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Date 4 October 2024

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Your reference APP/24/00405
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Dear Sirs,

**Pipeline from the reservoir to the north of Middle Park Way to Bedhampton
Pumping
Station, Meyrick Road, Havant**

Hybrid application seeking: 1) Full permission for development of new pipelines to transfer water from Bedhampton Springs to fill the reservoir in the winter and draw it off to treat and supply when needed in the summer, comprising: construction of two predominantly underground pipes in tunnels linking the reservoir with the existing pumping station at Bedhampton with associated infrastructure including: emergency drawdown discharge structure at Hermitage Stream; construction of eight access shafts; upgrades to existing culverts close to shafts five, six and eight to manage flood risk; washout and air valve chambers (typically below ground), new plant at Bedhampton Pumping Station, modifications to Bedhampton 2 operational building and permanent diversion of Footpath 34 at Bedhampton Pumping Station.

2) Outline application for an associated underground cross-connection chamber and above ground kiosk at the reservoir site with vehicular accesses for maintenance.

An Environmental Statement has been submitted with the application under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Thank you for consulting the Highway Authority on the above planning application for a revised pipeline. Consent was previously granted under application for outline consent reference APP/20/00991 for the original pipeline scheme. This was supported by a request for a number of conditions and obligations including the requirements for further detail of the specific scheme. The pipeline application is made to support the consented Reservoir scheme under reference APP/20/00990.

The development has amended the pipeline proposals to alter the route and construction method of the pipeline. The make up of the submission is focused on the EIA assessment needs and generally is lacking in the technical detail required for the level of consent sort. The Highway Authority feel that alongside the Planning Authority the nature of any consent needs to be clear. In particular that planning consent would not negate the need for a significant number of licences, design approvals and legal agreements with the Highway Authority before the scheme could be constructed. The design approvals remain the Highway Authority's greatest concern in relation to a full consent, as the approval mechanism for such technical details has not been run in parallel to this application, therefore at present there is insufficient information or certainty for the Highway Authority that the scheme could be constructed in the manner presented and therefore that the conclusions of any EIA are sound.

Revised Scheme

It is understood that the proposed changes to the route and construction methods see the pipeline laid via micro-tunnelling for the majority of its length. The pipeline would be built section by section with 8 access shafts required. There remain two sections of the pipeline which would be constructed via the open cut method. Three culverts require amendment, and a new utilities kiosk to control the system. There is also an additional vehicle access requirements to an above ground kiosk off Corhampton Crescent. It is understood that the Shaft 1 construction considerations do not form part of this application as these are consented through a separate RM application. However additional works are required at the Meyrick Road site which do make up part of this application.

The pipeline route is 5.3km long at 2.5m wide and laid at a depth of 3-10m underground. It is stated that these depths are well below highway and outside roads, footpaths, utilities, watercourses and tree roots. This will need to be considered on a case-by-case basis. as the depth of the highway can vary depending on the necessary infrastructure to undertake the highway function and therefore it cannot be assumed that infrastructure falls outside land classified as highway.

A permanent diversion of footpath 34 is also required as a result of the proposed works at the Bedhampton Pumping Station (Meyrick Road site).

Pipeline Route

Pipeline drawings have been supplied within the submission which set out the route and depth of the pipeline. The Highway Authority require additional geotechnic information as requested at pre-application stage before the pipeline details could be agreed to the level of detail submitted within this application. Direct engagement is sought with the Highway Authority on this point to agree the necessary details for submission and agreement at this stage.

The highway boundary details should be shown on these drawings, so it is clear where works fall within the requirement for highway approval. Whilst the works areas required for the shaft and culvert works are shown on separate drawings and narrated within the submission there is no discussion on the implications of any road crossings. Whilst it is noted that these are tunnelled, during works there may still be requirements for active traffic management measures to ensure road safety, depending on the geotechnical risks of the various crossing locations and the depths.

No information has been provided on existing statutory undertaker provision which are likely to exist in the bounds of the highway and therefore the certainty over the deliverability of the scheme in relation to the detail submitted, for example the achievable depths. Changes to the construction depths of the need to divert existing services could lead to significant programme changes.

