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Area Director

Craig Harrison

18th December 2020

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

Dear Sirs

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

The Forestry Commission is pleased to offer the following advice as to the likely impact of the proposals on woodland, in particular ancient woodland, as the Government's specialists in woodlands. Our role is distinct from any which may be 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.*

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 absolutely essential to the reservoir itself i.e. the direct footprint of the reservoir and dam. Loss due to associated activities would not meet the 'wholly exceptional' description quoted in the NPPF.

In this context we draw your attention to the proposals for a **northern access road**. These proposals would cut through an area of ancient woodland (as shown on Natural England's provisional Inventory of Ancient Woodland) and be likely to have the following impacts:

1. **Direct loss of ancient woodland:** in particular we draw your attention to the loss of ancient woodland and associated features (including a grove of veteran yew trees) along the proposed route from the ancient park pale (woodbank) to the B2149:



and the loss that would result from widening the existing forest ride/track along the NW boundary of Havant Thicket:

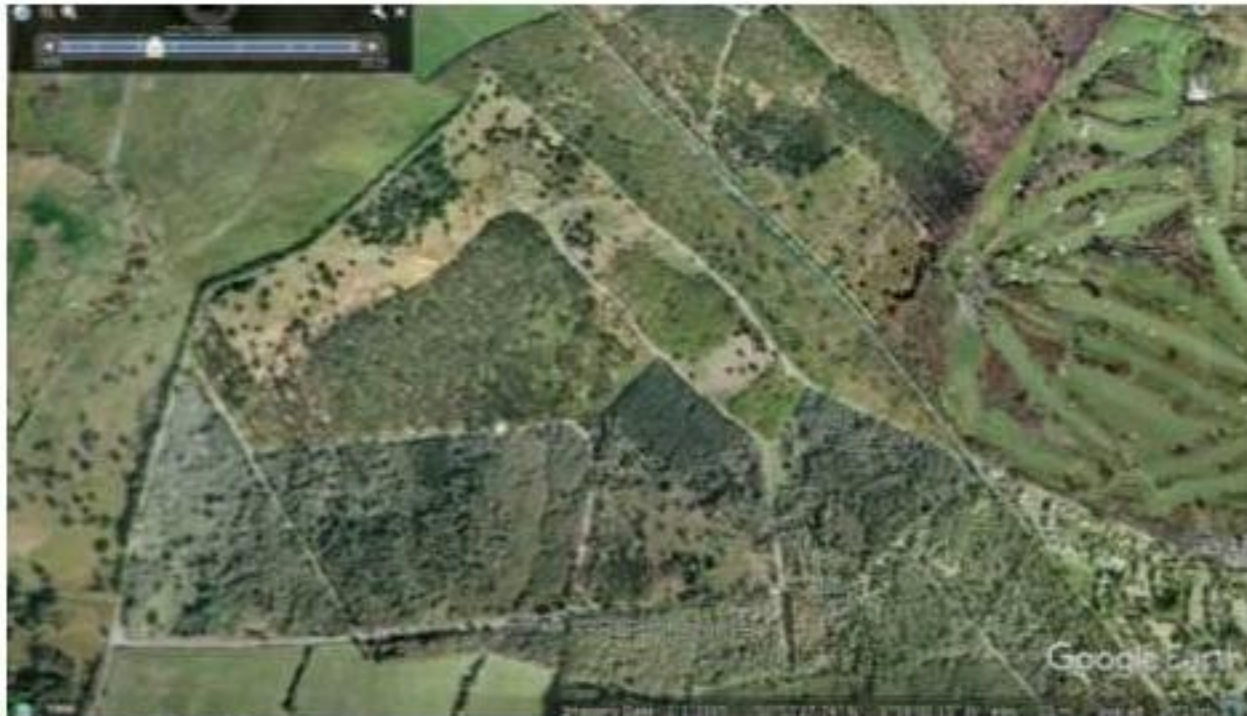


2. Significant **fragmentation** of this ancient woodland; and its interaction with adjacent priority open habitats to the north.

References to the ecological character of Havant Thicket:

Natural England's Provisional Inventory of Ancient Woodland shows much of Havant Thicket, including Horsefoot Hill, as Plantation on Ancient Woodland Site and Section 1.2 of the *OUTLINE BIODIVERSITY MITIGATION AND COMPENSATION STRATEGY* states: '*Forestry England (FE) own Havant Thicket, located to the north of the reservoir, this area consists of approximately 99 hectares of predominately pine woodland.*'

We would point out that the majority of the conifers in Havant Thicket were felled almost two decades ago and the woodland has been actively managed to encourage the regeneration of native broadleaved trees as part of its long term transition back to ancient woodland – as illustrated in the 2005 and 2015 aerial photo's available from Google Earth Pro and the oblique Google Earth aerial copied on the next page. As such we would point out that the majority of this woodland has been successfully restored to 'ancient and semi-natural woodland'.



Google Earth Pro
Historic Aerial
Photograph circa 2005



Google Earth Pro
Historic Aerial
Photograph circa 2015



Google earth
Oblique aerial
from the north

Compensation and mitigation proposals:

As noted earlier the **National Planning Policy Framework** affirms that ancient woodland is irreplaceable and development resulting in the loss or deterioration should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.

We advise that such a compensation strategy for loss of woodland beneath the reservoir should include SIGNIFICANT new woodland which is located and designed to optimize the ecological and wider ecosystem services it provides. We suggest that such new woodland should be sited to link and buffer existing ancient woodland in the local area. Ideally this new woodland should provide ecological corridors for key species impacted by the development while also helping enhance the wider social benefits of green infrastructure (such as access routes for local people).

The *OUTLINE BIODIVERSITY MITIGATION AND COMPENSATION STRATEGY* provided with the planning application, in relation to compensation for ancient woodland loss, focuses on: enhancement of existing woodland, creation of new wood pasture and small areas of woodland creation.

In respect of the proposed package of compensation and mitigation we advise that:

- The creation of wood pasture and small areas of new woodland are included in the proposed compensation package. However, in our opinion this package is 'less than significant' in respect of compensation for loss of ancient and semi-natural woodland.
- The project will understandably generate greater public access to the site and adjacent woodland. This access brings considerable public benefits but inevitably increased pressure on these sites which requires mitigation.
- A major proportion of the proposed compensation/mitigation package relates to the management of existing woodland, for instance the proposals referred to as the 'Birch Dominated Compensation Areas' in para 3.2.2. We advise that compensation should comprise replacement of the specific habitats lost rather than management of existing habitats. Mitigation for the impacts of a development should be additional to management which would be expected as the best practice.
- The compensation/mitigation package also includes creation of open space within existing ancient woodland. While open space is an integral part of most well managed woodland the creation of new permanent open space in ancient and semi-natural woodland would change the soil structure which is so key to these irreplaceable habitats. Management of rotational open space or rideside scrub/coppice is more in keeping with an ancient woodland.
- In respect of compensation for the loss of veteran trees we suggest that a program to identify all the veterans, and trees with veteran characteristics, in the local area and establish a management and succession strategy for them would be valuable.

I trust this advice proves helpful

Yours faithfully



Matthew Woodcock
Partnership & Expertise Manager South East