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ELECTRONIC ONLY

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Our Ref:

JTM/1856/AT/20240617

Your Ref:

APP/20/00990 / 51680/010

Project No:

JTM/1856

Dear Mr Lakhan

Application for the Discharge of Planning Conditions Relating to Temporary on Site Worker Accommodation, Havant Thicket Reservoir, EHDC Ref: 51680/010 & HBC Ref APP/20/00990

Response to Consultation Comments

We write on behalf of Future Water with reference to the above applications to discharge planning conditions in relation to the temporary worker's accommodation for the implementation of Havant Thicket Reservoir.

It is noted that no objections from statutory consultees have been received by either planning authority in relation to the temporary worker's accommodation application, however, it is noted that comments have been made regarding the application by the HCC Landscape Planning Team and HCC Highways.

To address the comments from the HCC Landscape Planning Team, amendments have been made to the construction lighting strategy to include reference to the Soil Management Plan (section 2.2) and extend the buffer to at least 15m between ancient woodland and the development in accordance with REAC commitment B6 as set out in the CEMP and government guidance *Ancient woodland, ancient trees and veteran trees: advice for making planning decisions* - GOV.UK (www.gov.uk). Enclosed with this letter is an updated version of the Temporary Workers Accommodation Conditions Discharge Submission (June 2024, Rev P02), which includes the updated Construction Lighting Strategy (CLS), which is the same updated document submitted separately to partially discharge condition 20.

In respect of the comments from HCC Highways, as set out in the covering letter for the application, the CTMP for the temporary worker's accommodation has been submitted at the specific request of the LPAs following pre-application advice. As highlighted by HCC Highways, the CTMP measures presented reflect those set out in the CTMP for the construction of Phases 2 to 8, therefore there should be no concerns of potential confusion of the measures that are in place. The CTMP for the temporary worker's accommodation provides additional specific measures for the control and management of the temporary worker's accommodation and therefore compliments rather than contradicts the Phase 2 to 8 CTMP. Future Water therefore consider the two CTMPs can be approved in parallel to provide enforceable control over the construction phase of the implementation of the Havant Thicket Reservoir.



It is also acknowledged that a representation has been received from a member of the public. The comment made in this representation are addressed below in this letter.

The principle of having on site temporary accommodation for the contractor's workforce has been established as part of the hybrid planning permission and the documents submitted as part of the application including the Framework Construction Traffic Management Plan (HTR-ATK-XX-XX-RP-Z-0077) which includes a 'Caravan Laydown Area' on Figure 1. Subsequent to this, engagement with the community and stakeholders surrounding the reservoir project and accommodation on site has been ongoing via the project's Stakeholder Advisory Group and Environment Sub-Group. Concerns raised via these forums have been reviewed and addressed prior to the temporary workers accommodation application being submitted, however, this must be balanced with the requirements of Future Water to look after the welfare and safety of its employees.

Ecological impacts have been considered throughout the development of the temporary worker's accommodation plans and documentation. These have been assessed by a team of very experienced ecologists and have led to a number of control measures and mitigations being implemented, including, but not limited to, those detailed in Section 4 of the CEMP, page 8 of the CTMP, Section 6 of the CLS and table 3.1 of the HRA.

Construction Environment Management Plan

All staff living on site will attend an induction and be provided with a briefing on the rules of the site, nearby ecological and residential receptors and being a good neighbour. They will also be required to sign an internal Code of Conduct for living on site and will be made aware that, if breached, this may result in members of staff being removed from the site.

On site monitoring has been detailed in the CEMP in relation to environmental impacts and noise (alongside lighting within the Construction Lighting Strategy). An escalation process for additional points of concern (including behavioural concerns) is included below as Figure 1 (over the page) which expands upon the outlines provided in the CEMP.

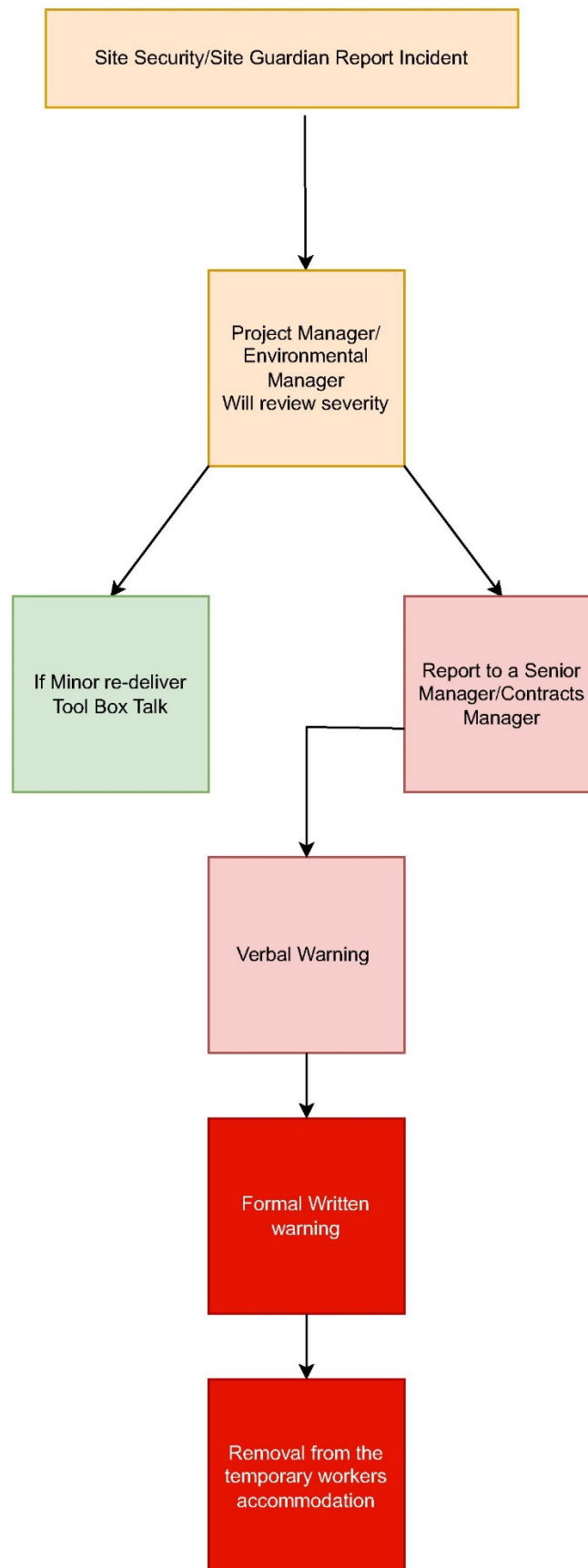
It should be clarified that although socialising outside is not prohibited, regulations regarding noise and other disturbances are applicable between 2300 and 0700 hours based on guidance from ecological professionals familiar with the site. Reference to "external sitting out space" was included in the application's Cover Letter in error as there are no dedicated locations where such socialising is encouraged.

