

Havant Thicket Reservoir, Northern Access Route (EHDC ref 51680/003, HBC ref: APP/20/00990)

Thank you for providing the opportunity to comment on the Havant Thicket Reserved Matters Phase 1 planning application.

I have reviewed the documents submitted in support of the application and my response is attached.

You will see that I believe that there is additional/ revised supporting information that needs to be submitted before the application is determined for the Phase 1 works.

I have also made some comments relevant to;

- a) The discharge of planning conditions (Section 3)
- b) Detailed feedback on the Landscape Ecological Management Plan - LEMP (Section 2.11 and Appendix D)

Further work is needed on the LEMP before the obligation under the S106 agreement should be discharged.

Other documents were not included on the planning portal, my email below referred.

I hope that my comments are of assistance. If you have any questions, or wish to discuss any of the points please do not hesitate to contact me. I would be grateful if both councils could acknowledge receipt of my response.

Kind regards,

Tracey Viney

Havant Thicket Reservoir – Northern Access Route (EHDC ref 51680/003, HBC ref: APP/20/00990)

Reserved Matters for Phase 1 & various pre-commencement planning conditions

I have some concerns about the details submitted with the application and would request further consideration and submission of additional information in respect of a number of issues.

- 1.1 No information has been submitted on **how motorcycle access will be prevented** now and in the future. There is a need for a robust fence along the full length of the access road to prevent access to the Havant Thicket rides and woodland. A planning condition requiring provision for and maintenance in perpetuity of a robust fence is required.
- 1.2 Request for **additional passing places** where the existing gravel track is not being utilised in the design to assist with traffic flow.
- 1.3 Further information required in relation to the **new northern access gate**;
 - Further consideration should be given to the **proposed location** of the northern access gate to prevent fly tipping and anti-social behaviour within the bell mouth apron of the new junction at night.
 - The **opening hours for the northern access gate** are not provided.
 - Request for additional information on the **quality and appearance of the proposed new access gate and associated fencing**. Proposal for a bespoke robust metal gate and railings, incorporating art, to give this gateway main

entrance to the reservoir a commanding sense of place and arrival at a destination, while being in keeping with the rural setting.

- 1.4 Spacing of **retractable bollards – 5m is too wide** to prevent vehicle passage, and more thought needs to be given to how a vehicle, cycle and pedestrian gate(s) will be accommodated. Spacing of wooden bollards along road edge is not specified.
- 1.5 What is proposed where there are **gaps in the dead hedge** being provided as a wildlife corridor on the outer edge of the access road?
- 1.6 Why using a drainage 'detention basin' and **not utilising and enhancing the Bells Copse pond** as previously proposed for the benefit of wildlife?
- 1.7 It is not clear **where the northern drainage will go** after passing below the B2149 and whether there is an opportunity for a wildlife enhancement?
- 1.8 The Draft Recreational Access Plans for construction and operation in Appendix C of the Planning Statement have not been updated to address errors and reflect the feedback of stakeholders. **The location of the 'track to be available for cyclists' described in Section 4.54 needs to be repositioned in line with Env. Sub-Group feedback** and agreed, the surfacing must be self-binding gravel to HCC standards, not tarmac/ asphalt.
- 1.9 Concerns with respect to the Landscape Environment Management Plan (LEMP) which sets out the ecological mitigation, compensation measures and how they will be implemented.
 - Commitment to bolstering the SW boundary wildlife corridor missing.
 - Commitment to bolstering the eastern boundary wildlife corridor as part of the detailed embankment and path design missing.
 - Additional woodland triangle south of Round Wood missing / no commitment to provide the area of woodland originally shown in the 2020 planning approval.
 - Inappropriate location for new compensation flow stream in SW, impacting off-site mature trees. Stream route different to that shown in 2020 planning approval.
 - It is essential to retain delivery of annual seasonally fluctuating water levels in the retained wetland under normal operating conditions to maximise the biodiversity net gain.
 - Elements from the Outline Biodiversity Mitigation & Compensation Strategy submitted with the original reservoir planning application are missing (e.g. Bells Copse pond enhancement & birch mitigation/ compensation areas).
 - Prioritising the protection and enhancement of the remaining fragment of Ancient Woodland at Round Wood to establish an understorey and field layer.
 - Providing mitigation for the loss of skylark habitat/ territories during construction.
 - Ecological Clerk of Works is not to be independent, instead appointed by the Contractor. This not appropriate on such an environmentally sensitive site (see 3.8).

Further information is given on my concerns and the additional information that should be requested from the applicant in Section 2 below. Section 3 provides comments in relation to the request to discharge specified planning conditions.

2.0 Additional information on concerns and missing information

2.1 Preventing Motorcycle access

There is a significant problem with unauthorised motorcycle abuse at Havant Thicket. This has been a key concern constantly raised by residents on both sides of the reservoir site, as

well as recreational site users. The existing boundary track along which the new northern access will be routed is already being used by motorbikes to access areas where they scramble and cause damage to adjacent habitats. This will only get worse when the Cabbagefield Row site is developed by Portsmouth City Council, where unauthorised scrambling has taken place for more than 40 years. Stakeholders such as Rowlands Castle Parish Council, local councillors and many others (including myself) who responded to the original reservoir planning application made it clear that action is needed to prevent motorcycle abuse through intelligent design of the access points. Portsmouth Water gave assurances that this would be addressed at the detailed design and reserved matters stage. Unfortunately, there is no information in the current submission for the northern access road to indicate how motorcycle access will be prevented from the new northern access road.

- The Phase 1 Planning Statement makes some reference to anti-social behaviour (page 27 & 32) in the context of natural surveillance addressing this, but no specific reference to motorcycle abuse and how it will be prevented to protect the sensitive ancient woodland habitat through which the road will pass. Natural surveillance alone will not be adequate to address the risks.
- The maps submitted do not show a robust fence or other measures on the south and east side of the new access road to prevent motorcycles leaving the road and driving into the woodland. The drawings only show the provision of timber bollards spaced alongside the road to prevent cars parking along the verges. These will not prohibit motorcycle access to the verges or the woodland. The landscape plan 1 of 4 only shows a stockproof post and rail fence to the north of the B2149 junction on the Borrow land.
- On landscape drawings 1 to 4 no fence is shown but there is reference in note 5 to “Stockproof post and rail fence position including access gates to be defined at a later stage exact position to be confirmed by Forestry England and to avoid encroachment of any significant trees. Further tree surveys requested.” There is no information to indicate along which sections of the route the fence would be located.
- The Landscape Environment Management Plan does include Figure A5 which suggests there is a proposal to place a stockproof fence along the full length of the access road. If this is the case why is an indicative location not shown on the Northern Access Road landscape drawings, along with information on the materials to be used, in order to address previous site user, residents and stakeholder concerns?
- The pedestrian / cycle gate shown on Landscape Plan 3 of 4 for the Horndean access point will not prevent motorcycle access to the path (ride) and woodland. The type of gate to be provided here needs to be considered further.
- I am not sure if the type of field gate currently shown on the inset to Landscape Plan 1 of 4 will be adequate to prevent motorcycle access to the ride and woodland? The robust stockproof fence will need to link up to the gates to prevent a weak point in the access.
- There is a lack of detail on how motorcycle access will be prevented where the access road meets the turning head in the south. Where will fences be provided? Will ditches and banks be sufficient to prevent access, or will fences also be needed behind these features?
- A timber post and rail fence is shown on either side of the northern access bell mouth junction to the east of the new entrance gate. The fence is not shown joining up to the ditch, leaving a small gap through which motorcycles could pass to access the woodland. I am also concerned that motorbikes may be able to cross the relatively shallow ditches with perpendicular concrete ‘checkdams’ (150mm wide) along the visibility splays. The applicant must provide a robust fence, which ideally would be in

the form of metal railings, along the edge of the visibility splays and new road to prevent access to the woodland at this vulnerable location adjacent to the B2149.

Preventing motorcycle access to the woodland is essential to protect the Ancient Woodland habitats, European Protected Species and other wildlife from disturbance, which is a material planning consideration. It is also essential to prevent access to recreation tracks to prevent health & safety risks, accidents, and to protect the amenity/sense of place by maintaining a quiet rural environment for people to enjoy. This is particularly important in the northern area of the wood where recreation is not to be actively encouraged, to provide quiet areas where biodiversity can flourish. A well maintained robust fence along the northern access would also inhibit other recreational users straying from the new access road into the woodland (e.g. bikes such as bmx). This is the reserved matters application for the Northern Access Road and therefore it is essential that the issue of how motorcycle access to the woodland and recreation tracks will be prevented is addressed at this stage. The LPA should request further information on the indicative location and materials for the fences to be provided along the access road, before the application is granted consent.

In addition, **a planning condition should be applied requiring the approval, construction and ongoing maintenance (in perpetuity) of a robust fence and gates along the full length of the access road and junction to prevent motorcycle and other access into the woodland from the northern access road.** The fence must be in place before the construction fencing for the road is removed.

Reason: To protect the amenity and conservation value of the Havant Thicket Ancient Woodland.

2.2 Additional passing places to help with traffic flow

While I am sure that the engineers will have factored in the minimum number of passing places required to meet the highway requirements, some are quite a distance apart. I believe it would be useful to have at least two more passing spaces at key locations proposed below. This would have the added benefit of giving extra capacity, for example at busy times when people leave at the same time after an event, or if a vehicle were to break down and need recovery.

a) Some concern has been expressed by stakeholders about the risk of traffic queuing to get out of the new junction turning right on the B2149. An additional small passing place could be provided on the north side between chainage 190 and 200m, where the existing track crosses the new road and there are no trees. This would be relatively close to the junction and could help with traffic flow.

b) Between chainage 800 to 850m on the blind bend there is a passing place provided on the east side of the new road. There is the opportunity to also provide a passing place on the west side of the road at this location, over the existing track which is not being utilised at this point. Because there is an existing track at this point constructing the extra passing place will have no additional adverse impact on the Ancient Woodland/ trees. It would provide an opportunity for vehicles travelling from the visitor centre to the B2149 to be able spot a vehicle approaching from the other direction and pull in to stop with minimal reversing needed on the bend. I believe that this would make the blind bend safer to negotiate, especially as there is a very long gap between passing places from chainage 670 to 800m. No information is provided to indicate what will happen with the two disused sections of the existing track at 190 to 240m and 800 to 850m?

