

Consultation Response

To: Lewis Oliver
From: Jennifer Winter, Senior Planning Policy Officer
Date: 29 January 2021
Re: 51680/001

Location: Havant Thicket Winter Storage Reservoir, Manor Lodge Road, Rowlands Castle

Proposal: 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 (MI), to support the planned bulk supply transfer of at least 21MI/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). |

The planning application should be determined in accordance with the development plan, unless material considerations indicate otherwise. Policies that are relevant to the application are referred to below and may be found in the following development plan documents:

- East Hampshire Joint Core Strategy, adopted 2014
- East Hampshire Local Plan Second Review, adopted 2006

Attention is also drawn to the Council's Draft Local Plan 2017-2036.

It is worth noting that the application crosses the administrative boundary of East Hampshire District Council and Havant Borough Council. The majority of the proposed reservoir, the visitor centre, children's playground and car park lie within Havant Borough Council.

Within East Hampshire District lies the vehicular northern access point off the B2149, cycle and pedestrian access from Manor Lodge Road, pedestrian access from the east of the site, Forest Bere Car Park Access as well as a network of footpaths, cycle routes and bridleways along the eastern part of the proposed reservoir including the wetland area.

The key concerns relating to the proposal are as follows:

- Biodiversity/Ecological impact
- Transport

Key Policies from Development Plans

The policies that are therefore relevant to the proposal within East Hampshire are:

CP20 - Landscape
CP21 – Biodiversity
CP23 – Gaps between settlements
CP26 – Water Resources/Water Quality
CP28 – Green Infrastructure
CP30 – Historic Environment
CP31 – Transport
CP32 – Infrastructure

Overview

The proposed land is identified in Policy CP26 of the Joint Core Strategy as land to be safeguarded from development for the creation of a new winter storage reservoir. East Hampshire District Council recognizes the importance of meeting the future demand for water, whilst I note that the need for the reservoir has been outlined in the applicant's planning statement. Reference is made to the fact that many areas of the South East are classified as 'seriously water-stressed' by the Environment Agency (paragraph 4.14, planning statement). It is understood that water from the reservoir would be transferred to Southern Water, to help meet the demand for water within its catchment area, in the context of increasing population growth, the effects of climate change and the imposition of tighter limits for the abstraction of water in the River Itchen and the River Test catchments.

In addition to addressing water resource needs, the proposed development would create a new visitor attraction that could complement the facilities of Staunton Country Park. However, I note that the development would result in the loss of ancient woodland and result in a permanent change in landscape character within a defined gap between settlements. The following comments are offered in relation to these and other matters that are significant for planning policy in East Hampshire.

Water Resource

Policy CP26 states: "The site identified for the Havant Thicket reservoir will be safeguarded from development (see Map 3)". The supporting text at paragraph 7.50 of the JCS says "East Hampshire recognises the importance of implementing this approach by promoting efficient use of existing water resources, while recognising the development of new water resources, such as the Havant Thicket Winter Storage Reservoir. This reservoir will not only provide further water resources but will provide a real opportunity to create a natural and sustainable recreational attraction. The timescale for the provision of the Havant Thicket Winter Storage Reservoir is uncertain and will depend on future regional forecasts of demand for water."

The proposed land is also identified in Policy UI2 within the Local Plan: Second Review (2006) for a reservoir. The supporting text says: "Land south of Havant Thicket, Rowlands Castle which extends into Havant Borough Council and is owned by Portsmouth Water Company, is identified in the Local Plan as being reserved for a reservoir which is likely to come forward in the Plan period. The ecological constraints that apply on the site and the impact on existing tree cover will have to be carefully considered when the detailed proposal for the reservoir, whose precise area is unknown, comes forward. The potential for recreational use will also be encouraged."

In line with Policy CP26 and saved policy UI2, the proposal for a winter water storage facility is supported, subject to the other policy considerations detailed below. The proposal also includes the creation of a network of footpaths, cycle routes and

bridleways along the edge of the reservoir as well as places for bird watching. These recreational opportunities are also supported by Policy CP31 and saved Policy UI2. The Council's Draft Local Plan 2017-2036 also recognizes the potential for a new reservoir at Havant Thicket, through its Policy S31. This policy proposes a site for a winter water storage facility to meet the demand for increased water supply in the south-east in the future, including a network of paths for walking, cycling and horse riding.

Biodiversity

The proposed development includes the loss of important habitats and biodiversity, including Sites of Importance for Nature Conservation (SINCs) that comprise areas of ancient woodland. In policy terms, policies CP20 (Landscape), CP21 (Biodiversity) and CP28 (Green Infrastructure) are particularly relevant to this proposal.

Policy CP21 requires development proposals to maintain, enhance and protect the District's biodiversity and its surrounding environment. However, the proposed development includes the loss of SINCs, which is contrary to criterion a), part iii) of CP21. The proposed loss of ancient woodland and veteran trees would also count as the loss of irreplaceable habitat (paragraph 175 of the NPPF). I note that Natural England has confirmed that net gain cannot be achieved in relation to these assets, and that further information has been requested from the applicant, to determine whether a net gain to biodiversity would be achieved overall. The achievement of an overall net gain in biodiversity is important for meeting the requirements of criterion d) of CP21. It will be important to follow the advice of Natural England and Havant Borough Council's ecologist on this matter.