Public Right of Way Diversions

The revised scheme requires a permanent diversion of Footpath 34 at Bedhampton Pumping Station. This includes a new footbridge over Lower Mill Pond and is proposed to provide a more attractive route to walkers than the existing path. The Highway Authority welcome amendments to the route, however, require the route to cater for cyclists to link Mill Lane with Havant Town Centre. The Kingscroft Application is seeking to cater for a 3m wide cycle route along the existing alignment of Footpath 34 and the dedication of additional rights to allow for cycling. The same should be replicated through this planning application to allow the site to not prevent an identified multimodal cycle link connecting Bidbury to Havant Town Centre on a traffic free route. The Highway Authority note this request has also been made within the Countryside Services response from Hampshire County Council and we welcome joint engagement on the matter to ensure an appropriate design and an upgrade of the public rights is presented and secured through any planning consent.

Arboriculture Impact Assessment

Confirmation is sought on whether any highway trees are impacted by the proposed design, these should be clearly identified to the Highway Authority for consideration and CAVAT assessments should be carried out regarding their loss in accordance with TG15.

The Highway Authority's Arboriculture team have requested the following information:

- Arb Impact Assessment
- Tree Protection

- Tree mitigation/replanting
- Arboricultural Method and Specification Note which are referred to on the landscape drawings.

Culvert Amendments

It is understood that there are a number of culvert amendments required which were not brought to the Highway Authority's attention under the original consent. The documents that have been noted are those relating to the General Arrangement and Compound Layout for Dunsbury Way, Middle Park Way and Purbrook Way.

It remains unclear to the Highway Authority the grounds for these amendments and the process for consent of the requirement. The Highway Authority seek further clarity on the need to amend highway assets.

From the details provided a number of initial issues are noted by our structural engineering team and these are set out below:

- The maintenance responsibility for the pipe and headwalls is unclear and should be clarified
- All amendments will be subject to CG300 Technical approval which will require the entering of the S278 design check process and subsequent legal agreement.
- At Purbrook Way the culvert is shown at 900mm and these are below the required current design specification. The pipes are 25.2m long and under CD529 Cl3.4 it states that the minimum pipe diameter is 1.2m to facilitate access for maintenance. If the culverts are to be amended, they must accord with the design standards.
- Confirmation that as per CD529 that Chapter 4 of CIRIA C786 has been used to design screens and whether the EA have confirmed the proposed provision within the designs.
- Plans need to be provided showing the extent of the public highway on all proposals.

The reinstatement requirements and compound areas are shown on a separate package of drawings submitted. The culvert works are not referred to within the Transport Assessment Addendum neither are the reinstatement drawings provided within that documentation; it is therefore unclear if they have been accounted for within the assessment.

Dunsbury Way

This site abuts the consented Dairy Crest scheme and there are concerns around the levels of the embankment between the site and the public right of way. Clarification is sought on any amendments to this bank which may impact that consent.

Dunsbury Way would be closed to through traffic and a diversion route for both vehicles and pedestrians would be required. Dunsbury Way is a bus route and therefore any proposals for a closure would adversely affect the bus route and access to public

transport for users. The applicant should provide full details of the proposed diversion route and the requirements for the closure. The timings for this closure and that for Riders Lane, which may offer a suitable alternative route, would need to be co-ordinated to accommodate bus provision.

The proposed works will require alterations to the existing kerbing and edgings. The reinstatement proposals do not currently include any kerbing reinstatement works. Given it is proposed, although not agreed, that Dunsbury Way carriageway will be used as a compound, this area should be included within the reinstatement plans. The works should be subjected to a pre and post construction highway condition survey.

Areas of verge within the adoptable highway would need to be in accordance with HCC TG15. Ideally the highway areas should be hatched separately to show different requirements to the private areas.

Middle Park Way

Additional compound access is required for culvert amendments at High Lawn Way, south of the junction with Middle Park Way. This will require significant hedge removal to accommodate the access and visibility splay requirements. Due to the constrained nature of the mini roundabout at High Lawn Way/Middle Park Way junction the tracking movements require the mini roundabout to be overrun. Tracking has also been provided for only two movements. The left turn into the High Lawn Way is not a movement currently permitted for the outline consent. Vehicles accessing this site should be coming from the Swanmore Road access and therefore the correct tracking movements need to be provided.

Purbrook Way

This culvert amend is located in the same site as Shaft 5 and comments relating to this works are provided under the Shaft 5 area of this response.