2.3 Northern access road gate

a) Gate location; The extended bell mouth apron present east of the currently proposed position of the access gate provides a very secluded location within the trees at night, increasing the risk of fly tipping and anti-social behaviour. I would propose that the gate be moved further east to ensure that at night the area available for pulling off the road at the junction is limited, allowing good surveillance from passing traffic, as that will help to

discourage anti-social behaviour. If the gate is located at a wider part of the bell mouth as suggested above metal railings will also be needed to secure the access road at night. If for some reason it is not possible to move the gate to the east retractable bollards should be placed within the bell mouth to prevent access to the narrower more concealed part of the bell mouth. These would need to be electronically operated to make the task of opening and closing the site practical, as it is a very wide entrance.

b) Opening hours for the gate; Even though this is a detailed reserved matters application there is no information to indicate what hours the northern gate will be locked between. **A planning condition should be applied to stipulate that the gate must be locked at night and the hours agreed with the Local Planning Authority.**

Ensuring the site roads are closed at night with a robust locked gate is a key part of the biodiversity mitigation strategy to protect the night time ecology at the site.

c) Appearance & incorporation of art into the design of the entrance gate; No detail has been provided as to the nature and appearance of the proposed new entrance gate. This is to be the 'gateway' to the new leisure facility and is immediately adjacent to the boundary of the South Downs National Park. It is important that a landmark entrance gateway is provided which is in keeping with the rural character of the area. I would suggest that the applicant provide;

- A bespoke 2m high metal gate which incorporates an element of art into the design. For example, wildlife features such as a kingfisher, the Portsmouth Water company emblem.
- Estate style metal railings (attached to and in keeping with the style of the gate) should be used to frame the junction and visibility splays to give the entrance a commanding sense of place and arrival at a destination, while also addressing concerns about unauthorised access (see 2.1).

It is important that the gate is not just a utilitarian structure with no character. It is a requirement of the LPA that Portsmouth Water incorporate art into the project. The company have previously indicated that they will do this through use of street furniture to help minimise the potential for vandalism/ anti-social behaviour. The gates at the site have previously been used by Portsmouth Water as an example of how this could be achieved, see Appendix A.

2.4 Bollard spacing / multi use access needed

Landscape Plan Sheet 3 of 5 refers to retractable bollards being placed at 5m centres where the ride meets the new road. This is too wide as it will allow a vehicle to pass through and park.

On the General Arrangements Plan (2 of 4) there is also a symbol to show a field gate will be provided for access to the ride for management behind the pedestrian gate. A detail should be provided to show how the field gate and a pedestrian/ cycle gate will be accommodated which does not allow motorcycle access. Is there an option for a more versatile multi-user gate which can also accommodate vehicles?

Further thought needs to be given to the design of the interface between the new northern access road and the enhanced cycle / pedestrian path (which will eventually be the link to Land East of Horndean). Given this submission represents the reserved matters application more detail is required to demonstrate how this junction with the new road will work in practice.

The spacing of wooden bollards along road edge to prevent parking on the verge is not specified. The landscape plans seem to show them at 5m centres. This may not be enough to stop smaller cars parking between the bollards on the verge.

2.5 Provision of a dead hedge as a wildlife corridor - gaps

The landscape drawings show a dead hedge on the outer (north /west) side of the northern access road. This is described on the text labels as; "Infill western boundary of the northern access with site won brash to allow for a functional wildlife corridor." The dead hedge is shown as discontinuous in places, for example, behind some passing bays (230 to 260m,

330 to 370m, 530 to 570m). If the dead head is to provide the function of a wildlife corridor what is proposed at these gaps?

2.6 Why not utilising/ enhancing the Bells Copse pond?

Landscape Plan Sheet 4 of 4 and the Drainage Layout Plan (3 of 3) show a small 'detention basin' to hold surface water drainage from the southern end of the enhanced roadside drainage ditch. This is to have a 'hydrobrake' to slow flows during storm events. The existing pond feature immediately to the south appears to be unchanged on the base map. The Outline Mitigation & Compensation Strategy submitted with the original planning application allocated this as a 'pond enhancement area', but this no longer seems to be proposed. The Landscape Environment Management Plan (Figure A6) just shows this area as having some tree clearance instead of a pond enhancement. Appendix B includes both maps for ease of reference.

Additional water storage is clearly needed at the southern end of the new access road, so why is the developer proposing to create a separate small retention basin when the obvious solution is to have a pond enhancement project to allow the existing pond to store more water, plus hold water for longer which will then provide much more additional wildlife value. If that cannot be achieved by deepening and/ or enlarging the existing pond alone (which I believe it could), then a hydrobrake could still be fitted to the outlet from the enhanced pond to control its surface water discharge during a storm.

I propose that the existing pond at Bells Copse is enhanced to take the additional surface water road drainage, rather than build a separate detention basin. A revised drawing should be requested by the LPA and provided by the developer to show the enhanced pond in order to optimise the wildlife benefit of the scheme.

2.7 Where does the northern drainage go? – opportunity for enhancement

The ditches at the B2149 junction are being widened to accommodate more surface water run-off and that will pass through a culvert which will be replaced flowing east below the B2149. There is no indication as to where the existing culvert (replacement pipe) will flow to. Looking on google it appears that a short distance into the woodland there is a clearing which I assume is an ephemeral pond within The Holt, an area currently managed by Forestry England.

If the surface water does drain to a pond, is there an opportunity for a pond enhancement project to increase the wildlife value of the pond? If so enhancements should be undertaken at the pond. For example, creating a deeper area to hold water for longer and allowing more light into the pond area?

2.8 Recreation plans not updated to reflect stakeholder feedback including proposed cycle track

The Draft Recreational Access Plans for construction and operation in Appendix C of the Planning Statement have not been updated to address errors and reflect the feedback of stakeholders, especially the Env. Sub Group feedback that the alternative proposed surfaced cycle route to be provided should not be located in the northern part of Havant Thicket. The alternative cycle track route submitted to Portsmouth Water by the Env. Sub Group is shown as a pink solid line on the annotated map in Appendix C, along with the priority areas of Havant Thicket that need to be retained as quiet areas for the benefit of biodiversity.

Planning Statement, page 49 (5.59) confirms that the existing northern boundary track will no longer be available for cycle use while the Phase 1 scheme is being constructed. As the proposed 'track to be available for cycle use' shown on Appendix C2 is an alternative permissive route for use during the construction of the northern access road, and the track is to be retained thereafter (Planning Statement, page 35, 4.54 refers), I would propose that the location and surfacing of the route should be confirmed and agreed now as part of the Phase 1 reserved matters application. The route should be as shown as a pink solid line on the Env. Sub Group annotated map (Appendix C of this document), with a suitable smooth gravel surface to be in keeping with the rural character of the area.

Surfacing for permanent North/South pedestrian cycle link up 'The Avenue' track to be the link to Horndean is described as having being 'upgraded to a hard and firm self-binding

gravel' surface (Planning Statement, page 35, 4.54 refers). This should also apply to the track to be available for cyclists referred to in Section 4.54. Tarmac surfacing should not be used to upgrade surfaces within Havant Thicket, as it is not in keeping with the rural character of the area and will only encourage cyclists to travel faster, which is not appropriate on these multi-user paths.

Designated quiet areas where recreational access to the woodland will not be encouraged need to be shown on both the updated recreational access plans and on the LEMP map, as maintaining quiet areas within the Ancient Woodland is essential to the success of the Biodiversity Mitigation & Compensation Strategy.

2.9 Protection of the Park Pale bank

The Phase 1 Planning Statement refers at page 47 (5.36) to keeping the width of the road to a minimum where it passes through the Park Pale bank.

There should be a specific requirement to fence off the bank during construction works to protect the bank from accidental damage, storage of materials etc. This should be confirmed in the Planning Statement and CEMP.

2.10 Construction Support Site – Where is this?

The Phase 1 Planning Statement refers at page 41, row 5, to a 'Construction Support Site' for contractor parking. Where is this to be located?

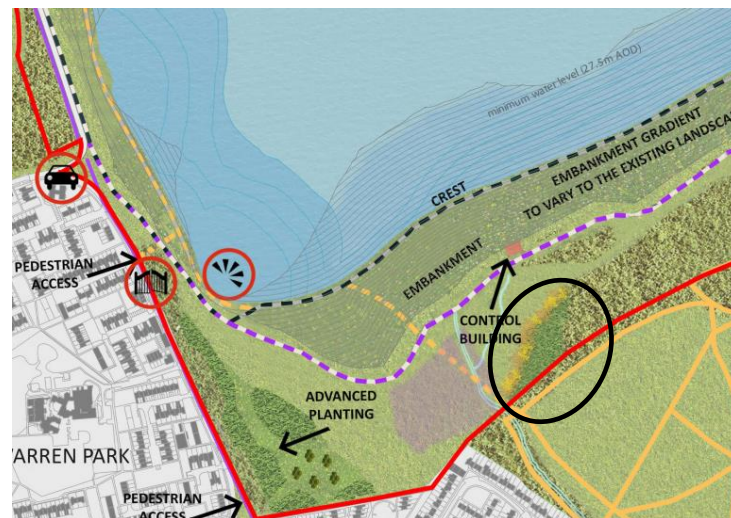
Please confirm that this will not be at Rowlands Castle, nor at Swanmore Road?

2.11 Landscape and Ecology Management Plan (LEMP) – matters that need to be addressed

The Planning Statement page 17 (3.11) confirms that the Section 106 agreement includes commitments which will need to be discharged prior to commencement of development, including a Landscape Ecological Management Plan. Section 1.3 (page 9) of the LEMP submitted with the application documents states "the Strategy and LEMP together fulfil Schedule 1 Part 1 of the s106 Agreement". Having reviewed the documents I do not believe they should be considered sufficient to discharge this obligation. Although the July 2022 updated LEMP is a big improvement on the earlier draft seen in spring 2022, there is still more work needed to make it robust to ensure that all of the commitments previously made by Portsmouth Water are included and clear. There are key things we have discussed at the Env-Sub Group that have not been included in the revised document. Things I have noted of particular concern are set out below, with more detailed feedback on the LEMP provided in Appendix D.

- a) With the loss of The Avenue and associated connectivity between the Staunton Country Park and Havant Thicket woodland blocks it is essential that wildlife corridors are bolstered around the east and west side of the site.
 - Natural England and the reservoir Env Sub group have stressed the need to **bolster the SW boundary wildlife corridor** with additional tree planting to fill in existing gaps and provide more robust connectivity. This is completely missing from the LEMP and must be added to the maps (e.g. Figure A4). P.Water have recently committed to sub-group members that a bolstered corridor will be provided incorporating a deer fence and some of the 80 trees to be relocated from The Avenue. This commitment needs to be added to the LEMP along with some detail on the width of the corridor and proposed planting to be undertaken to provide an effective corridor.
 - There is currently a weak link in the eastern boundary wildlife corridor where the Phase 1 planting meets the properties & paddock off Manor Lodge Road, where the existing tree corridor is very narrow (one tree width). The commitment to **bolstering the eastern boundary wildlife corridor** as part of the detailed embankment and path design in the east is currently missing from the LEMP. A clear statement should be added to ensure that it does form part of the Principal Contractors design requirements. Page 46 (7.4.4) only currently refers to 'retaining' connectivity not enhancing it.