The NPPF (paragraph 175) states that development resulting the loss of ancient woodland and veteran trees should be refused, unless there are 'wholly exceptional reasons' and a suitable compensation strategy exists. I note that the applicant's planning statement summarises a case for determining that the public benefits would outweigh the loss of the habitat. The planning statement also references proposals for extensive planting of woodland, trees, hedgerows and wildflowers, as well as new wetland habitats. It will be important to ensure that adverse impacts on biodiversity can be appropriately mitigated and that compensatory measures have been shown to be the last resort to meet the requirements of criterion d) of CP21.

Overall, the proposal has some potential to meet criteria c), d) and e) of Policy CP21 – depending on expert advice concerning the applicant's proposals for mitigation and compensation – but will not meet part a) of CP21 in respect of maintaining, enhancing and protecting SINCs in East Hampshire. As noted above, the SINCs that would be lost due to the reservoir's development include areas of ancient woodland. The material considerations established through paragraph 175 of the NPPF and the relevant submissions on the biodiversity mitigation and compensation proposals should be therefore be taken into account, in determining whether there are overriding reasons to support the development.

I also note that the proposals are also thought to have beneficial impacts on nutrient discharges to the Chichester and Langstone Harbours SPAs. The potential for improvements to water quality could help to enhance these internationally important habitats, thus helping to reduce the degree of conflict between the proposal and part a) of Policy CP21.

Transport

The proposal includes one vehicular access point within East Hampshire including the creation a new junction off the B2149, utilising an existing narrow track through an area of Ancient Woodland. A range of new cycle and pedestrian links are also proposed, which would improve the recreational opportunities at the new reservoir. It appears that an existing bridleway crossing the site and linking with Manor Lodge Road would be lost, but that alternative provision would be made for users of this route.

Policy CP31 requires development proposals to protect and provide safe and convenient cycle and pedestrian links that integrate with existing cycle and pedestrian networks (criterion b). New infrastructure for vehicular access must be compatible with improving highway safety (criteria c) and d)), whilst accessibility by public transport modes should be enhanced (criterion a)). Please note that East Hampshire's Vehicle Parking Standards SPD does not have specific parking standards for visitor centres, or for large recreational opportunities such as the Havant Thicket reservoir proposal.

Comments from Hampshire County Council as the Highways Authority should be considered in the context of the applicant's Transport Assessment findings and the requirements of Policy CP21, such as those highlighted above. The supporting text to Policy CP31 states "Walking and cycling need to be promoted as a means of access to jobs, facilities and services but also as a recreational opportunity with a positive impact on physical and mental health (see Policy CP18)." The proposed improvements to local walking and cycling opportunities are therefore supported in terms of supporting physical and mental well-being in East Hampshire.

Other Matters

With regards to other matters, the site falls within and identified gap between Rowlands Castle and Havant. Policy CP23 aims to protect the generally open and undeveloped nature of this gap to prevent coalescence and to retain the separate identity of settlements. It is considered that the type of development proposed; the large water body and green infrastructure have a low urbanising effect on the landscape and therefore would not compromise the integrity of the gap nor result in coalescence of the two distinct settlements.

Policy CP20 (Landscape) requires that the setting of the South Downs National Park, as well as local distinctiveness and sense of place, are conserved and enhanced by

development (criteria a) and b)). This policy also extends protection to distinctive landscape features, such as trees, woodlands and water bodies (criterion d). I note that as part of the assessment of alternative sites for the reservoir, several have been dismissed because of visual impacts, including on views from the South Downs National Park (planning statement, pages 26-27). The natural topography of land at Havant Thicket, allowing the reservoir to sit within the landscape with limited visual impact, has been identified by the applicant as a reason for the current site selection (planning statement, paragraph 4.47). As noted previously, land is safeguarded in the Joint Core Strategy for the development of a winter storage reservoir. Provided that suitable mitigation and compensation measures are put in place to limit landscape impacts, by (e.g.) enhancing natural landscape features adjoining the reservoir, the principle of a new reservoir in this location can be supported in terms of CP20.

CP30 (Historic Environment) requires development to conserve, enhance, maintain and manage the district's heritage assets and their setting (criteria c). However, the proposed development lies within a Conservation Area and includes the partial loss of The Avenue, a grade II* Registered Park and Garden which is contrary to criteria c of CP30 and paragraph 194 of the NPPF. I note that the applicant's planning statement summarises a case for determining that the public benefits would outweigh the impact on the Historic Environment and includes measures to reduce the impact, stating that the significant views within the Registered Park and conservation area would be preserved and where there are impacts, sensitive design and opportunities for interpretation and enhancement will maintain the significant connection between the historic and current landscapes. I note that Historic England conclude that the impact of the reservoir on the registered park and conservation area has been limited to the loss of part of the Avenue and a small change to long views over Leigh Water from the listed terrace, which can be justified by the need for water resource. In the context of this expert advice, I am content that although the proposal does not meet criterion c) of Policy CP30, the impacts on cultural heritage would not be sufficient to outweigh the benefits of the proposal from a water resource and recreational perspective.

Conclusion

Based on the above, Planning Policy supports the principle of developing a new water storage reservoir at Havant Thicket, for reasons of securing water resources to meet future demands. Planning Policy also supports the recreational benefits alongside the reservoir, including the proposed network of footpaths, cycle routes and bridleways. However, concerns are raised in relation to the loss of SINC's, areas of ancient woodland and veteran trees, in terms of Policy CP21 of the Joint Core Strategy and the NPPF. It will be important to demonstrate that the potential impacts on biodiversity have been appropriately considered, mitigated and (where necessary) compensated for, taking into account the NPPF and Natural England's consultation response.

End of comments.