Environmental Impact Assessment – Chapter 13 Transport

A tracked change version of Chapter 13 has been submitted which shows where text has been added. The applicant should confirm that no previous text has been deleted.

As this is a detailed application with all matters considered, the details of the compounds, including transport assessments of the impacts is required in order to demonstrate the level of impact construction related traffic will have on the local highway network. This should include a full study area of the current proposals. A CTMP should be provided assessing the impacts on all roads required to access each compound. Meyrick Road has not been included at present in the considerations and it is noted that Hooks Farm Way has been added to the link assessment with high sensitivity but not included on the network diagram.

A TA Addendum has been set out in Appendix A13.2 of the ES. The baseline data has not been amended as it is assumed that the base situation has not significantly changed since the outline consent. Data was collected in March 2020 and therefore should be updated appropriately, especially given the presence of the Covid 19 Pandemic at the time of the data collection. The Highway Authority is open to considering sensitivity testing of data collection to ensure that the 2020 data remains

robust. Some of the roads that have been added to the network are absent traffic count data and a proxy has been utilised. Details of this approach should be provided. A factor has also been used to generate daily traffic volumes where peak hour data is only available. But the details of this have not been set out and should be provided.

The 2020 EIA assessment forecast HGV movements totalling 100 arrivals and 100 departures across a day for the reservoir. This is noted within the revisions as likely to be less due to design changes of the reservoir embankment but these have not been quantified within this chapter. The number of HGV movements to the Northern Access was restricted through the CTMP secured within the consent under condition 12 to limit the number of HGV movements as set out within the document. For the pipeline, numbers were restricted to the assumed 15 arrivals and 15 departures and secured within the consent. As a result of the amended construction method additional movements outside of this restriction are required, these have been set out in this chapter based on the impact on each link, however this has not been based on a comparison to the previously agreed position or on the basis of the total number of HGV's per a day from the reservoir site. Amendments to the ES should clearly show the previously agreed position, especially where the impacts are amended in table 13-7.

Reference is made to the reduction of staff trips however these have differing impacts to that of HGV's and therefore the benefit is not equal.

The ES should set out clearly where the impact has changed from the previous considerations. Consideration on HGV impact has been undertaken on link L45 (Swanmore Road) and L54 (Hooks Farm Way). It is unclear why only these two roads have been identified. The IEMA Guidance requires consideration of all roads where the HGV percentage increases by 30%.

The Highway Authority require greater clarity on the vehicle numbers and whether the applicant requires changes to the operational restrictions set out within the existing consent, limiting HGV movements and total traffic movements to and from the Reservoir site secured under condition 12.

The Non-Technical Summary of the ES states that the revisions make the length of the pipeline route shorter and minimise disruption to local residents during construction, however it is unclear from the evidence how this is the case.

The Non-Technical Summary also sets out that the main welfare facilities will be situated within the Bedhampton Pumping Station however this is contrary to the ES Chapter 13 assumptions and against the consented CTMP for the Reservoir and Pipeline consented applications. It also differs to what is set out within the submitted CTMP's to support this application and the approved Travel Plan. Access to the Bedhampton Pumping Station site is constrained and requires routing of additional traffic through Havant Town Centre. It is unclear why a change is proposed, the

benefits of any change or the traffic impacts of the change. Further clarity is sought on these points.

Road Closures

A number of road closures have been identified within the ES chapter, this includes:

- Middle Park Way
- High Lawn Way
- Riders Lane
- Purbrook Way
- Dunsbury Way

Road closures on Middle Park Way, Purbrook Way and Dunsbury Way are proposed for 2 weeks. Insufficient information is available in terms of the need and construction method to establish whether these are wholly necessary. Where possible through the requirements under NRSWA the need for road closures should be minimised. Clarity is sought on the work activities to be undertaken the necessitate a need for a road closure of these routes.

Alongside this a number of much longer (circa 20 months) lane closures are required. Again, it is unclear why lane closures to facilitate works off the highway are necessary, and clarity is sought on the need for such impacts to arise from the scheme.