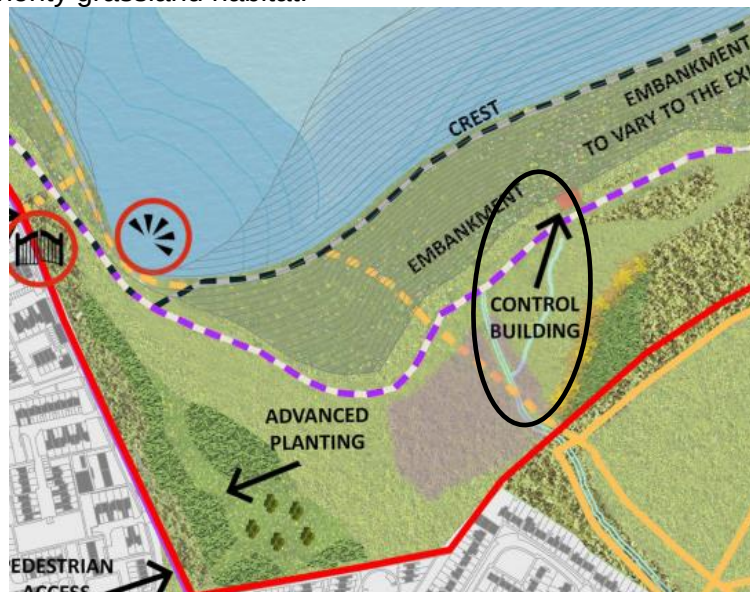
- No Dormouse boxes are shown in and around the Phase 1 planting on Figure B4 of the LEMP. The Outline Mitigation Strategy indicated that 25 boxes should have been provided. The LPA should ensure that these boxes are in place before The Avenue is removed. Additional boxes should also be put up in suitable trees to the north of The Avenue and north of Middle Clearing where dormouse are to be displaced along the existing willow tree lines into Havant Thicket.
- b) The original Outline Masterplan (HTR-ATK-ZZ-ZZ-DR-L-0001) for the reservoir approved by the LPAs included planting a **new triangle of woodland** connected to the SCP woodland to the south of Round Wood (circled in black on the map extract below).



This woodland has been replaced by a thin red line showing a narrow line of scrub creation on Figure A4 in the LEMP. The reduction in the area of woodland to be planted at the site is not acceptable, especially given the areas of Ancient Woodland to be lost. The LPA must ensure that the missing area of new woodland planting is included in the LEMP before any phase of development commences. If P.Water have a concern about whether the Contractor will need this land during construction of the reservoir/ pipeline, then the timing of the woodland planting can be later in the 5 year programme, but the tree planting should take place as soon as possible after that issue is resolved.

- c) The original Outline Masterplan (HTR-ATK-ZZ-ZZ-DR-L-0001) for the reservoir approved by the LPAs included the **location of a compensation channel water course** from the control house to the Riders Lane Stream in the SW of the site (circled in black on the map extract below). This new watercourse was shown being wholly within the red line boundary. Figure A6 in the LEMP now shows the proposed new channel realigned and joining the stream further south in an off-site location beyond the red line boundary. This is completely inappropriate. The new channel will be designed to take large volumes of emergency drawdown water which will involve the need for very robust engineering of the headworks and channel where it joins the Riders Lane Stream. The construction of the channel and associated structures will have a significant adverse impact on the existing mature off-site oak woodland, including at least one veteran oak tree. It will also adversely impact the access route for grazing animals needed for grassland management, and the new proposed access route to the embankment. The location is in an area where an existing path crosses the stream, where there are problems with anti-social behaviour, including fly tipping. The revised location for the reservoir compensation channel is not appropriate and the LPA should ask for Figure A6 in the LEMP to be revised to confirm the channel will terminate within the P.Water land holding and red line boundary further to the north.

This will have the additional benefit of the new channel being able to wet more of the proposed priority grassland habitat.



- d) The biodiversity net gain of the new retained wetland was to be optimised by an operating regime that would ensure there were **annual seasonally fluctuating water levels in the wetland**. This was confirmed in the Atkins Technical Note, Wetland Concept and Outline Design, document reference: HTR-ATK-XX-ZZ-RP-Z-0001. The page 35 LEMP text confirms that the “Wetland water levels will naturally fluctuate “, yet the text in the LEMP at page 50 & 91 no longer seems to commit to delivering annual seasonally fluctuating water levels in the wetland. Instead, I am concerned that page 50 (7.8.1 & 7.8.3) seems to suggest water levels will now only naturally fluctuate when the main reservoir level is low (i.e. during drawdown). If the operating regime for the reservoir does not allow seasonally fluctuating water levels in the wetland, which in turn annually expose emergent islands for breeding birds and muddy edges for migrating waders (as set out in the April 2020 Technical Note e.g. Table 4.1 row 1, page 22 and Figure 3.9) then the expected biodiversity benefit will not be delivered. The LPA should ensure that Section 7.8 of the LEMP is updated to refer to the retained wetland delivering annual seasonally fluctuating water levels and provision of emergent islands.
- e) There was to be a **pond enhancement in NE of Bells Copse** which is no longer shown on the LEMP maps, instead Figure A6 just shows some tree clearance. The Bells Copse pond enhancement was shown on previous mitigation maps (Appendix B, Map 1 of this document) and was still on Atkins Figure A3 in the March 2022 draft Biodiversity Mitigation and Compensation Strategy. Section 1.6 and 2.6 of my comments above identify the potential for the northern access road site drainage to be linked to the pond at Bells Copse as a habitat enhancement, helping to keep the existing pond wetter for longer. Given that this is an environmentally led scheme, it is difficult to see why this has not been proposed. The title in Section 7.13 of the LEMP implies pond enhancements only apply in Reach 4, but Section 7.13.2 does make a reference to the Bells Copse Management Area, but what is proposed is not clear. The LPA should require that the pond enhancement at Bells Copse is shown on the LEMP Figure A6 and that the text describes the work planned for the pond, not just clearance off willow trees.

Note: The visitor centre car park drainage which is not part of this current reserved matters application could also be directed to the enhanced pond in Bells Copse.

- f) Section 7.5 of the LEMP confirms the need to provide suitable fencing to prevent access by people and dogs to ecologically sensitive areas. Figure A5 is provided to show the location of proposed fences and gates. However, not all necessary fences are shown. **Figure A5 needs to be updated to show stockproof fences or deer fences as appropriate;**
- Along the eastern boundary linking the embankment fence to the fence shown along the NE reservoir boundary to keep stock in and people/ dogs out of the NE grassland area from the eastern perimeter path.
 - Around all of the pond enhancement areas. As was discussed at the Env. Sub Group site visit dead hedges alone will not be adequate to keep dogs and people out of the ponds, especially as dogs are used to being able to enter these ponds, and dead hedges will degrade with time/ access. At the site visit FE indicated a stock fence and dead hedge to provide landscape screening would be needed. At present only a dead hedge is shown on Figure A6 around pond enhancement areas. Section 7.13.1. of the LEMP confirms that both a fence and dead hedge should be utilised.
 - On the woodland edge of reach 1 and 2 where top water level stream incursions are shown to stop access to the woodland/ wetland in the south, and along the stream corridor to the north.
 - There is gated access to the ride south of the Category A FE track down to a wetland view point. A fence will need to be provided between the NE boundary fence at the west end, north up to the gate on the Cat A track to prevent access to the wetland via the woodland from this ride.
 - Fencing and gates need to allow a route for animals to get from Gipsies Plain to graze the NE grassland area of the reservoir site, as grazing would be the optimum habitat management for this grassland area. The NE grassland needs to be securely fenced for grazing.
- g) **Inappropriate management is proposed for the Phase 1 & 2 areas** already planted in Section 7.1 of the LEMP (page 40). Given that this is a habitat in transition from grassland to woodland, with the transitional ruderal vegetation and developing bramble scrub providing an important wildlife corridor and habitat for birds, reptiles, small mammals and invertebrates during reservoir construction, more sensitive bespoke management is needed for each planted block. Further detail is provided in Appendix D (7.1).
- h) Prior to approval of the **Phase 1 and 2 planting** project by the LPA P.Water committed a **10 year period for maintenance**, monitoring and replacement of trees to ensure that the new woodland planting became established as quickly as possible. The LPA should request that the LEMP is updated in Section 7.1 (page 40) to include a 10 year maintenance period for the Phase 1 and 2 planting instead of 5 years. Given that appropriate management of the Phase 1 and 2 areas has not taken place over the past 2 years, as a minimum the 5 year annual maintenance period should commence now and continue to 2027. The text currently refers to 5 years from planting which would be c.2025, while the 5 year programme in App C of the LEMP shows ongoing management to 2027, so there is an inconsistency. The LPA should press for annual maintenance for 10 years, or as a minimum maintenance to 2027.
- i) The enhancement of the remaining fragment of **Round Wood (Ancient Woodland)** should be a priority. A deer fence should be provided urgently and actions taken as soon as possible to ensure the development of an understorey and field layer of vegetation, as set out in the LEMP Appendix B6 specification text. Currently no date has been proposed for this work in the LEMP work programme, Appendix C row 21B only indicated that the management of Round Wood would commence within 5 years.

The LPA should press for the woodland management work and new tree planting needed in Round Wood to be completed in 2023.

- j) Proposal for racks and haloing in some of the birch blocks previously committed to is not shown on Figure A7 of the LEMP, nor is the text clear on what is proposed. For example, **racks / haloing is not currently shown for compartment 6507A & E, or around the Forest Glades in 6502A and 6508A.** These were previously shown on the site mitigation maps (e.g. Figure E3 submitted with the Bat Habitat Management & Maintenance Plan, as well as in the March 2022 draft Detailed BMCS), so why are they no longer being shown? The LPA should press for all of the mitigation / compensation areas shown within Havant Thicket on Map 6 of the Outline Biodiversity Mitigation & compensation Strategy (Sept 2020) to be included in the LEMP. As that is the document which supported the reservoir planning application and was granted permission.
- k) Amphibian re-location from Upper Lake is referred to in the LEMP and shown in the Appendix C work programme for completion in April to June 2022. However, this work was not completed in 2022. The LPA need to press to ensure that a revised date for this work is added to the LEMP programme for completion at an appropriate time of year before the Upper Lake is adversely affected by construction.
- l) No mitigation for skylark habitat to be lost during construction is mentioned in the LEMP. The reduced area of grassland post construction will not adequately compensate for lost territories, especially given the increased level of disturbance from higher visitor numbers. P.Water previously advised that a specific budget had been allocated for skylark mitigation work, which presumably would be offsite, so it is important to understand what they are proposing and when? The work needs to be agreed and implemented before next years 2023 breeding season starts and reservoir construction is underway. *Note: The off-site grant scheme is not due to commence until 2030, so that will not be providing any short term mitigation/ compensation.*
- m) While the text states that the off-site provision of 80ha woodland and the ecological management of Southleigh Forest are not included in the LEMP (Page 9), I believe that prior to commencement of any works pertaining to the reservoir project (including phase 1 northern access road) the LPA need to ensure that P.Water have committed to a timescale for starting actual delivery of these mitigation & compensation measures, which are required due to the loss of Ancient Woodland on the site. They should also be required to provide detailed management plans to show how the off-site projects will be delivered and when, before the main reservoir construction commences, as the Ancient Woodland loss will already have occurred in 2022 by then.

