

From: Norton, Tristan

Sent: 21 August 2026 12:54

To: Narinder Lakhan

Cc: Norton, Tristan Weaver, Louise

Subject: APP/26/00575 Pipeline from the reservoir to the north of Middle Park Way to Bedhampton Pumping Station, Meyrick Road, Havant.

Dear Narinder,

APP/26/00575 | Details to discharge Condition 21 Biodiversity Net Gain (BNG) and Condition 23 Habitat Management and Monitoring Plan (HMMP) in respect of the Havant Thicket Pipeline consent planning reference APP/24/00405 dated 22nd September 2025. | Pipeline from the reservoir to the north of Middle Park Way to Bedhampton Pumping Station, Meyrick Road, Havant.

Thank you for consulting me on this application.

I have reviewed the following documents: Biodiversity Gain Plan (Portsmouth Water, 4 August 2026); Habitat Management & Monitoring Plans for The Pig Shed Trust (February 2026), Wild Burnt Wood (November 2024), and South of Yarm Lane (May 2025); Environmental Statement Volume 4 Appendices 9 Biodiversity and 9.21 BNG (Portsmouth Water/Atkins Realis, July 2026); and Proof of Allocation documents for The Pig Shed Trust, Wild Stubbington, Wild Marbury, Wild Felmersham, Wild Denchworth, Wild Tees, and Wild Cobham (dated July 2026). These documents are submitted in accordance with the deemed BNG condition, plus conditions 21 and 23 of APP/24/00405.

The applicant has provided amended details for meeting the mandatory requirement for Biodiversity Net Gain. Previous BNG submissions – which evolved following extensive consultation between Havant Borough Council and the applicant and technical specialists – were to provide significant enhancements to the lower Hermitage Stream at Bedhampton, alongside modest terrestrial enhancements on the applicant's land at Bedhampton and Bidbury and BNG habitats elsewhere within the pipeline scheme red line. These BNG elements were agreed by all parties, were permitted, a Biodiversity Gain Plan and Habitat Management & Monitoring Plan submitted, and a Section 106 legal agreement was signed. None of the BNG elements at Bedhampton and Bidbury are now deliverable. It is highly regrettable that a local solution for the watercourse enhancements could not have been expediated, particularly as the Council expressed its commitment to ensuring that any planning-related administration would have been addressed as an urgent priority, allowing the applicant to progress matters quickly as requested. The Council's approach was detailed in a letter to the applicant dated 17

July 2026. The Council was fully supportive of improvements to the lower Hermitage Stream and stated that it wished to see the applicant deliver the expected enhancements.

The BNG process allows for the provision of BNG unit enhancements at any location within England, provided that the required units are purchased from a registered BNG provider (a habitat bank). Prior to this, it is the responsibility of the applicant to ensure that the BNG Hierarchy is followed. This stipulates that the purchase of off-site units or statutory BNG credits should be chosen only after all on-site options have been explored and dismissed. In this case, the exploration of on-site and locally-based BNG elements has been carried out (and previously agreed) but are now found to be undeliverable. I cannot in all reasonableness state that the BNG Hierarchy has not been followed: the applicant and the Local Planning Authority have expended much effort in trying to find a local enhancement solution. It is a fact there are no habitat banks – for terrestrial or watercourse BNG units – in Havant Borough. Given the timeframes for this and the wider project, the applicant has needed to secure BNG units at speed.

The amended BNG proposal entails the purchase of terrestrial and BNG units at various locations in England: Hampshire, West Sussex, Surrey, Oxfordshire, Bedfordshire, Cheshire, and North Yorkshire. Evidence that the required BNG units have been allocated at each of these locations has been provided. I can confirm that the proposed off-site BNG purchases are procedurally sound.

In summary, the submitted information is acceptable.

If you have any queries, please don't hesitate to contact me.

Kind regards,

Tristan

Tristan Norton