Construction Traffic Management Plan

With the exception of comments regarding nighttime use of the Northern Access Road, the comments received regarding the CTMP have been addressed as part of the response provided to the Condition 12 discharge application. The use of the Northern Access Road for 'out of hours' vehicle movements is specifically related to the temporary worker's accommodation and this is therefore expanded upon below.

Vehicle movement restrictions (with the exception of emergencies) will be implemented as per page 8 of the CTMP. The timings of these restrictions will however, be varied based on the potential impacts posed at different times of the year, taking into account nesting and hibernation of present species. These restrictions, and the consequences of breaching them, will be briefed to those staying on site during the induction process and via update briefings as required.

Figure 1: Escalation process



Where vehicles do need to use the Northern Access Road (NAR) during the hours of darkness, dipped headlights will be used with reflective bollards in place for safety. These headlights are angled downwards, meaning the road will receive the greatest intensity of light rather than the surrounding trees and vegetation.

In relation to impacts to specific nocturnal wildlife, the following apply:

- Badger collision risk is mitigated by the low speed limit assigned to the NAR during construction works.
- Nightjars present within the woodland will nest in the middle of clear-fell, not on the narrow NAR where predator sightlines are reduced.
- Appropriate Natural England EPS licences are in place in relation to bats and dormice, with all conditions of these licences to be followed. With specific reference to bats, no bat roosts have been recorded along the NAR in bat boxes or natural roosting features.

Construction Lighting Strategy

The CLS has been developed by a team of industry specialists and engineers, and is considered a robust strategy to enable safe accommodation of worker's on site, balanced with need to reduce the potential for significant impacts of construction lighting to nearby residents and nocturnal species. The lighting layout appended to the Construction Lighting Strategy follows this specialist guidance and represents industry best practice with regards to minimum lux requirements, light spill mitigations and monitoring.

In accordance, light spill has been minimised by fitting light shields to luminaires to limit illumination at the compound boundary – illumination of the boundary from lighting spill has been calculated at 0.37lux average across the compound area. A warm white light source (2700Kelvin) will also be adopted to reduce the blue light component and a dark 15m buffer zone as detailed in the CLS will be implemented along the northern boundary.

Habitats Regulation Assessment

The HRA Screening Assessment focusses on the specific designated features of Singleton & Cocking Tunnels SAC as well as the integrity of the whole site. This has been developed by industry experts in line with DEFRA's HRA guidance.

The non-primary designated features for Singleton & Cocking Tunnels SAC are barbastelle and Bechstein's bats, with the Bat Conservation Trust (www.bats.org.uk) citing their foraging distances as follows:

- Barbastelles tend to forage over a wide area, with a typical nightly foraging radius of 7km
- Bechstein's bats tend to forage in woodland within one or two kilometres of their roost site.

For reference, Singleton & Cocking Tunnels SAC lie 17km from the site, with Southleigh Forest approximately 3km from the compound area.

The BCT Core Sustenance zones detailed are based on extensive literary evidence and are used often to determine the potential zone of influence for bat species. Deviations in home range by bats from the BCT Core Sustenance Zones would be rare and limited to few individuals, therefore this would not result in significant effects to the integrity of Bechstein's and Barbastelle bat populations associated with the SAC.

With the above spatial information and the mitigation measures throughout the application being considered, combined with the low likelihood of Bechstein's and Barbastelle bat species associated with the SAC being in the Scheme's area, it is considered that no significant effects will be experienced and the integrity of Singleton & Cocking Tunnels SAC will be upheld.

Conclusion

We trust that the above provides sufficient information to address any questions that you may have as a result of the public consultation responses received, however, if you have any specific points that require further clarification the please do not hesitate to contact me.

Future Water considers that the public consultation responses do not require any substantive changes to the documentation submitted to discharge the conditions and therefore request that the applications are determined as a soon as possible.

Yours sincerely

Andy Turner

Andy Turner
Technical Director

Cc: Portsmouth Water
Atkins
Future Water MJJV