2.12 Detailed Biodiversity Mitigation & Compensation Strategy (DBMCS)

The updated DBMCS has not been provided to stakeholders or the public for review and comment.

3.0 Comments in relation to request to discharge planning conditions

3.1 Request for discharge of Condition 2 (by phase)

Condition covers siting, scale and external appearance. Insufficient information has been supplied to enable discharge of Condition 2 for the Phase 1 northern access road in relation to;

- Siting of fences along the access road, spacing of wooden bollards etc. (see 2.1 & 2.4 above)
- Appearance of entrance gate, other gates and fences (see 2.3 above)
- No detail provided on the pond enhancement in the NE of Bells Copse (see 2.6 above)

3.2 Construction Environment Management Plan (CEMP) – Condition 5

The LEMP at page 8 & 9 refer to the CEMP which is critical to ensuring appropriate mitigation measures are identified and implemented during construction, with examples of

where the CEMP will provide the necessary detail as to how existing retained habitats will be protected referred to in 10.25 and 10.26. The CEMP has not been provided.

The Phase 1 Planning Statement, page 17, indicated that the CEMP will be submitted by the contractor to the LPA. The CEMP will set out how ecological interest and habitats at the site (including Ancient Woodland) will be protected during construction and is essential to understanding whether what is proposed is robust. In many places the submitted reports refer to the detail needed being submitted in the CEMP.

- Will this be submitted for consideration before the Phase 1 reserved matters application is determined?

Page 17 also confirmed that Condition 5 must be discharged for Phase 1 before the northern access route construction can commence.

The construction fencing proposed in the CEMP must be adequate to ensure that motorcycles cannot get along the northern access route and visibility splays during the construction, nor into the wood from the access. A map should be provided in the CEMP to show the proposed location of robust fencing which will prevent motorcycle access.

3.3 Night time working - Condition 11

The original outline consent prevents night time working at the site, unless a scheme is submitted and approved by the LPA. Given that the new access road is to be built through the Ancient Woodland it is essential that there is no night time working permitted.

The Phase 1 Planning Statement refers on page 40 (4.83, last bullet) to; “*Restricting when work can be carried out i.e. not overnight, **except** where all impacts can be fully mitigated.*”

Night time working would require lights which would impact on bats and the night time ecology of the Ancient Woodland. Therefore, night time working should not be permitted for the Phase 1 construction.

The LPA need to consider whether the prevention of night time working is adequately covered by the existing hybrid planning consent Condition 11, or does there need to be a condition specifically attached to any consent granted for the Northern Access Road to prevent night time working during construction of the road, junction and associated structures? (Reason to protect the night time ecology including European Protected Species)

3.4 Request for discharge of Condition 28 – Landscape & Planting Proposal (by phase)

Condition 28 requires inclusion of; specification, planting method, schedule of plants/sizes, manner and treatment of watercourses, details of hard surfacing and timetable for implementation. Missing information includes the following.

- No detail has been provided for surfacing of the replacement cycle route through Havant Thicket (see 2.8 above) to be created in place of the existing track along the northern access route.

- The 5 year implementation plan (programme) set out in Appendix C to the LEMP needs to be updated to provide further clarification on tasks and timing. More information on what is needed is provided in the detailed feedback in Appendix D of this document.

Additional issues that need to be addressed prior to submission of the next phase;

- A triangular area of planting south of Round Wood shown on the Outline Masterplan previously approved by the LPA is not included in the LEMP.

- Not provided information on the manner and treatment of water courses. Information indicated to be provided on Figure B5, but this just showed the provisional location a new water course in the east of the site.

- The location shown for the new watercourse in the SW (Reach 8) is not appropriate. The new water course is shown terminating off site (outside the red line) in an area of mature woodland which would be damaged by construction of the channel and associated head works required for the compensation flow and emergency drawdown.

It would be extremely helpful if the LEMP provided one overview map illustrating all of the landscape mitigation and compensation features, as was attached to the draft DBMCS. This would be in addition to the small area maps already provided.

3.5 Request for discharge of Condition 32 – Drainage scheme (by phase inc. long-term maintenance)

Drainage issues not yet resolved relevant to Phase 1 include;

It is not clear why a drainage 'detention basin' is shown on the plan at the southern end of the new access road, rather than utilising and enhancing the Bells Copse pond as previously proposed for the benefit of wildlife?

Further information should be submitted confirming how and when the existing pond in the NE of Bells Copse will be enlarged, deepened and connected to the increased surface water drainage which will flow from the proposed new section of road, which needs to be delivered for the benefit of ecology.

It is not clear where the northern drainage will go after passing below the B2149, and whether there is an opportunity for a wildlife enhancement?

There does not appear to be any information submitted on the long-term maintenance provisions for ditches and drainage features in Phase 1 area. This information was not supplied in the Drainage Management Plan.

3.6 Request for discharge of Condition 36 – Ecological Mitigation & Compensation Measures (by phase)

Condition 36 requires that all ecological mitigation is in accordance with the Outline Biodiversity Mitigation Strategy (ECOSA 2020). However, the information submitted in support of the Phase 1 reserved matters application does not meet this requirement. The following commitments were included in the Outline Strategy which are missing from the LEMP.

a) A pond enhancement in the NW of Bells Copse is missing. This should be part of this Phase 1 submission, but no detail is provided on how the pond will be enhanced in association with the northern access road drainage system.

b) Racking/ haloing in woodland compartments 6507A & E, and around the Forest Glades in compartments 6502A and 6508A are missing.

As well as providing this information, commitments to wildlife corridor enhancements in the SW and E of the reservoir should clearly be set out in the LEMP text and maps before Condition 36 is discharged.

As a minimum, before the phase specific pre-commencement ecology condition 36 is discharged for Phase 1;

- Further information should be submitted confirming how and when the existing pond in the NE of Bells Copse will be enlarged, deepened and connected to the increased surface water drainage flowing from the proposed new section of road, which needs to be delivered for the benefit of ecology.
- The LEMP maps (Figure A7) should be updated to show that scalloped edges with graded habitat, managed on rotation, will be provided along the SE side of the northern access where there are appropriate uniform birch stands. This will help to optimise the habitat along the road for a range of species by providing a greater variety of micro habitats with different climates (Appendix D, 7.20)
- Survey work has shown that the trees being removed for the junction visibility splay form part of an important commuting route for bats between the The Holt/ Stein Wood and habitat on the Land East of Horndean site (LEOH). At the time of the original planning application P.Water made a commitment to work with adjacent developers, including LEOH, to minimise the impact on bats and coordinate mitigation/ compensation strategies. This is especially relevant to the impacts resulting from the tree loss along the B2149. There is no information within the submitted documents to indicate that this commitment is being delivered. I would have expected that as a minimum this would have been mentioned in Section 5.3 of the Phase 1 EMC&EM report. This should be added.

3.7 Request for discharge of Condition 37 – European Protected Species Licences

The EPS Licences are supported by Management Plan. For example, the Bat Management & Maintenance Plan. Figure E3 included in that plan shows additional mitigation and compensation areas to be completed within Havant Thicket which are not included on the plans provided with the LEMP.

A revised plan must be submitted with the LEMP to confirm that all of the birch management works illustrated on Figure E3 will be completed as a part of the LEMP programme.

3.8 Request for discharge of Condition 38 – Ecological Clerk of Works (ECOW)

For the preliminary works/ site clearance to date the ECOW has been provided by the contractor. There have already been problems identified where ecological good practice has not been followed, for example, in relation to vegetation clearance. Section 1.6 and Table 8.1 (row B3) of the Phase 1 Ecological Mitigation Compensation & Enhancement Measures (EMC&EM) state that the ECOW is to be appointed by the Reservoir Contractor team.

Section 6.1 confirms that P.Water will delegate this role. I am concerned this means that the ECOW will report to and be funded by the Contractor, putting them in the position of 'poacher and game keeper' which I do not believe is appropriate on such an environmentally sensitive site.

The ECOW needs to be fully independent from the Contractor and employed directly by Portsmouth Water, reporting to their Environmental Manager. They need to be the ecological eyes and ears on the ground to ensure that all aspects of the CEMP, Detailed Biodiversity Strategy and LEMP are followed. They also need to work very closely with ECOSA who hold and have responsibility for the EPS Licences, ensuring at all times that the requirements of the licences are upheld and the required management and monitoring is in place. Having a competent person appointed who is independent from the Contractor carrying out the works will ensure that there is no potential conflict of interest when reviewing, supervising, or reporting on works at the site which have potential ecological impacts.

The CV of the ECOW and terms of appointment / authority under the contract should be provided before Condition 38 is discharged. The ECOW must have authority to stop works being undertaken at the site by any Contractor, if they are concerned that the activity, is or could, be having an adverse impact, or is not being undertaken in accordance with best practice.

3.9 Request for discharge of Condition 39 – Soil Management Plan (by phase)

The submitted *Framework* Soil Management Plan (FSMP) appears to be appropriate for protecting and reusing ancient woodland soils in the Phase 1 area, as well as safe guarding acid grassland soils along the access road route. However, I do still have concerns about the wider strategy in relation to the main phase of works on the reservoir site for which an updated SMP is to be submitted.

The Vegetation Assessment submitted with the original reservoir planning application identified that there were some notable plants and areas of acid grassland along the existing northern access track. The botanist noted that this habitat is very uncommon in Hampshire and thus it is important that this soil should be identified, removed, stored separately and reused on the road verge from where it was taken to give it the species present the best chance of survival. I was pleased to note that Section 4.7 & 4.8 of the FSMP does now refer to undertaking a pre-construction survey to map locations of notable and noteworthy species within the Phase 1 construction footprint, so that species can be protected in situ, or salvaged, as well as identifying the acid grassland areas along the track where ancient woodland soil should not be spread. As the construction work for the northern access is programmed for this winter, the detailed vegetation survey already needs to have taken place as plants will have died back. The LPA need to check that this has been completed already and request a copy of the report/ vegetation map.

Note: Section 1.12 of the Phase 1 EMC&EM indicated that a Vegetation Survey was undertaken by Atkins in January 2022. The report is not included in the submission and would not be adequate to identify notable plant assemblages or species as it was not undertaken at the appropriate time of year for many notable plants to be visible.

