern Access Road** - where proposals would have significant impact on ancient woodland:
 - a. Alternative routes which avoid or significantly reduce the impact on the ancient woodland do not appear to have been considered;
 - b. Proposed route:
 - i. emphasis has been made that the access proposals follow the route of an existing track within Havant Thicket managed by Forestry England and

suggestions have been made as to how the impacts could be reduced; however

- ii. reference to the section of ancient woodland between Havant Thicket and the B2149, where no hardened track currently exists, relates only to its junction with the B2149; no analysis seems to have been provided as to the impacts of the proposals on this area of ancient woodland where the grove of ancient yew trees and the historic 'park pale' would appear to be impacted.

2. **Compensation and mitigation:**

- a. **Compensation for loss of ancient & semi-natural woodland:** If the council/s were to decide to approve the reservoir proposals there will be a loss of ancient woodland. We advise that a substantial amount of new woodland should be established as compensation. We do not suggest an area 'ratio' based on the area of ancient woodland lost but suggest that the compensatory woodland should deliver significant ecological value. We note Portsmouth Water's response to Natural England's comments and reference to 60 ha of woodland/wood pasture creation. It is not yet clear where this compensatory woodland would be located so must advise that:
 - i. A proportion of the compensation should be woodland (as distinct from woodpasture which delivers appropriate compensation in other respects) to compensate for the loss of ancient woodland and this should deliver significant ecological value;
 - ii. If this/these new sites are not considered in detail as part of the planning application then they will constitute afforestation proposals under the Environmental Impact Assessment (Forestry) Regulations <https://www.gov.uk/guidance/environmental-impact-assessments-for-woodland-overview> and as the relevant authority the Forestry Commission's advice would need to be sought to determine whether such afforestation proposals constitute relevant projects under these regulations. We must also advise that if the wood pasture areas comprise greater than 20% canopy cover at maturity they would also be subject to the Forestry EIA Regulations.
- b. **Mitigation/compensation within existing woodland** – Havant Thicket and Southleigh Forest: While enhancing the management of these woodland sites is highly commendable we advise that work considered as mitigation or compensation should be distinct from that which would be considered good woodland management. Any such work should respect the ancient woodland character in particular soils and ground flora. For woodlands of this scale we recommend preparation of a Woodland Management Plan (the Forestry England equivalent is a 'Forest Design Plan') <https://www.gov.uk/guidance/create-a-woodland-management-plan> Such plans help identify the particular features of the woodland, any key threats (such as invasive species, herbivore pressure impacting ground flora and/or natural regeneration or disease), appropriate management and when approved by the Forestry Commission include appropriate felling licences.

c. **Mitigation for increased public impact on existing woodland:**

Understandably the proposals would enhance the public recreation pressure on the site and the benefits that would bring to local people. However, such access will require management which we advise should be considered in any mitigation package.

We very much appreciate the many and diverse aspects which are encompassed in a project such as this. We have focused our advice on aspects relating to trees and woodland. We remain happy to discuss proposals further and help identify opportunities to compensate and mitigate for adverse impacts and optimize the positive impacts.

Yours faithfully



Matthew Woodcock
Partnership & Expertise Manager South East