

Lewis Oliver
Havant Borough Council
East Hampshire District Council
via Email

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Dear Lewis

Planning Application refs: APP/20/00990, 51680/001 Hybrid application for development of a reservoir for raw water storage etc, and **APP/20/00991** Outline application for development of a new pipeline to transfer water from Bedhampton Springs to fill the reservoir.

Location: Havant Thicket, adjacent to Sir George Staunton Country Park, Middle Park Way, Havant

We would like to thank Natural England for their comments and feedback on the above applications in their consultation response dated 19th December 2020. We welcome their acknowledgement of the importance of long-term regional water resource planning and also their confirmation that they are satisfied with the extensive survey effort undertaken and mitigation proposed. Considerable work has gone into the design of this project in order to minimise impacts on the environment. Through its evolution, from site selection to the design stage, it has been environmentally led, and every effort has been made to minimise the site impacts. However, as with any project of this scale, there will be changes to the local environment, and in response to that, what we consider to be an ambitious but deliverable mitigation and compensation package, has been designed and we are committed to delivering the measures detailed in the Mitigation and Compensation Strategy.

The main driver for this project is a forecast deficit in regional water resources, and the urgent need for Southern Water to find alternative water sources, than the existing drought orders and permits in place on the River Itchen Special Area of Conservation (SAC) and the River Test Site of Special Scientific Interest (SSSI). Through this process other potential future supply options need to be considered, but many of these options may never come to fruition, nonetheless it is important that all options are fully scrutinised, with the most efficient taken forward. As such, the need for the reservoir has been identified as part of an existing supply issue that fits within a compliance timeframe determined by the Environment Agency. Other potential uses of the reservoir, or supply options, such as RAPID, may never be taken forward, and therefore should not be considered when deliberating this current application.

The proposed reservoir will provide 14% of the forecast deficit required to avoid adverse effects on the integrity of the highly designated chalkstreams. Once constructed, the Havant Thicket reservoir will become an operational asset for Portsmouth Water, and there is willing commitment to deliver, and expand, the mitigation and compensation package, both on site and in the wider area, thereby contributing to the local Nature Recovery Network. To date there has been extensive engagement with local landowners and work is now starting to refine the various options available, to deliver some meaningful mitigation and compensation measures.

Alternative locations for reservoir and design options

Natural England has stated that they are aware of alternative access options and strongly recommends that these are explored to further reduce impacts on ancient woodland. In addition,

concerns have been raised with regard to buffering remaining areas of woodland that will not be impacted by the proposals.

Through the design process 11 potential access routes were assessed, the details of which are provided in the Access Route Options Appraisal, which is included as Appendix C of the Transport Assessment Report (Appendix A13 of the Environmental Statement). The options were assessed against environmental, engineering and project drivers. Overall, the options to access the site from Swanmore Road to the south via Dunsbury Park Business Park scored highest, however Portsmouth City Council, who own and manage the business park, will not support a route through the business park due to the likely significant impact on its users. The access options to the north and west all had potential environmental, safety or traffic impacts but the option along the existing forestry track along the western edge of Havant Thicket was the next highest scoring viable option after the Dunsbury Park option, it also secured the most support from local residents as it avoids the need for traffic to pass through Leigh Park and Rowlands Castle. In addition, this route was favoured since it would not fragment the woodland or create a significant disturbance in the centre of it.

In response to the 2020 consultation, a new approach was developed to vehicular access combining the north access along the forestry track along the western edge of Havant Thicket and a southern access off Swanmore Road to 'dilute' the impact of the construction and visitor traffic that will use either route, and reduce the loss of ancient woodland by halving the width of the proposed northern access route into the site. The route has been designed to follow the existing track for the majority of its length and loss of trees and woodland habitat has been reduced as far as reasonably practicable in preliminary design. In reality this means that 12 trees, comprising invasive and lower category trees, will be lost along the whole route, with proposed passing places aligned with existing wide areas or where other forestry tracks meet. Potential impacts would largely be restricted to construction activities, such as soil compaction, changes to air quality from construction traffic and dust and would therefore be short-term habitat degradation. Ancient woodland soil arising from loss elsewhere will be used to form the road embankment slopes. Further studies will be undertaken to assess the feasibility of further reducing the woodland take by employing a "dig down" construction rather than a "build up" approach. This would remove the need for embankment slopes.