Appendix A

Examples of entrance gates/ railings incorporating art, some previously used by Portsmouth Water in stakeholder and community presentations, as an example of how art could be included in the design of street furniture



Testwood

Lakes



Reedbed gate



Cycleway barrier

Examples of how metal railings can be used to incorporate art or give a distinct sense of place

Bridge railings at Kielder Reservoir

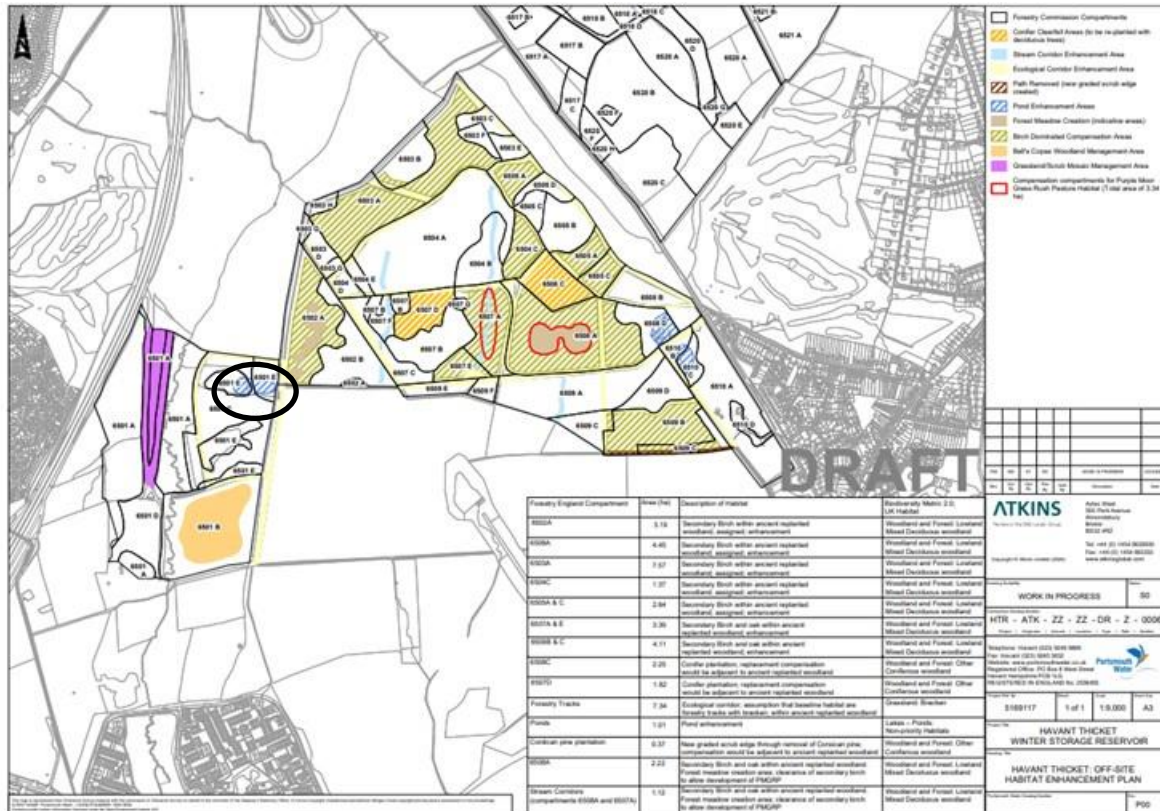


Havant park railings



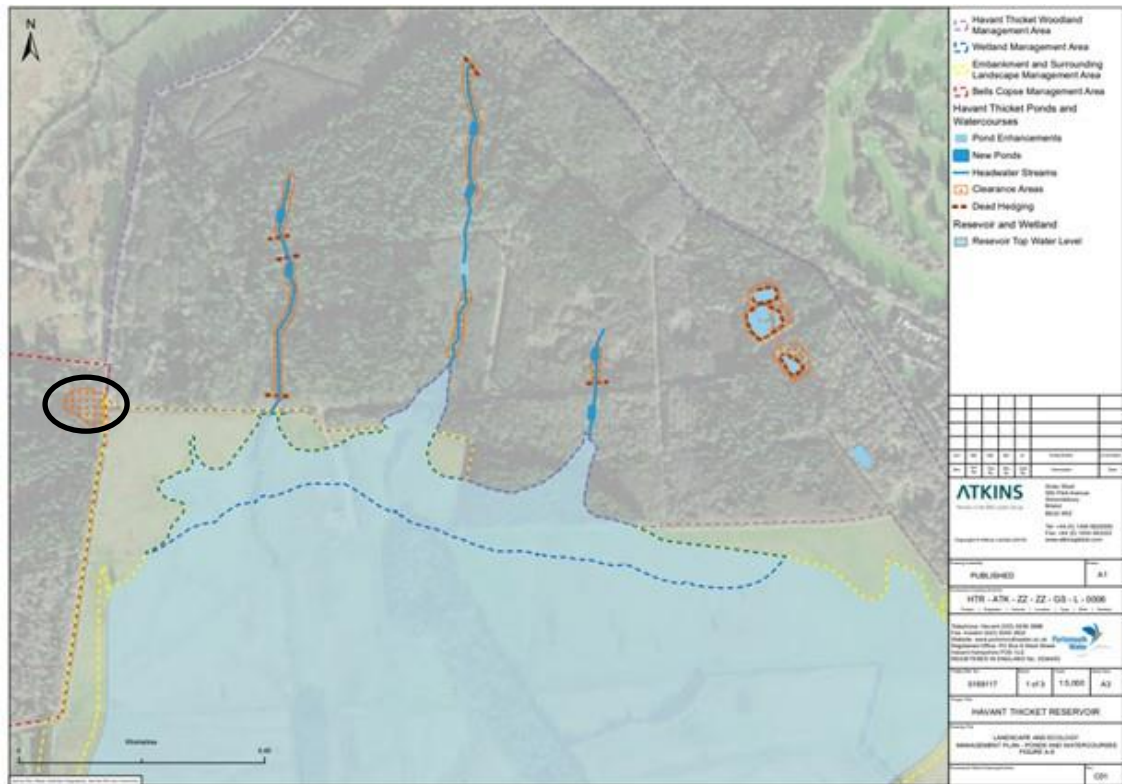
Appendix B

Atkins Map for P. Water showing the Bells Copse Pond Enhancement Area – March 2020



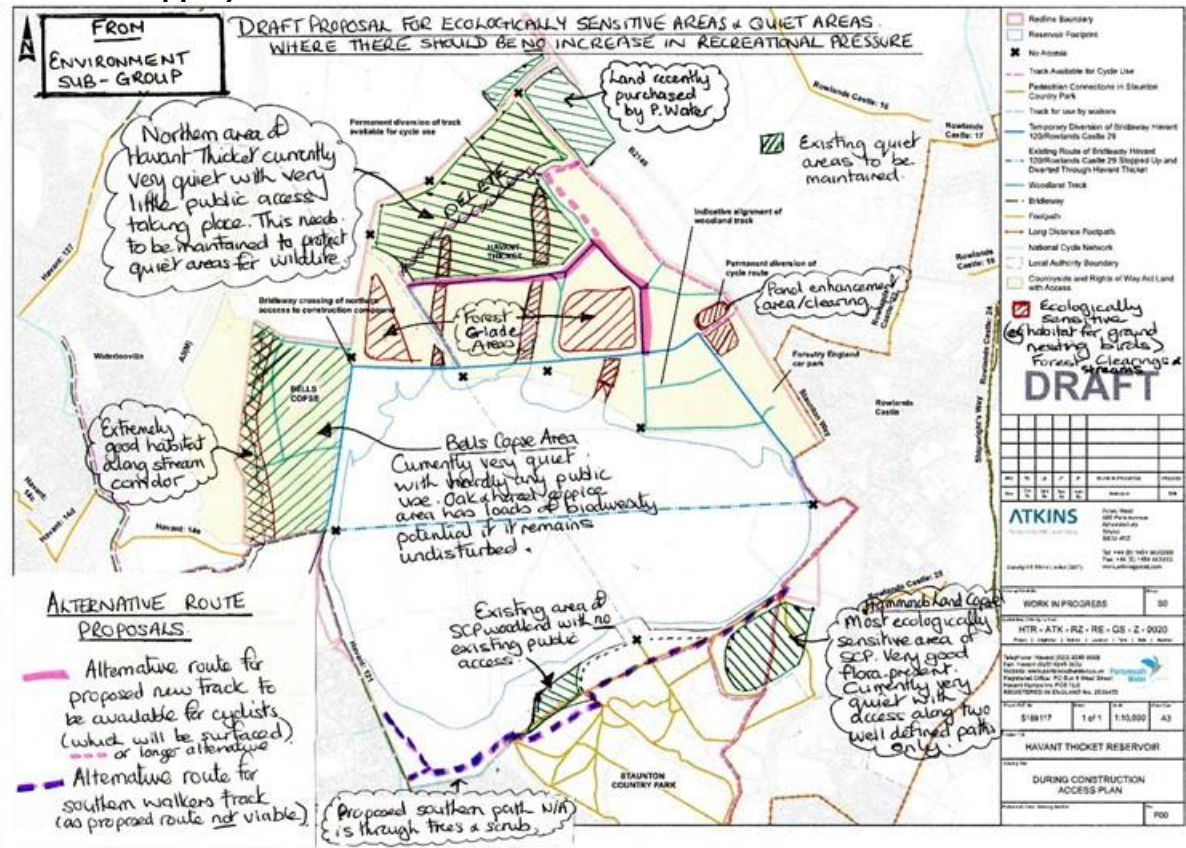
Note: The Bells Copse pond enhancement & additional birch management areas were still shown (as above) on the Atkins January 2022 plan in the draft Biodiversity Mitigation & Compensation Strategy.

Figure A6 – Landscape Environment Management Plan (July 2022) – no pond enhancement shown



Appendix C

Environment Sub-Group feedback on draft Recreational Access Plan (re-Planning Statement App C)



Solid pink line – Env Sub-Group proposed route for new surfaced cycle track during construction of the northern access

Note: Draft planned cycle track route further north deleted as not considered appropriate, as in an area of Havant Thicket that needs to be retained as a quiet area for the benefit of biodiversity.

Areas where recreational pressure should be minimised for the benefit of biodiversity

Green hatch – Northern area of Havant Thicket and Bells Copse to be retained as quiet areas where no new recreation is encouraged

Red hatch – Ecologically sensitive area of the site where no new recreational access should take place

Designated quiet areas where recreational access to the woodland will not be encouraged need to be shown on both the updated Recreational Access Plans and on a map in the LEMP, as maintaining quiet areas within the Ancient Woodland is essential to the success of the Biodiversity Mitigation & Compensation Strategy.

Appendix D

Concerns / feedback re Landscape and Ecology Management Plan

The key concerns on matters that need to be addressed are set out in Section 2.11 of this document. More detailed feedback on the LEMP are set out here.

7.1 Woodland / Wood Pasture Creation

P.Water has committed to relocating 80 trees from The Avenue. This is referenced as an objective in Section 7.1.1. However, the only reference I found was to relocating these trees was to the NE of the reservoir. P.Water have indicated they will also relocate some of these trees to enhance the SW wildlife corridor, but this is not referenced in the LEMP (see also comment below for Section 7.4.1).

Section 7.1.1 objectives refers to compensating for the loss of habitat connectivity and re-establishing corridors, but **no reference is made to bolstering the SW boundary to address gaps and improve connectivity of wildlife corridor**, nor is it shown on the maps. The location and width of the area in the SW adjacent to Winterslow Drive/ Well Meadow should be illustrated on the maps and described in the text (Section 2.11a in this document refers).