It is noted that the closures associated with this proposed development significantly differ from those set out in the 2020 ES. Whilst it's welcomed that a closure of Fraser Road is no longer required at the outline stage it was determined that these were the worst-case impacts and the details of any closure requirements and mitigation would be dealt with through the usual permitting process for utility works. Given that this is a full application, the parameters for consideration must look in detail at the proposed closure requirements, which appear generally to be for longer periods and include extensive parking displacement.

Parking Suspension

Parking suspensions have been considered as necessary on the following roads:

- Middle Park Way
- High Lawn Way
- Hooks Farm Way
- Stockheath Lane
- Meyrick Road

The Highway Authority welcome the parking assessment but require more information around the numbers presented. For example, how have sites in close proximity to schools been assessed to ensure the school drop off and pick up arrangements remain safe and appropriate. Clarity is also sought how the surveys were undertaken, and

where spaces have been assumed to be. Distances to alternative parking for those displaced should also be set out. It is noted that surveys were not undertaken in accordance with the Lambeth method, nor did they observe parking requirements at school finishing times. The data provided is therefore not agreed.

Road closures and parking suspension requirements are matters which would generally be dealt with through agreement of the CTMP and Permit requirements. Any planning consent does not override the statutory legislation around road works and the use of road space and therefore for the benefit of the ES work the applicant should confirm that these are worst case assessment assumptions in terms of the EIA impacts, acknowledging that some of these closures and parking suspensions will not be acceptable to the Highway Authority.

Environmental Impact Assessment - Transport Assessment

Appendix 13.1 Transport Assessment is a document dated 03 September 2020 and has not been revised against the amended construction proposals. The TA Addendum 13.2 Part 1 sets out to address the requirements for updates in relation to the previous TA work.

Trip Generation

Revised trip generation figures have been set out within the TA Addendum. The average trips fall in line with the original assessment which considered a maximum of 30 two way trips a day. However, it is not clear how the average figure has been calculated and this could be providing a significant downplay of the true HGV numbers. The applicant should set out how the HGV trip generation has been calculated and why the construction programme can't accommodate the agreed and assessed impacts within the outline consent.

Traffic Impact

The TA Addendum goes on to assess the percentage increase across a day however given that the derived numbers are not agreed the percentage change and conclusions can't be agreed.

The HGV impacts have also been calculated and where no HGVs on the existing network have been recorded the TA Addendum states that the percentage change can't be recorded. However, this is not true, the percentage change would just be very large.

These should be set out and reflected appropriately as the Highway Authority remain concerned around the HGV impact within the residential streets and this needs to be duly considered within the ES.

The TA states that there are no prescribed numbers of HGV's which would be considered significant set out within the IEMA Guidance, but this is not true. The guidance state an increase of more than 30% or the doubling of HGV numbers are material considerations for harm. It is suggested that any mitigation can be agreed

within the CTMP. At this time in the absence of an approved CTMP this position cannot be agreed.

Vehicle Routing

Vehicle routing arrangements are unclear for each construction compound. The narrative should be provided for each compound specifically. It is also unclear whether deliveries will all remain directly to the Reservoir site and then transported to each compound and how therefore the impact in particular on the residential areas of Havant are being minimised. Reference is made to the requirement to utilise tractors and trailers to move materials from the reservoir site to the pipeline construction compounds. As these vehicles are not permitted on motorways, they are required to travel south on the B2149 through Rowlands Castle and Havant. Movements south on the B2149 were specifically prevented within the outline consent and it is unclear why this change is required. The TA Addendum states that this would be an interim measure until the Southern Access is constructed however these access works are required prior to the commencement of the pipeline scheme and it is not agreed appropriate to amend this provision. The Shaft 1 RM consent no longer relies on tractor and trailer movements. Notwithstanding the noncompliance with the consented vehicle routing, the use of tractors and trailers in an urban area raise concerns in relation to the suitability of the road network to accommodate such a vehicle. The vehicle size should be confirmed and tracking drawings should be provided for all routes. Consideration will also need to be given to street furniture and whether physical changes to the highway would be required to accommodate this vehicle type, which has a more onerous tracking movement than a HGV.

Vehicle Access

A number of vehicle access points will be required to provide access to the compound areas along the route. Details are provided in a number of drawings presented within the TA Addendum. The drawings have previously been reviewed as part of the pre-application process and whilst there have been minor revision changes the points raised within the pre-application response still stand and therefore the applicant is referred to the pre-application which has been shared separately for the benefit of the Planning Authority.