The Havant Thicket Site Alternatives Assessment (April 2020) submitted with the applications (Appendix A4 of the Environmental Statement) summarises the site selection work that had been undertaken previously. Seventy-two potential sites were assessed across the Portsmouth Water and south Hampshire area in stage one study. Sixty-seven of the 72 sites were rejected at this stage, primarily because the proposed source of abstraction was protected under an Abstraction Licensing Strategy and/or the Habitats Directive. Only sites that could be supplied by the Havant and Bedhampton Springs were considered feasible. Five sites were taken forward to stage two and Havant Thicket was assessed as providing the best option as it has the largest capacity, allows for the development of areas for recreational activity that will benefit the local community, together with the potential opportunities for biodiversity enhancement, requires the shortest pipeline and would result in the least impact on the protected Chichester and Langstone Harbour. Eight conceptual reservoir designs on the Havant Thicket site were developed, assessed and discussed with stakeholders. This led to the development of two further refined options which contained a combination of the best features of the favoured appraised options. These were subject to public consultation in 2008 and refined further to form the 2009 Outline Masterplan. The Scheme, the subject of the current planning applications, is a refinement of the 2009 scheme, further reducing impacts on ancient woodland and the Registered Park and Garden, increasing the area of retained wetland, minimising potential traffic impacts, enhancing landscaping and optimising opportunities for recreation and biodiversity.

Portsmouth Water has continually challenged the design in order to minimise impacts on ancient woodland and has made a considerable effort to redesign the scheme to deliver that. For example, the outer slope of the southern and embankment has been steepened from a 1 in 7 to 1 in 5 slope to minimise the loss of ancient woodland at the Avenue and Round Wood. The proposed visitor's car park has been re-located within the north west corner of the reservoir site avoiding the northern end of Bells Copse (which is also ancient woodland). In addition, we are retaining an area of ancient woodland within the wetland area along the northern shore of the reservoir as 'wet woodland' and have re-routed the pipeline to avoid Great Copse SINC.

We are committed to finding other solutions to further reduce ancient woodland loss and ensuring that significant working buffers are maintained to protect existing woodland habitats. However, it is worth noting that the site is very tightly constrained, particularly along the western boundary, where

a southern access road has been proposed to reduce ancient woodland loss along the proposed route of the northern access road. Portsmouth Water will make every effort to maintain a minimum 15m buffer, but there may be some instances where this is not practicable. In these instances, strict measures will be put in place to ensure that existing areas of ancient woodland are not encroached upon. These will be set out in the CEMP. The detailed design will be the subject of future Reserved Matters applications which Natural England will be consulted on.

Mitigation and compensation strategy

Extensive pre-application engagement has been carried out between Portsmouth Water and Natural England and this has allowed the scope of ecological surveys and the principle and scope of the biodiversity mitigation and compensation strategy to be agreed. In response to direct requests for further information on specific topics, we are developing a series of action plans for the delivery of different elements that will be agreed by section 106. Below, we provide some further information as requested.

1. Havant Thicket – 52 hectares of habitat creation/restoration. Portsmouth Water can confirm that a Memorandum of Understanding has been signed by the three key landowners (Forestry England, Hampshire County Council and Portsmouth Water) and talks are being progressed in preparation of the signing of the tripartite agreement. Agreements are in place for the commencement of management works in Havant Thicket in line with details set out in the Biodiversity Mitigation and Compensation strategy. Costings are currently being worked out, between Portsmouth Water and Forestry England, but given that this asset will be operated by Portsmouth Water for the foreseeable future we question need for a costed management plan.
2. With regard to comments in relation to the creation of 80 hectares of woodland/wood pasture creation, Portsmouth Water is currently exploring several options, which will be judged against certain criteria to ensure that the best outcome for biodiversity is achieved. Once we have worked up the short list, we will review the options with Natural England and the county ecologist for comment/review. We propose the delivery to be secured through a standalone action plan via Section 106 agreement.
3. Southleigh Forest habitat restoration – the long-term management plan for restoration of this woodland is currently being developed and will be secured via an action plan secured by Section 106 agreement.
4. With regard to detailed European and other protected species mitigation strategies, drafts for bats and hazel dormouse are included in the method statements for the required European Protected Species Mitigation licences, which have been submitted to Natural England species licencing for pre-screening advice. Method statements for the removal of grassland and the translocation of reptiles are currently being developed and will be secured by condition.
5. With regard to the loss of 3.7km of ephemeral streams, a detailed mitigation and compensation strategy is being developed in conjunction with the Environment Agency.
6. With regard to the provision of 20 hectares of neutral grassland – in order to accurately account for the different habitat types being created for inclusion in the Biodiversity Net Gain metric, the 80 hectares of wood pasture creation has been counted 60 hectares woodland and 20 hectares grassland. This habitat will be managed as part of the wood pasture agreement with the delivery partner for that element.
7. Portsmouth Water is committed to the salvage of deadwood and woodland soils as detailed in the Biodiversity Mitigation and compensation strategy. We are currently discussing options and proposed locations of any materials salvaged from the main site.
8. With regard to the Capital Grants Scheme, Portsmouth Water is currently working on the criteria, but it will be designed to prioritise species and habitats that has been lost or displaced by the project. The proposal is to commence the scheme in 2029, or upon commencement of the operation of the reservoir, with a sum of £40,000 provided per annum for local conservation projects over an appropriate period.