Reference also needs to be made to **bolstering the weak link in the eastern boundary wildlife corridor** as part of the detailed embankment and path design, a clear statement should be added to the LEMP to ensure that it does form part of the Principal Contractors design requirements (Section 2.11a in this document refers)

Section 7.1.2 refers to bolstering Staunton Country Park edge south of the reservoir and a thin red strip of 'scrub edge creation' is shown on Figure 4. Whereas the planning application Outline Masterplan which was approved by the LPA shows a new larger triangular block of woodland at this location south of Round Wood which is missing from the LEMP (see map extract in Section 2.11b of this document). The reduction in the area of woodland to be planted at the site is not acceptable, especially given the areas of Ancient Woodland to be lost. The LPA must ensure that the missing area of new woodland planting is included in the LEMP before any phase of development commences.

It is not clear in the LEMP when new on-site woodland areas are to be fenced and planted. The trees need to be planted as soon as possible to mitigate for woodland to be lost in winter 2022, and give trees the opportunity to establish before public access to the site resumes. The new triangle of woodland to be planted to the NW of The Avenue peninsula is also needed to screen the access to a wetland view point, in order to give time for the trees to grow before 2029 larger saplings needs to be planted in winter 2022/2023.

The text at Section 7.1.3 needs to be updated to reflect that the Phase 2 woodland planting blocks are only 'partially' protected by deer fencing, as the back of the blocks are not deer fenced.

Section 7.1.4 refers to the maintenance of trees to ensure establishment for the first 5 years. For the Phase 1 & 2 planting areas P.Water committed to the LPA when seeking approval for advanced planting to a maintenance period of 10 years to ensure establishment of these essential wildlife corridors. Given that appropriate management of the Phase 1 and 2 areas has not taken place over the past 2 years, as a minimum the 5 year annual maintenance period should commence now and continue to 2027. The text currently refers to 5 years from planting which would be c.2025, while the 5 year programme in App C of the LEMP shows ongoing management to 2027, so there is an inconsistency. The LPA should press for annual maintenance for 10 years, or as a minimum annual maintenance to 2027 (Section 2.11h in this document refers).

Section 7.15 and Appendix C-1 refer to maintenance activities that will be undertaken during the establishment period following planting. The activities proposed are not **appropriate for the Phase 1 & 2 advanced** planted areas. Given that this is a habitat in transition from grassland to woodland, with the transitional ruderal vegetation and developing bramble scrub providing an important wildlife corridor and habitat for birds, reptiles, small mammals and invertebrates during reservoir construction, more sensitive bespoke management is

needed for each planted block. Specific feedback on the management set out in Appendix C 5 year Work Programme follow;

- **1.02 Spot spraying** must only be of weeds causing a problem. These are grassland areas transitioning to woodland. The ruderal vegetation is part of the habitat in transition, in the interim it provides an important foraging and nesting habitat for birds, small mammals and especially reptiles and insects. It should not be removed unless it is genuinely impeding growth of young saplings. Certainly most of the saplings in the Phase 1 area at Gipsies Plain are taller than the surrounding vegetation and will not be hindered by it.
- **1.03 Control of all weeds within 750mm** of each tree is not appropriate in this habitat which is transitioning from grassland to woodland. The vegetation only needs to be cleared where it is higher than and swamping the smaller saplings. The grass / ruderal vegetation also protects the young saplings from the wind and sun, which in these exposed locations is a benefit, helping with moisture retention.
- **1.05 Mulch layer needed;** add text to confirm that when dead saplings are replaced a 500mm diameter mulch layer should be placed at the base of the tree to reduce regrowth of vegetation and help to hold moisture around the tree roots.
- **1.06, 2.03, 2.07 Removing shelters** should not be undertaken in June, when habitat disturbance should be kept to a minimum. Many of the shelters are within hedgerows where birds will be nesting. Shelter removal should take place in autumn/ winter to minimise disturbance to wildlife.
- **1.07 Cutting grass between planting twice a year** is not appropriate in this habitat transitioning from grassland to woodland (see 1.02 & 1.03 above)
- **Section 7.15 Coppicing in rotation from year 5** would not be appropriate for the new planting area as the trees are still establishing, this should be delayed to year 10 and more bespoke thinning/ haloing used to encourage standard trees to flourish would be more appropriate.

Note: The BBC Countryfile programme on 28/08/22 featured a new woodland area planted in 2022 on grassland which is managed by the Wildlife Trust. The officer speaking on behalf of the Wildlife Trust stressed the important function that the grass/ ruderal vegetation between the young saplings played in providing protection from the wind, drying out, plus the mulch creation their die back each year generates which in turn helps with water retention in the soil.

7.2 Hedgerow Creation/ Restoration

Section 7.2.2 locations should include the hedge being managed to prevent public access to the wetland along the NE boundary of the reservoir site.

Section 7.2.5 & Appendix C (2.03 & 2.08) refer to cutting hedgerows to 1200-1300mm in height every year in February. The hedgerow should be allowed to grow higher and establish at a minimum height of 1500mm, the height of the cut in the text needs to be adjusted. I note that Section 10 (page 89) refers in the work schedule to a height of 2m. This is too high to see over and therefore would adversely impact the landscape views from footpaths.

Specific feedback on the hedgerow management set out in the LEMP Appendix C 5 year Work Programme follow;

- 2.08 Proposed cutting a maximum of 50% of the hedge in one year. This conflicts with row 2.04 which indicated the hedge should be cut every year. Both cuts are shown in 2026 on the work programme. Presumably the 2.04 cut should not apply in 2026? As indicated above the minimum end height for the hedge after cutting should be 1500mm.
- 2.09 (Section 7.2.5) Encroachment of ruderal vegetation between the path edge and hedgerow happens very quickly reducing path width. Cutting it once every 2-3 years

will not be enough. Where hedges are alongside a path cutting of ruderal vegetation needs to take place twice a year to keep the path fully open. Cutting needs to take place outside the main breeding season e.g. late March/early April and mid August to September to control growth along footpaths.

- 2.11 Proposes hedge laying when regrowth reaches 4m height, but this height will never be reached if there is an annual cut as proposed in 2.04 & 2.08. Where hedge laying is proposed (e.g. the NE boundary hedge) then annual cutting needs to be reconsidered. Laying in 2023 is appropriate for the NE boundary willow hedge, but not for the new hedges around Gipsies Plain (Phase 1 advanced planting). The location column for hedge laying needs clarification.

7.3 Grassland Creation

There is no objective to maintain nesting and foraging opportunities for birds and reptiles in grassland, which there is for woodland habitats?

Of particular concern is the lack of reference to maintaining habitat for ground nesting birds such as skylark, which text earlier in the report indicated was a priority species. No mitigation for skylark habitat to be lost during construction is mentioned in the LEMP. The reduced provision described in Section 7.24 will not be adequate to off-set the lost territories. P.Water previously advised that a specific budget had been allocated for skylark mitigation work. Further detail should be provided, section 2.11I of this document refers.

Section 7.3.3 confirms species rich grassland diversity will be maintained and enhanced by grazing and/or cutting. However, there is no plan provided to indicate which areas it would be anticipated would be grazed, other than in 7.3.1 where it states the embankment will be grazed where appropriate. More clarity needs to be provided on where it is expected grazing will be practical with adequate stockproof fencing, for example, the NE grassland corner, the SW priority habitat (purple), Gipsies Plain wood pasture area, as well as the embankments. Along with areas where it will not be practical due to the requirements for public & dog access/recreation/ amenity space, for example, the NW grassland, along the southern operational access track/ bridleway and potentially Memory Park area (Phase 2 advanced planting) & butterfly meadow in the NW. Appendix C 24.02 indicated that the areas where grazing is not undertaken will be 'small', but based on previous discussions with HCC(SCP) staff I do not believe that this will be the case, quite large areas will need to be managed by cutting rather than grazing and that needs to be recognised now so that realistic management strategies are proposed.

In particular, it will not be practical to remove arisings from cutting operations given the size of the areas and volumes that will be generated. Section 7.3.3, 7.3.5, 7.24.4, Section 10 row 24, Appendix C rows 3.01 & 24.2 all refer. The stockpiles that would be needed on site would be enormous and grass cuttings break down very slowly, meaning piles would grow each year. Moving the grass generated off site would not be sustainable, unless you are able to hay cut in June/ July but the quality of the grass is not likely to be good enough for hay. The gradient of the embankment slopes prohibits use of hay cutting/ bailing machinery. An experienced contractor has previously confirmed to P.Water that it would not be practical/ safe for machinery to turn on the slopes.

Appendix C rows 3.02 & 24.03 refers to injurious weeds. This needs to be better defined. For example, ragwort is not an injurious weed where there is no horse grazing present on/ adjacent to the site, rather it is a good nectar source for insects.

Section 10 row 3 refers to setting the mower blades at 100mm. This will not be appropriate in amenity grassland areas such as close to the Visitor Centre. A separate method of grass maintenance will need to be specified along paths and in amenity grassland areas.

7.4 Scrub Edge Creation

Section 7.4.1, 7.4.5 refer to scrub along the SE boundary. I believe the willow scrub management being discussed in 7.4.1 is actually that along the NE boundary, and that also

applies to the text at 7.4.2 & 7.4.5. Amend the location to NE as shown for scrub edge creation on Figure A4.

Section 7.4.1 & Appendix C row 4.05 refer to providing a location for re-planted salvaged trees from felled wood. The location for this needs to be updated to reflect that P. Water have committed to relocating some of the salvaged trees to the SW boundary to bolster the boundary wildlife corridor.

Section 7.4.4 Targets – refers to ‘retaining’ habitat connectivity between Havant Thicket woodland and the hedgerow boundary east of the reservoir. Figure A4 does not show the new scrub edge restoring connectivity to the Phase 1 planting area in the east. Specific reference needs to be made in the LEMP to **bolstering the weak link in the eastern boundary wildlife corridor** as part of the detailed embankment and path design, a clear statement should be added to ensure that it does form part of the Principal Contractors design requirements (Section 2.11a in this document refers).

Section 7.4.5 makes no reference to planting any scrub or tree species in the new scrub creation areas? While natural regeneration can form part of the strategy, to ensure species diversity and that the scrub establishes quickly into a useful habitat, some planting will be necessary and this should be stated in the LEMP.

It is not clear in the LEMP when the new scrub creation areas will be fenced off and planted. This needs to happen as soon as possible to mitigate for woodland and scrub habitats to be lost in winter 2022, and give trees the opportunity to establish before public access to the site resumes.

Appendix C, row 4.01 proposes scrub edge management every 4-5 years, then shows annual blocks during the first 5 years. If this relates to the new scrub creation areas then cutting 20-25% of new growth in the first 5 years of establishment is likely to be too much too soon, especially where an element of natural regeneration is being relied upon. Text & table blocks needs to be updated to propose scrub management is delayed for at least 3 years then reviewed by a competent person to see if any intervention is needed in year 4 & 5, for example, to control dominant uniform growth of one species such as willow or blackthorn. Full rotational scrub management is not likely to be necessary until year 6 at the earliest. Section 10 row 4 also needs to be updated to reflect this.