In addition to the site-specific comments in the pre-application advice, the highway authority would also recommend that further information is provided as follows on the site access proposals:

- Use of topographical rather than ordnance survey maps to ensure proposals are deliverable as shown;
- Plans shown at suitable scales to be able to provide sufficient context and detail to comment on
- Clarity over which access points will remain permanent for ongoing maintenance requirements

- Visibility splays should be clearly annotated on each drawing based on recorded speeds
- Clarity over reinstatement of kerbing and areas of verge within the adoptable highway as per the highway authority's Technical Guidance Note 15

The works require a number of closures and diversions during construction and consideration of the impacts have not been clearly articulated within the TA work other than with reference back to the EIA criteria. The highway authority need to be satisfied that changes to the network will not result in unacceptable impacts to the safe operation of the highway for all users, and any impacts can be mitigated to make them acceptable.

Site Access Standard Detail

The standard detail produced for the compound accesses shows a 20m vehicle crossover arrangement. This would require a S278 agreement to facilitate its delivery on the highway.

The haul road is indicated at a width of 5m which would be insufficient for two-way HGV flow and therefore management measures to prevent vehicles meeting at the access would be necessary to prevent vehicle blocking or waiting on the highway, these should be set out for each compound as required.

Gates are shown on the standard detail and for each location clarity is sought on how these will be managed during the hours of construction.

The haul road within the standard detail is shown as type 1 stone but may be required to be tarmac for the first 20m to prevent mud and spoil onto the highway.

Shaft 1 – Meyrick Road

These works are to be undertaken under the existing permission and therefore comments are provided within that standalone application for Shaft 1. It is noted that the vehicle routing arrangements set out within this application do not represent that within that application and this should be amended.

The access arrangements for the pipeline works themselves associated for this particular application need to consider the arrangement for access should the Kingscroft access arrangements have been delivered. It should be demonstrated that access is achievable with the revised arrangement.

It is noted that the PRoW route through the redline of this area is sought be changed and this includes within the redline the crossing of the hermitage stream. Reinstatement works should enable the future delivery of a cycle route between Bidbury and Havant.

Shaft 2 – Hook's Farm Lane

The tracking for this access has been undertaken on OS mapping but the highway authority has concerns over the width of the carriageway at the access point being appropriately reflected within the base mapping. Suitable topographical mapping should be used to agree the tracking.

The pre-application comments raised concerns around this location and its proximity and interaction with Bidbury school routes. No amendments appear to have been made in respect of those comments. It should also be noted that in order to access this same land area for the Southern Water Stat Con an alternative access arrangement was proposed. This was not supported due to its additional impacts on access to Bidbury schools, however a 3rd option exists on the northwestern corner which should be explored in order to minimise the impacts on the established and well used walking routes. Alignment between the proposals for this compound area for the Southern Water DCO and this proposed consent should be aligned.

An annotation exists on the plans in relation to agreeing the haul road material. The Highway Authority will generally expect the first 20m of any haul road to be tarmac to prevent mud and debris from being taken out onto the highway, however this can be discussed on a case by case basis.

Reinstatement has been shown here but simply to return the whole area to verge which is not acceptable. The reinstatement gives no regard to the presence of the existing footways, posts, low level fencing, concrete access road or parking areas which would be impacted by the access arrangements. Reinstatement should show the area being returned to its current arrangement.

Shaft 3

This site is located on Stockheath Lane in close proximity to Tosnant School. The access is shown only indicatively and should be clearly presented. There is a requirement for parking suspensions which may impact the school and the haul road cuts across the existing path with no indicated diversion route or formal crossing provision. Visibility splays are shown but are not based on recorded speeds and therefore are not in accordance with TG3.

The proximity of the proposed gate positions to the main carriageway, suggest vehicles may need to wait on the main carriageway to gain access. If appropriate these should be relocated further back or suitable measure put in place to ensure carriageways and footways are not blocked by waiting vehicles.

Whilst it appears to be located to the south of the compound, there is an existing tree within the open space/behind the footway which is not shown on the drawings. Given other trees are shown including their RPA's, this tree should also be included.

