

Our ref: JLH0448

20 Farringdon Street
London, EC4A 4AB
T +44 20 3691 0500

Date: 12 February 2021

Mr L Oliver
Planning Services
Havant Borough Council
Public Service Plaza
Civic Centre Road
Havant
Hampshire
PO9 2AZ

Dear Mr Oliver,

**HAVANT THICKET, RESERVOIR PROPOSALS (APPLICATION REF: 20/00990)
REPRESENTATION BY BORROW INVESTMENTS LIMITED**

I am instructed by Borrow Investments Limited to make a representation to you in response to the application by Portsmouth Water for the reservoir proposals at Havant Thicket. Can you please note that this representation has been submitted to both Havant BC and East Hants DC, the two local planning authorities in this case.

Borrow Investments Limited (Borrow) own land immediately to the north of the application site, known as Land East of Horndean (LEOH). The northern part of LEOH is the subject of an outline planning permission for a large mixed use development granted by East Hampshire District Council in February 2016 and a more recent 'resolution to grant permission' in June 2020. The southern part of LEOH adjoins the reservoir application site.

As adjoining landowner, Borrow has had a number of discussions with Portsmouth Water in relation to the reservoir proposals. To some extent these discussions have been positive, but there are a number of significant matters, which remain outstanding, as reflected by this representation. Accordingly, Borrow continue to have a number of concerns, which are set out below:

1. The proposed northern access will lead to the loss of irreplaceable ancient woodland. Any compensation mitigation will not outweigh the significant harm. In this connection, Borrow notes the strong concerns to the proposals on this point from representations / objections from Natural England, Forestry Commission, Woodland Trust and CPRE Hampshire. Particularly relevant is Natural England's comment (see letter dated 19 December 2020, page 4, paragraph 4) that the local planning authority need to be satisfied 'that there are no alternative access road design options that would result in less damage to and loss of ancient woodland.' I return to this point below.
2. The proposed northern access route runs through land that is the subject of a restrictive covenant, which raises doubts as to whether the construction of the proposed access road is deliverable. You should be aware that Portsmouth Water recognise the constraint and as far as we are aware, it has yet to be addressed.
3. Leaving aside the covenant point, a small parcel of land will need to be acquired from Borrow so as to provide sufficient visibility splays for the proposed access.

4. The predicted traffic generation through the proposed northern access road raises issues, with regard to both road safety but also the impact upon the environment. For example, the Environmental Statement (ES), submitted in support of the application, states that during the peak construction period there would be potential for 200 HGVs a day. The ES states that the construction period will last for ten years, although we are aware that Portsmouth Water have subsequently explained that the period could be less.
5. The suitability of alternative access roads is addressed by the applicant within the ES Volume 4 (Appendix A13/A13.1/ Appendix C). This part of the ES explores eleven options in total for both the southern and northern access routes. Relevant to this representation are the following options :

Option 2 – northern access, as proposed by application, through Forestry land

Option 2A – through land owned by Borrow, within southern section of LEOH

Portsmouth Water claim that the ES exercise provides the justification for the proposed northern access route. In terms of the numbers, this would appear to be the case. However, the scoring and weighting appears to be misleading. First, with regard to Option 2 (i.e. the application proposal), the environmental effects of the loss of ancient woodland is not reflected by the scoring, neither is the constraint resulting from the covenant, nor the requirement to acquire land for the junction sight line splays. If these factors are taken into account, the scoring would need to be altered, certainly with regard to Tables 3.3 and 3.7. Accordingly, Borrow question whether the ES assessment is a fair and reasonable means for judging the respective merits of the access routes.
6. Option 2A is potentially available. Indeed, discussions are ongoing between Portsmouth Water and Borrow on Option 2A, which is approximately 100m north of the proposed access. The significant benefit is that Option 2A will not result in the loss of ancient woodland. Indeed, paragraph 3.1.8 of the ES Volume 4 access options appraisal confirms that Option 2A 'was developed as an alternative to Access 2 to reduce the potential impact on the existing woodland at Havant Thicket adjacent to the B2149.' This fact is particularly relevant in light of the comments made by Natural England (see point 2 above). For the avoidance of doubt, Option 2A could be made available, so as to accommodate the northern access route for the reservoir.
7. It should be noted that Option 2A is suitable in highways and transport terms. Indeed, in March 2019, this fact was accepted by Portsmouth Water's own transport consultants at that time, The Richard Parker Consultancy (RPC). As set out in their report dated 15 March 2019, RPC recognised that various options were available for providing a suitable access off the B2149 into the proposed Havant Thicket reservoir site. RPC concluded that the preferred option was a ghost island priority junction some 100m north of the northern boundary of the Havant Thicket wood. This option is Option 2A.

In summary, Borrow continue to discuss relevant matters with Portsmouth Water. The significant point being the availability of an alternative northern access route, which is suitable in transportation terms and which avoids the loss of ancient woodland.

I can confirm that I am happy to discuss this representation further with you.

Yours sincerely,
for RPS Consulting Services Ltd



Danny Simmonds
Planning Director
simmondsd@rpsgroup.com