The specification for scrub edge creation in Appendix B6 refers to removal of the existing fence prior to hedgerow laying. The fence must not be removed until a new deer or stockmesh fence has been constructed along the edge of the new scrub habitat to be created to the south. This will be much more than the minimum distance of 1.2m currently referred to in the specification text, as the minimum width of the new scrub is specified in the LEMP as 4m.

The specification for scrub edge creation in Appendix B6 refers to removal and stump treatment of elder plants. If elder is present it is not dominant, nor a problem, in this willow dominated edge. Elder can be very beneficial for wildlife as it produces blossom and fruit. Any elder present can be coppiced, it is not necessary to apply stump treatment.

Deer browsing is a significant issue at the site, which will get worse when the existing woodland is removed in 2022. Coppiced stools will need to be protected by the placement of brash over the stools, this should be made clear in the Appendix B6 specification.

7.5 Fencing and gates

Section 7.5.4 only prescribes deer fencing around the conifer clear fell compartments and around retained woodland where required. Deer fencing will need to be provided around new planting areas including Round Wood, SW boundary connectivity enhancement, south of Round Wood, new triangle NW of the tip of The Avenue peninsula, and around scrub creation areas. This requirement is not described in Section 7.5.2, nor shown on Figure A5. Section 7.5.4 & Appendix C row 5.01/5.02 refers to maintaining fencing in good condition. This is essential to prevent motorcycle access, deer access, or human/ dog access to ecological sensitive areas and to keep grazing animals in. The LEMP text currently refers to repairs to fencing being carried out annually, or as required. I note that one day monthly is allocated to inspection, but maintenance is shown in one block each year in February. This

is not appropriate, it will be essential that damaged fences are repaired immediately to prevent animals getting out and the public/dogs getting in. The text needs to be updated. Section 10, row 5 also needs to be updated.

The fencing required for the northern access road needs to be shown on the General Arrangement and Landscape Drawings submitted with the reserved matters planning application. As a minimum an indicative location needs to be shown along with details regarding the quality of the fence to protect the Ancient Woodland from public/ dog and motorcycle access.

Figure A5 is provided to show the location of proposed fences and gates. However, not all necessary fences and gates are shown. **Figure A5 needs to be updated to show stockproof fences or deer fences as appropriate;**

- Along the eastern boundary linking the embankment fence to the fence shown along the NE reservoir boundary to keep stock in and people/ dogs out of the NE grassland area from the eastern perimeter path.
- Around all of the pond enhancement areas. As was discussed at the Env. Sub Group site visit dead hedges alone will not be adequate to keep dogs and people out of the ponds, especially as dogs are used to being able to enter these ponds, and dead hedges will degrade with time/ access. At the site visit FE indicated a stock fence and dead hedge to provide landscape screening would be needed. At present only a dead hedge is shown on Figure A6 around pond enhancement areas. Section 7.13.1, page 55 text of the LEMP confirms both a dead hedge and fencing should be utilised.
- On the woodland edge of reach 1 and 2 where top water level stream incursions are shown to stop access to the woodland/ wetland in the south, and along the stream corridor to the north.
- There is gated access to the ride south of the Category A FE track down to a wetland viewpoint. A fence will need to be provided between the NE boundary fence at the west end, north up to the gate on the Cat A track to prevent access to the wetland via the woodland from this ride.
- Fencing and gates needs to allow a route for animals to get from Gipsies Plain to graze the NE grassland area of the reservoir site, as grazing would be the optimum habitat management for this grassland area. The NE grassland needs to be securely fenced for grazing.
- Gates need to be provided to allow grazing animals to moved around the site. For example, to allow sheep onto the embankment, and between paddocks on the embankment. It is likely that additional fencing to that shown on Figure A5 will be needed to allow safe contained grazing away from dogs in the NE grassland and around the priority grassland habitat in the SW.

The fence line currently shown on the water's edge at the west end of the wetland on Figure A5 will need to be set back at least 25m from the wetland edge to help protect the wetland from public disturbance and give space for a planted tree screen.

7.6 Dead Hedging

Section 7.6.1 refers to dead hedges being used to prevent unwanted access and deter the public from sensitive areas. A dead hedge is a bit of deterrent but is not substantial enough to protect access to key sensitive areas such as the pond enhancement areas, as it degrades and can be trampled too easily. In such locations a stockmesh fence and dead hedge would be needed, as previously recommended by Forestry England.

Section 7.6.2 refers to dead hedges being shown on Figure 7. Additional dead hedges will be needed to discourage access;

- Dead hedges will be required on both sides of the gravel tracks at stream crossings. Currently only shown on the north side of the existing Category A FE track.
- Where rides/ paths cross the stream corridors dead hedges will be needed on both sides. A dead hedge is not currently shown at the reach 1 and 2 stream ride crossings. This will be essential as the paths within these rides is to be upgraded for more public access.
- Dead hedging and a fence will be needed around the Bells Copse pond enhancement area, which is not currently shown on Figure A6. Section 7.13.1, page 55 text of the LEMP confirms both a dead hedge and fencing should be utilised.

Section 7.6.4 refers to the dead hedge being continuous and unbroken where possible. It is not shown as continuous along the NW boundary of the northern access road. For example, the dead hedge line is not present behind some of the passing places. It should be possible to provide a continuous dead hedge along the NW boundary.

Section 7.6.4 should refer to using dead hedges to discourage public access to stream corridors.

Section 7.6.6 & Appendix C row 6.06 refer to monitoring dead hedges annually. Monitoring and repair will need to be much more regular where the dead hedge is providing a security function to discourage public access (e.g. to stream corridors and racks).

7.8 Wetland / Wet Woodland Creation

The biodiversity net gain of the new retained wetland was to be optimised by an operating regime that would ensure there were **annual seasonally fluctuating water levels in the wetland**. This was confirmed in the Atkins Technical Note, Wetland Concept and Outline Design, document reference: HTR-ATK-XX-ZZ-RP-Z-0001. The page 35 LEMP text confirms that the “Wetland water levels will naturally fluctuate “, yet the text in the LEMP at page 50 & 91 no longer seems to commit to delivering seasonally fluctuating water levels in the wetland. Instead, I am concerned that page 50 (7.8.1 & 7.8.3) seems to suggest water levels will now only naturally fluctuate when the main reservoir level is low (i.e. during drawdown). If the operating regime for the reservoir does not allow seasonally fluctuating water levels in the wetland, which in turn annually expose emergent islands for breeding birds and muddy edges for migrating waders (as set out in the April 2020 Technical Note e.g. Table 4.1 row 1, page 22 and Figure 3.9) then the expected biodiversity benefit from the wetland will not be delivered. The LPA should ensure that Section 7.8 of the LEMP is updated to refer to the retained wetland delivering seasonally fluctuating water levels and emergent islands.

Section 7.8.4 text refers to the wetland having consistent water levels which is incorrect. Page 35 confirms that the “Wetland water levels will naturally fluctuate.” The text at 7.8.4 and Section 10 row 8 (column 3 & 5) needs to be updated.

Figure A3 & A4 shows the retained wetland hatched in blue, with the key indicating that this is the ‘Wetland Area’ or ‘Wetland Management Area’. However, the wetland area included in 10.2 ha to be created includes the northern shore of the reservoir east of the retaining structure which is also to be managed as part of the wetland conservation area (wet grassland and ephemeral shallows). Figure A4 should show the blue hatched area as the retained wetland, but also illustrate the full extent of the wetland conservation area/ wetland management area.

In Section 7.8.1 the text should refer to the wetland being fed by ephemeral or seasonal headwater streams, as the streams are dry from November to May each year.

Figure A4 needs to show a good width tree screen planted at the western end of the retained wetland to protect the sensitive wetland habitats from disturbance associated with the visitor hub, as well as to screen the access to the proposed education hide. This is essential to allow the wetland to full fill its biodiversity potential and deliver a net gain.

7.9 Shoreline Habitat Creation

The optimum habitat management for the NE grassland area would be grazing. No reference is made to grazing. This should be the preferred management for this grassland area and access for grazing animals needs to be possible between Gipsies Plain and the NE grassland.

7.10 Pond Maintenance (Gipsies Plain)

Section 7.10.1 refers to adding a new culvert beneath the right of way. There is no need for this as there is already a pipe running from the ditch in the north to the ditch in the south shown as line A to B on Figure B3 in the LEMP. It is the new watercourse D to F that requires a new culvert below the right of way. The text in Section 7.10.1 should refer to cutting into the existing concrete surface water pipe adjacent to each pond to create an in plus out connection to provide an additional source of water to fill the ponds. Section 10 row 10 also needs to be updated.

Section 7.10.3, paragraph 2 should refer to a new pipe connecting the ponds to the existing surface water pipe, not a new culvert.

Section 7.10.5 refers to the outline design being shown on Figure B3. However, the outline design is missing from Figure B3, which just show the location of the existing surface water pipe. The design needs to show an in and a high level out connection to the existing surface water pipe, unless some form of special valve is to be used to allow the right amount of water in to top up each pond, without the ponds overflowing.

Willow growth is already an issue in the ponds. An action needs to be added for regular removal of willow growth from the ponds. This should be added to the prescriptions in Section 7.10.5 and Section 10 row 10.

7.11 New Water Course (Gipsies Plain)

Section 7.11.1 & 7.11.5 needs to have the objective and prescription added to create a new culvert underneath the right of way (see text in 7.10.1)

Section 7.11.5 refers to the outline design being shown on Figure B3. However, the outline design is missing from Figure B3, which just show the location of the proposed new channel.

7.12 Reservoir Compensation Flow Channel (Reach 8)

The original Outline Masterplan (HTR-ATK-ZZ-ZZ-DR-L-0001) for the reservoir approved by the LPAs included the **location of a compensation channel water course** from the control house to the Riders Lane Stream, remaining wholly within the red line, in the SW of the site (circled in black on the map extract in Section 2.11c of this document). Figure A6 in the LEMP now shows the proposed new channel realigned and joining the stream further south in an off-site location beyond the red line boundary. This is completely inappropriate. The new channel will be designed to take large volumes of emergency drawdown water which will involve the need for very robust engineering of the headworks and channel where it joins the Riders Lane Stream. The construction of the channel and associated structures will have a significant adverse impact on the existing mature off-site oak woodland, including at least one veteran oak tree. It will also adversely impact the access route for grazing animals

needed for grassland management, and the new proposed access route to the embankment. The location is in an area where an existing path crosses the stream, where there are problems with anti-social behaviour, including fly tipping. The revised location for the reservoir compensation channel is not appropriate and the LPA should ask for Figure A6 in the LEMP to be revised to confirm the channel will terminate within the P.Water land holding and red line boundary further to the north.

The design of the new compensation flow channel needs to be environmentally led and be located so as not to impact the mature off-site woodland. Locating the whole of the channel on site would give the opportunity;

- to allow water from the channel to wet more of the target area for priority habitat creation (Rush Pasture Enhancement)
- for more of the onsite channel to retain water for longer

7.13 Pond Enhancement

Section 7.13.2 makes reference to a pond enhancement within the willow stand in the NE area of Bells Copse, but this is not shown on Figure A6. The pond enhancement area should be added to Figure A6. As pond enhancements do not just apply to Reach 4 only this should be removed from the title of Section 7.13.