Shaft 4

Drawing HTR-ATK-HGN-04-DR-D-0001 Rev P4 has been submitted and labelled as shaft 4 but shows the same location as Shaft 3. Clarity is sought on the Shaft 4 access

proposals as it is not clear how this Shaft will be accessed and a drawing with suitable layout including visibility splays is required.

Shaft 5

This compound location is accessed via Purbrook Way and involves the closure of Riders Lane. Comments on the principle of the closure of Riders Lane are set out within our pre-application response, including seeking clarity on the need for such a closure.

The shaft for this location is proposed within the highway boundary. This is not acceptable because if the infrastructure was placed within the highway, it would have a negative impact on future maintenance and improvement of highway infrastructure. The shaft should be located along with any permanent features outside the boundary of the highway.

Materials are proposed to be stored in the highway and this is not agreed. Footway closures are proposed on the northern side of Purbrook Way to facilitate this storage and this is an unacceptable impact to a primary walking route. Riders Lane is proposed to be closed at its southern end and there would be suitable space within this closure for material storage on the highway. It should be noted that this would be subject to appropriate licencing with associated charges. Removal of the need to store materials on Purbrook Way also negates the need for parking suspension and additional footway/crossing provision which would need to be to an appropriate standard. It would also remove the need to relocate the existing bus stop.

The proposed amendments to accommodate diverted pedestrians would not offer appropriate visibility splays due to the proximity of the parking bays to the proposed build outs. Parked cars would be an obstruction to the measured splay, which is not acceptable.

The location of the proposed gates on Riders Lane mean vehicles would have to wait on the Purbrook Way carriageway to gain access which is not acceptable. These should be set back within the compound to avoid the need for vehicles to wait on the operational highway.

The closure of Riders Lane will require a TTRO to be applied for and will be subject to that separate statutory process.

Given Riders Lane carriageway would be used as a compound, this area should be included within the reinstatement plans. At the very least this should state repairs may need to be undertaken and agreed with HCC following inspection post removal of the compound. The works should be subjected to a pre and post construction highway condition survey. The location of the culvert appears to route under (or close to) the existing refuge island. The reinstatement works should include repair/reinstatement of this island in accordance with HCC standard detail HCC11/C/080. For clarity, the

highway areas should be hatched separately to show different requirements to the private areas.

Shaft 7

This is located on High Lawn Way. It is unclear what works are proposed to the green space in order to accommodate the turning movements and these should be set out clearly. The green space makes up part of the public highway and therefore works to this area may require a s278 agreement.

It is proposed to gate the highway which will require a road closure and temporary TRO. No turning provision has been shown to accommodate existing movements and this would need to be provided.

There is a disabled parking bay marked on site which would be impacted by the closure which may not be acceptable.

There is a footpath which leads to Great Copse Drive which would require a closure and is part of the adopted highway network for footway use as well as being part of the PRow network. It is unclear whether safe use of this footpath will remain during the works and if it is to be closed what the appropriate diversion route will be.

The proposed gates and hoarding also appear to block the footway on High Lawn Way itself and provide no alternative provision. The gates should be set back so as not to obstruct the footway and allow vehicles to exit High Lawn Way without being required to wait on the operational highway.

Vehicle tracking is only provided from and to the west of the access with High Lawn Way. Appropriate consideration needs to be given to the vehicle movements including whether the use of Dunsbury Way is the most appropriate vehicle route. Tracking should be shown for all proposed movements. This applies to all access locations.

The works will need to be subject to a pre and post construction highway condition survey. Reference is made to the translocation of an established highway oak tree but this could be avoided with adjustment of the works area.

Shaft 8

This shaft is located north of Middle Park Way and to the east of Bitterne Close. Concerns around the access location were previously raised within the pre-application response. In addition, it is also noted that the access arrangement is likely to impact on highway trees, these impacts should be clearly set out.

Shaft Compound Layout – Emergency Discharge Chamber

The drawing should clearly mark the highway boundary. An annotation suggests the possible temporary relocation of the existing zebra crossing. This is not supported because it is an established crossing on a well used desire line. Street lighting relocation is set out to be agreed through appropriate conditions, but this would be a

s278 matter. The required works should be more clearly shown and if there is a need to relocate the crossing the proposals should be set out.

