

**SDNPA Consultation Response
Havant Thicket Reservoir
EHDC ref: 51680/001 FUL
HBC ref: APP/20/0990 and
APP/20/0991**



12 January 2021

Dear Mr Oliver,

Thank you for your letters dated 16 November 2020 requesting the South Downs National Park Authority's views on the development of the site known as Havant Thicket. The purpose of this SDNPA response is to consider the impact of the proposed development on the setting and statutory purposes of the National Park, which are:

- 1) To conserve and enhance the natural beauty, wildlife and cultural heritage of the area;
- 2) To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

This will be to support Havant Borough Council and East Hampshire District Council in their duty to have regard to the impact of the development on the Purposes of the National Park, as required under S11A of the National Parks and Access to the Countryside Act 1949 (as inserted by S62 of the Environment Act 1995).

Summary

Both the Havant Borough and East Hampshire District Local Plans include policies relating to the safeguarding and allocation of this site for use as a reservoir, which are also being carried forward as part of their current reviews. The SDNPA has provided comment on pre-submission versions of both Local Plans, supporting the principle of these allocations.

The SDNPA have been involved in pre-application discussions since 2018 and is a member of the applicants' Havant Thicket Reservoir Stakeholder Group. It is recognised that the application site is allocated as part of both Havant Borough Local Plan 2011 and East Hampshire District Local Plan 2014 and the SDNPA does not object to the principle of the allocation and what the policy seeks to provide on the site. However, there are aspects of the scheme which the SDNPA consider require further information or clarification prior to the determination of the application. Further comments are provided below.

Water resources and need for a reservoir

The SDNPA recognises that the South East as a region is a highly water-stressed area, notwithstanding the surplus that Portsmouth Water benefits from. Addressing the existing and future pressures on water resources in the region will need to be via a number of measures including a focus on water conservation. The need for a reservoir is part of a package of measures identified in the long term WRSE plan, and the general principle of water abstraction and storage of an otherwise under-used supply has clear benefits when compared to summertime abstraction from sensitive sources, such as the River Itchen.

The SDNPA would be interested to know if there are opportunities to further manage abstraction at Portsmouth Water sites within the National Park, as part of this wider package (although it is acknowledged that any issues with abstraction are separately addressed via the Water Industry

National Environment Programme); for example, the existing abstraction site on the River Ems at Walderton, which is approximately 6.5km from the application proposal.

Landscape and Visual Impact

Our comments on this matter are limited to how the proposed development relates to the SDNPA in terms of landscape character and visual impact. The proposed northern access arrangements are likely to have the most significant impact, given their close proximity to the SDNP boundary, and these are considered in more detail below.

The remainder of the site is more distant from the SDNP, with intervening woodland, although there may be glimpses of the reservoir from higher ground within the Park and glimpses towards the Park from the south-western part of the proposed reservoir bank. On this matter the viewpoints selected within the applications Landscape and Visual Impact Assessment are broadly representative of views from the SDNP.

Matters relating to landscape character, in particular the proposed mitigation works, are covered in the Biodiversity and Nature Conservation section below.

Vehicular Access

There are 2 vehicular access points proposed; one to the north and another to the south.

The proposed northern access road would utilise an existing minor access track from the B2149, with the SDNP boundary running along the opposite side of the carriageway. The SDNPA welcomes the changes to this access point from that proposed at pre-application stage, with the removal of the significant junction control methods. The character of this access is of a much simpler scale and more reflective of the rural character in which it is situated. There appears to be an opportunity to reduce the speed limit in this location, without any significant infrastructure changes. The SDNPA would welcome the opportunity to comment on signage and any other highway paraphernalia proposed in association with the new access, at the appropriate time. Overall, the SDNPA does not object to the proposed access route in terms of the impact on landscape character and in views from the Park.

In terms of the construction of the route, it is noted that efforts will be made to limit impact on the Ancient Woodland through which it passes and that it will remain a single lane with passing places. Following the construction period, these laybys could be reduced, using Ancient Woodland soils translocated from the reservoir location. This method is broadly supported, however the SDNPA would want to be made aware of any amendments and to see further details of the method of construction and any proposed changes between construction and operational phases, when available.