The mitigation and compensation measures will be delivered over a long period of time and in some instances on land outside of PW control, we will therefore be working with willing partners to deliver our aspirations. Mitigation and compensation measures will be designed in consultation with the Hampshire County Council ecologist to ensure that our commitments are clearly set out in the s106 legal agreement, will be enforceable and will be subject to a monitoring strategy in order that the

predicted benefits of the mitigation measures can be measured and, where necessary, further actions implemented.

Impacts from the Pipeline

Natural England has noted that further detailed design will be undertaken in relation to the pipeline route, and that a number of Sites of Importance for Nature Conservation (SINCs), will potentially be impacted. Given that there is a risk that even with mitigation and restoration works, potential impacts to the habitats within the SINCs may not be fully addressed following construction, further details on the mitigation and compensation measures have been requested.

The biodiversity mitigation and compensation strategy has been designed to focus on impacts associated with the reservoir itself, since this is where the majority of the impacts occur. The pipeline route, where the majority of the impacts are temporary, will be covered by a separate Ecological Mitigation Management Plan, which will equate to the Biodiversity Mitigation and Enhancement Plan that is mentioned in Natural England's response. This document will include measures for the protection and enhancement of sensitive habitats associated with Thicket Lawn and High Lawn SINCs. With regard to Great Copse SINC the pipeline route has been designed to avoid this woodland.

Further information is provided in the Records of environmental actions and commitments (REAC), which is located in Environmental Statement Volume 4 – Appendices: Appendix A2 Description of the Development A2.1 Outline Environmental Management Plan (OEMP). Within this document there are two tables that treat the reservoir site and pipeline separately.

Habitats Regulations Assessment and Bechstein's bats

Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, Natural England advises that they concur with the assessment conclusions, providing that certain mitigation measures are appropriately secured in any planning permission given.

Measures to address water quality degradation through the mobilisation of sediment and pollution during construction will be secured through the Construction Environmental Management Plan.

With regard to the delivery of a strategic mitigation approach to Bechstein's bat, Portsmouth Water would welcome the opportunity to work with other stakeholders to develop such a strategy. Reference has been made to a similar approach in Trowbridge by Wiltshire Council to inform strategic planning growth; Portsmouth Water has already made contact with the authors of that document, and an early draft of a local version of that document has been prepared in partnership with key stakeholders. Portsmouth Water is happy to continue providing assistance in developing a bat protocol. However, our understanding is that this involvement is entirely voluntary and is not being undertaken as part of the mitigation necessary for this project.

As a result of detailed bat radio-tracking work there is a good understanding of how the local Bechstein's bat population moves around the local landscape. Through this work important flyways have been identified and highlighted, and some early discussions have been held with local landowners. Portsmouth Water is committed to monitoring and protecting this important population, but it will be the responsibility of the Local Planning Authority and regulator to protect them, through strategic planning and enforcement.

Biodiversity net gain

With regard to the request for the Biodiversity Net Gain tables to be issued to Natural England, Portsmouth Water has submitted the working tables and is currently revising them to address some comments made by Natural England. The updated tables will again be provided separately to Natural England as requested.

Yours sincerely,



Joanne Farrar
 Director, Atkins