Tracking is only provided for the temporary compound arrangement and not shown how access is achieved to the permanent access directly onto Corhampton Crescent. There is evidence of on carriageway parking which may prevent access for larger vehicles should they be needed. This access arrangement impacts a signed cycle route which is not acknowledged on the plans with reinstatement and amendments to footway provision only referred to. Consideration needs to be given to appropriate re-provision of the route along with appropriate width to accommodate cycling within any permanent design changes. This should be in accordance with LTN1/20 and Hampshire County Councils TG10. The interaction of pedestrians and cyclists where they meet Corhampton Crescent should also be included given the introduction of access to permanent development. This should include crossing provision suitable for pedestrians and infrastructure to allow cyclists to leave and rejoin the carriageway.

TA Summary

Generally, across the ES Transport Chapter and evidence base, there is insufficient information or consideration of the impacts given the level of detail consent sort. The construction method changes results in a number of significant sized compounds and the presentation of the data replicating the trenched scheme approach is not agreed. Generally, the data supporting the assumptions is spread across the ES work and this makes consenting of agreed parameters difficult. A distinct suit of documents should be set out for each compound works area setting out all matters such as the design, reinstatement, legal requirements, vehicle routing, CTMP management requirements, duration of works, staff numbers, parking requirements, PRow implications, pedestrian and cyclist diversions, road closures etc so that that compound design and transport implications can be appropriately considered for each area. These should all accord back to the general and agreed principles set out within the consented Construction Worker Travel Plan and fCTMP for the outline consent. This document structure would prevent the current discrepancies across the documents. In addition, it would ensure the construction parameters and constraints for each works area can be clearly set out, conditioned and adhered to.

The current traffic impact assessment takes a more strategic view of the road network, and this is failing to identify the more localised impacts on the residential streets that need to be managed to deliver such a project.

Environmental Impact Assessment – Chapter 19 Cumulative and In-combination Effects

A revised assessment of the cumulative and in-combination effects has been submitted to support the application. The Planning Authority should ensure that the short list includes all sites relevant for consideration. It is noted for example that the Former SSE site on Bartons Road is still included in the short list but the site has been refused and is not currently subject to a live planning application.

Works are referenced to not taking place at night and consideration needs to be given to this alongside the detailed requirements of the highway works. The Highway Authority seek clarity from the Planning Authority in any nighttime restrictions are being sought to be placed on any consent.

Full road closures are referenced and concluded that no significant effects would arise. Whilst this might be an appropriate conclusion for the ES work it is not an agreed position with the Highway Authority in transport impact terms. The details of the closure requirements, evidence that they are wholly necessary, diversion routes and implications need to be clearly set out for each works area before these conclusions can be drawn. The same applies for any footway/cycleway closures impacting pedestrians and cyclists. The introduction of additional crossing movements also needs further assessment.

Construction Method Statement

A construction method statement has been submitted which sets out a construction programme of 3 years commencing March 2025. The phasing plan has been referred to setting out works sequencing and the timeline.

At present the programme is considered to be provisional and inclusion within the planning consent would not override the timing requirements for road space and other required consents under the Highway Act and New Roads and Street Works Act for example. Timings of any works on the highway would be subject to the necessary permitting requirements and coordination of works. It is recommended that the applicant engage more directly with the Highway Authority on these details. In terms of sequencing if the applicant is wishing to agree parameters for the purposes of the EIA assessment this should be clearly set out to the Highway Authority with an explanation on how the sequencing seeks to reduce the highway impacts raised as a concern through our pre-application engagement. For other similar projects this is done through a Traffic Management Strategy.

Construction Traffic Management Plan

Copies of the CTMP's for the reservoir site and dual pipeline works have been provided. Having two separate documents is not agreed as the project is being delivered as a combined nature with distinct overlap between the use of the reservoir site for both the reservoir construction and the pipeline works. Layering the CTMPs make management, monitoring and control of the reservoir site and compliance with overarching CTMP difficult. A single CTMP should be presented setting out clearly all works being undertaken and committing to working within the restrictions set out within the outline consent.

Notwithstanding the above the submitted CTMPs have been reviewed.

Reservoir CTMP

A new CTMP has been submitted for the Reservoir works however for the benefit of this application a revised fCTMP from the outline consent should be provided (track changed) for review and securing through agreement. The fCTMP would need to be resecured through any revised consent to ensure overall compliance to a single document for all works. The document submitted is a new document dated 01/03/2024 version 1. Clarity is sought on why a new document is presented and not a revision of the existing approved framework. Given that the proposed submitted document is a live document to be agreed for each phase but a recent application has approved the CTMP for the remaining reservoir phases the submission is even more unclear.