Appendix A13 of the Environmental Statement details a number of route options that would have avoided wholly or in part the Ancient Woodland, including Option 6 which would utilise the vehicular access for the new residential development to the north. These options, including the preferred route score similarly within the options assessment in terms of environmental impact (Option 6 perhaps having a greater adverse visual impact), but the preferred option 2 scoring better both in respect of the project drivers and from an engineering perspective. Both Natural England and the Forestry Commission have raised concerns regarding this optioneering exercise and requested that the alternative routes are explored in more detail. Should further information be submitted in this regard, the SDNPA would like the opportunity to review and provide further comment.

It is noted that Highways England has requested a Construction Traffic Management Plan and we would recommend that alongside this, a Construction Worker Travel Plan should be secured, to reduce those arriving by single occupant private cars. There appears to be many opportunities, given the location, for how this could be achieved, e.g. minibus, public transport.

The SDNPA has no further comments to make in respect of southern point for vehicular access.

Biodiversity and Nature Conservation

The project as a whole seeks to deliver considerable biodiversity gain, which is welcomed by the SDNPA. In particular, the range of wetland habitats will be a valuable addition. In order to ensure that this is protected it is recommended that intensive recreational use and dog-walkers should be directed away from this area (through the provision of alternative, suitable spaces elsewhere within the site).

It is noted that the works required to enable the existing northern forestry access track to be used by vehicles in association with the reservoir and associated facilities will involve the removal of further trees within an area of Ancient Woodland, and concerns have been raised by both Natural England, Forestry Commission and Forestry England. The loss of trees in this area, as well as through the creation of the reservoir itself, is regrettable. The loss of irreplaceable ancient woodland can only be permitted in exceptional circumstances. Whilst the significant tree planting that has taken place is welcomed by the SDNPA, compensation planting for ancient woodland should be carried out at an appropriate ratio. To off-set the loss in this location, it is likely that additional planting off-site will be required. As noted in the section above, the translocation of woodland soils from the reservoir would be required to facilitate this, with a detailed method statement to demonstrate appropriate storage of the soils.

It is noted that 110 hectares of compensatory measures are being proposed, of which 80 ha would be woodland pasture. Further to this, up to 75 ha of restoration works within Southleigh Forest are proposed. The latter aspect in particular, is welcomed and we would also welcome the improved management of the areas around Southleigh Forest as well. The Southleigh Forest area crosses the administrative boundaries between Hampshire and West Sussex (as well as part of it being within the National Park) – it is not clear whether Sussex Wildlife Trust also been engaged in discussions to ensure the mitigation and compensation packages are representative and responding to all relevant objectives. If this has not been the case, it is strongly advised that SWT are also engaged.

The SDNPA would also like clarification on how the mitigation and compensation works would be secured, as well as further details of these works, and reserve the right to comment further when additional information has been received.

Non-motorised Access and Recreation

The application provides many benefits for informal recreation around the new water body, with opportunities for future recreational use on the water as well. The scale and nature of the provision proposed appears to be appropriate.

Opportunities for cycling and horse riding around the site are welcomed, including replacement of the bridleway that would be lost. However, little detail has been provided regarding the width/use of these routes.

The availability of horsebox parking in the area is limited; consideration could be given to the provision of a designated area for horseboxes. Cycle parking should also be provided in a range of appropriate locations across the site, rather than just within proposed car parks.

There are significant opportunities to improve access for non-motorised users (NMU) to the site from key gateways close to the application site, and in turn to improve access between the site and the National Park. There is little mention of how the proposal links to the existing public transport network, nor how opportunities to create NMU links to new residential development (towards Horndean), as well as existing residential areas, have been explored. EHDC and HBC both have sustainable transport strategies, as does the SDNPA, and we would like to see further information and details of how these are being integrated in terms of getting to the site, within the scheme.

Conclusion

Whilst the SDNPA supports the principle of the proposed development, it considers that there is further information and clarification required, as set above, prior to the determination of the application. The SDNPA would also welcome the opportunity to comment at reserved matters stage, particularly with regard to the education offer, access routes and the visitor centre.

If you have any further questions, please do not hesitate to contact Vicki Colwell (vicki.colwell@southdowns.gov.uk, tel: 01730 819280).

Yours sincerely,

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