The Highway Authority seek clarity from the applicant on which document they are currently operating under.

Pipeline CTMP

The pre-application response set out some initial comments in relation to the CTMP and these should be considered by the applicant.

The submitted document sets out core commitments which are generally welcomed as an approach. The CTMP should not however rely on the need to refer to other documents in order to validate compliance. The working restrictions should clearly be set out.

Comments on the commitments are set out below:

- The use of an overarching CTMP and addendums is problematic when works overlap. The reservoir and pipeline works should be working to one comprehensive CTMP.
- It is unclear what the top third of the pipeline is in relation to the use of the Swanmore Road access. This should be clarified referring to the relevant compounds which will be accessed from Swanmore Road.
- It is referenced that the vehicle movements of 250 workers did not cause harm requiring mitigation in the original TA work but this is not agreed. The mitigation measures within the CTMP to manage construction workers to arrive and depart outside the peak periods was a direct result of the traffic impacts at the A3(M) Dell Piece Roundabout. Notwithstanding this the commitment to maintain the numbers is noted, although this should be reduced to the 65 set out within the EIA assessment and not the 125 as originally consented.
- The HGV movement restrictions once agreed should be replicated within the CTMP.
- Parking within work areas W1-W8 should be limited to encourage compliance with the approved Travel Plan requirements for the wider development.
- HGV routing past school sites will not be permitted during the normal drop off and pick up times.
- It is noted that a shuttle bus is to be provided for Welfare facilities. The location of these should be confirmed.

The CTMP goes on to set out access arrangements for each shaft. The comments set out in this response should be addressed and reflected in the CTMP as appropriate.

The CTMP should also clearly set out the number of movements to each compound location and the specific vehicle routing in more detail, including impact on sensitive receptors such as schools or shopping areas where higher pedestrian flows are present.

Construction Worker Travel Plan

A construction worker travel plan reference HTR-WAB-PI-ZZ-PL-W-0002 dated 22nd May 2024. The travel plan should not be a separate stand-alone document but be imbedded into the overall application travel plan as approved (reference HTR FUW ZZ ZZ PL W 0549). The Highway Authority welcome submission of an amended travel plan to cover the pipeline elements but this should follow the principles of the approved plan.

Within the submitted Travel Plan reference is made to all site compounds containing welfare facilities including showers, changing area, canteen and site offices. This is not per the agreed construction worker travel plan for the combined consent for the pipeline and reservoir. Here all main welfare facilities such as canteens were to be housed at the main reservoir site. This aids with reducing the size of the compound areas and is still a position supported by the Highway Authority, especially where the compounds require the use of operational highway land.

The travel plan does not commit to all construction workers traveling to the reservoir site and being transported to the individual compounds but works on an assumption that all travel will be straight to the relevant shaft compound areas. This is not agreed because it undermines the outline consent mitigation strategy to reduce the impact of construction on the populated streets within Havant town and the Leigh Park area.

Consents and Licences

The applicant should set out clearly under what powers they intend to undertake the various works within the Highway. Temporary and permanent changes to the highway to provide access, make changes to highway assets such as the culverts or to construct compound areas within highway land will require S278 agreements. Where tunnelling is being undertaken under highway infrastructure then the necessary consents and licences will be required. Where materials are to be stored on the highway licences will also be required. Any road closures or parking suspensions will require separate TTRO applications and approvals. The Permit scheme would also apply.

Recommendation

The Highway Authority require additional information before a recommendation can be made on the application, in particular to clarify the level of detail to be agreed through the planning permission and what matters can be suitably conditioned. In any event the highway authority has noted a number of areas where further information is required to

either confirm that the works would not result in an unacceptable impact on the safe operation of the highway for all users, or that any consequential environmental or amenity impacts have been clearly established for the planning authority's consideration.

I trust that the above is clear. Should you have any queries, please do not hesitate to contact Holly Drury on the number noted above.

Yours Sincerely,

Ben Clifton
Strategic Transport Manager – Highways Development Planning
Hampshire 2050