Section 7.13.1 & 7.13.4 should refer to enhancements for the benefit of reptiles, not just great crested newts. The FE ecologist previously proposed creating reptile hibernacula around the ponds with material generated from pond enhancements and tree thinning activities around the ponds. This is no longer mentioned and should be added to the LEMP as an enhancement.

The FE ecologist previously proposed minor reprofiling of the undulating ground forming the ponds to help the ponds hold more water and for longer. This is no longer mentioned and should be added to the LEMP as part of the pond enhancement proposals.

Section 7.13.4 proposed a new dog-dipping pond close to the FE car park. It is unclear as to what will be the source of water to keep the new pond topped up throughout the year, so that it can provide its intended function?

Section 7.13.5 & Appendix C row 13.03 refer to mechanical removal of leaf litter in FE pond enhancement areas, which is proposed in January 2023 when the pond is wet. It would be better to carry out this work when the pond is dry in September / October 2022. Great crested newts are still active at this time and will not be using the ponds for breeding. There is also ample adjacent habitat so that if they were present they could readily move.

Appendix C row 13.07 refers to installing dead hedging and/or fencing around pond complexes. Section 7.13.1, page 55 text of the LEMP confirms both a dead hedge and fencing should be utilised to control access by the public and dogs, which will in turn help reduce the risk of spreading invasive species.

7.14 Headwater Stream Restoration

In Section 7.14.3 there is no reference to the need to retain trees at the north and south end of clearings where the streams cross rides / paths, so that the clearings are not visible/ obvious from the paths. A minimum of a 10m belt of trees should be retained adjacent to rides/ paths, in addition to provision of dead hedges made from the cuttings. Some dead hedges are shown on Figure A6 but not enough. As stated in comments made on Section 7.6 where rides/ paths cross the stream corridors dead hedges will be needed on both sides. A dead hedge is not

currently shown at the reach 1 and 2 stream ride crossings. This will be essential as the path within these main rides is to be upgraded for more public access.

7.15 Aquatic Plant Translocations

Section 7.15.5 refers to a Technical Note in Appendix B5 providing most of the details. This note was not provided with the report.

7.17 Inns Biosecurity plan

In addition to removing non-native aquatic species the LEMP text at page 37 and 61 should be updated to confirm that terrestrial non-native species such as lauryl, rhododendron and Turkey oak will also be removed.

7.18 Conifer Clear Fell & Replanting

Appendix C row 18.7 - Growth of non-native species where conifers have been removed will be a problem due to the species previously present, especially Western cedar which regenerates prolifically. Specific action needs to be included annually in the maintenance plan to control regrowth in the first five years, which otherwise will quickly dominate, shading out any new deciduous planting. Page 63 confirmed that this management will be needed for 10 years following felling. The requirement to control conifer regeneration is also confirmed on page 93 of the LEMP and this needs to be added as a specific action to Appendix C for a 10 year period.

7.19 Birch clearings and Replanting

Creation of racks in birch dominated compartments is a key aspect of the mitigation/compensation strategy for loss of woodland habitats on site. The woodland on site is to be cleared in 2022, so the racking and haloing around deciduous trees in the birch blocks needs to be progressed as soon as possible within the limits of felling licence restrictions. The specification for birch racks is helpfully described in more detail in Appendix B6, where a table provides a proposed timing for racking. It suggests that no work is planned in 2025, 2026, 2028, nor 2029, with 2 compartments left until 2030. The programme for birch racking is not ambitious enough to deliver mitigation and compensation measures in a timely way following loss of habitat.

A number of areas of birch racking/ haloing are not now shown on the maps provided with the LEMP, the compartments were included on the previous draft LEMP map (Figure A3). But Figure A7 only now shows areas of birch clearings and replanting. Birch compensation areas which are not currently shown include 6507A & E, plus radiating racks from forest glades in 6502A and 6508. These areas are also not in the 5 year work plan in Appendix C (19). These birch compartments were previously shown as compensation/ mitigation areas on the Outline Mitigation & Compensation Strategy submitted and approved with the original reservoir planning application. They are shown on Figure E3 submitted to Natural England with the Bat Habitat Management & Maintenance Plan, which supported the EPS Bat Licence Application. It is essential that the birch racking/ haloing in these compartments is included in the LEMP text in Section 7.19, on page 94 (19), Appendix C (19) and on Figure A7, as committed to at the time of the original reservoir planning application.

Appendix B6 specification text, last bullet, refers to cutting racks at angles to end at the nearest track or ride. This is not appropriate. Racks need to terminate at least 10m before they reach a ride/ track, ending in a dead hedge, leaving at least 10m of tree cover to screen the presence

of the rack from the public and reduce the risk of new dog walking desire lines along the racks. This is essential to protect the biodiversity value of the racks. The dead hedging is mentioned in the text of the 5 year work programme (Appendix C, row 19.05), on page 91 (row 1) and page 94 (row 19). The 10m tree retention inset and provision of dead hedges at rack ends needs to be added to the specification for birch racks in Appendix B6. The 10m tree buffer also needs to be added to Section 7.19.5

7.20 Ride Management

Figure A7 shows provisional locations for scalloped edges. No provision is made for scalloped edges along the SE side of the northern access road. There is an opportunity to create more micro habitats with different climates to enhance biodiversity by cutting some scalloped edges into the birch compartments along the road side. This would also allow more light to reach the north side of the track where there is a valuable mature tree line and bank habitat, and this would benefit biodiversity. Some scalloped edges should be added along the northern access road to Figure A7.

Figure A7 shows locations for junction enhancements. Junction enhancements should be shown where the diagonal yellow ride joins the northern access road and Category A gravel track (elsewhere in the document called The Avenue path)

North of Bells Copse a yellow ride is shown connecting to the northern access road. The 2 zone ride management should cease before it joins with the access road, so that the ride is not obvious from the road, as this is not to be a visitor route.

Where rides join the main surfaced visitor routes the 2 or 3 zone management should end before the junction, so the ride does not look so wide/ attractive to visitors to explore. To minimise the impact on the Havant Thicket woodland and protect the biodiversity the northern area of the wood is to be kept as quiet as possible. The way ride junctions are managed and the lack of path surfacing can all help to encourage the majority of visitors to stay on the visitor trails. The areas where recreational access / pressure should be minimised and the woodland kept quiet are shown on the Env. Sub Group map in Appendix C of this document.

Appendix C row 20.01 refers to collecting arisings from ride management. Given the length/ area of rides and the volume of arisings that would be generated from mowing operations collecting the arisings is unlikely to be practical (see also Section 10, page 94, row 20)

Appendix C row 20.02 if zone 2 of rides are to be cut by hand (rather than flail) cuttings could beneficially be used to form dead hedges at the woodland edge to help restrict public/ dog access in newly cut areas, rather than compost or burnt as indicated.

7.21 Woodland Management

Section 7.21.5 should cross reference to the 'Outline proposal for management of retained woodland' which is included in Appendix B6 of the LEMP.

Section 10, row 21, is indicated to apply to the management of Round Wood, stating that management will not commence for 10 years. This contradicts Appendix C row 21B. As indicated in the Appendix B6 specification the retained section of Round Wood needs bespoke management to let in more light and to create an understory and field layer. The thinning, ring barking, and planting activities proposed need to be completed as soon as possible as part of the mitigation/ compensation for loss of woodland at the site which will take place in 2022. This requires specific text for the management of Round Wood to be added to Section 7.21, Section 10 row 21 and the 5 year work programme in Appendix C of the LEMP.

The enhancement of the remaining fragment of Round Wood (Ancient Woodland) should be a priority. A deer fence should be provided urgently and actions taken as soon as possible to ensure the development of an understorey and field layer of vegetation, as set out in the LEMP Appendix B6 specification text. Currently no date has been proposed for this work in the LEMP work programme, Appendix C row 21B only indicated that the management of Round Wood would commence within 5 years. The LPA should press for the woodland management work and new tree planting needed in Round Wood to be completed in 2023, especially as this is the only fragment of Semi-Natural Ancient Woodland to remain.

Appendix C row 21B – It is not clear that the management of the other retained woodlands (Cabbagefield Row, Swanmore Road shelterbelt, south of The Avenue) will not be started for 10 years, until after reservoir construction is complete. Instead it refers to TBC. Section 10, page 95, row 4 confirms management will be from year 10 onwards. The text in Appendix B6 on the retained woodland confirms these areas will not be actively managed until after the reservoir construction is complete. This in line with previous advice provided by Natural England indicating these retained woodlands should be left undisturbed. The text in Appendix C needs to be updated to confirm the 10 year delay to woodland management in the retained woodlands, excluding the Round Wood fragment.

7.22 Forest Glades

There is no reference to racks cut to radiate out from Forest Glades in Section 7.22 or 10 row 19. There should be a cross reference to the Section 7.19 text describing the sun dial formation to allow more light to enter the racks from the clearings and encouraging the dispersal of wildlife within the woodland.

Appendix C row 22.03 – Cutting Forest Glades every 2 years gives a 10 year cycle as there are 5 glades at each location. This is too long to achieve the management objectives. Appendix C needs to be updated to be in line with Page 95, row 22, with one glade cut at each location every year to give a 5 year cutting rotation in all Forest Glades.

Section 7.22.3 refers to Forest Meadows instead of Forest Glades.

Section 7.22.5, paragraph 4 should refer to year 6, not 11 (see table 7.6)

Section 7.22.5 – add that cuttings should be used to create dead hedges.

Page 95, row 22, sub-row 3, column 7, timescales should refer to cuts every year, not 2 years, as per prescription on page 71.

Page 95, row 22, sub-row 7 refers to mechanically treating bracken by cutting or rolling. Whereas the specification in Appendix B6 states; do not mechanically treat bracken, spot spray or weed wipe. Forestry England should confirm the preferred method of bracken treatment for including in both parts of the LEMP.

7.23 Scrub Mosaic Management (along wayleave)

Section 7.23.5 and Appendix C row 23.03 - Scrub clearance at the Bells Copse wayleave refer to burning or composting arisings. It would be better to use the material to create dead hedges around the woodland edge to restrict access and create useful habitat if these areas are to be hand cut, rather than flailed.

7.24 Grassland Enhancement

Section 7.24.1 refers to management of retained grassland providing suitable habitat for skylarks. No mitigation for skylark habitat to be lost during construction is mentioned in the LEMP. The reduced area of grassland post construction will not adequately compensate for lost territories, especially given the increased level of disturbance from higher visitor numbers. P. Water previously advised that a specific budget had been allocated for skylark mitigation work, which presumably would be offsite, so it is important to understand what are they proposing and when? The work needs to be agreed and implemented before next year's 2023 breeding season starts and reservoir construction is underway. *Note: The off-site grant scheme proposed is not due to commence until 2030, so that will not be providing any short term mitigation/ compensation.*

Page 76, paragraph 1, refers to providing a variety of sward heights for the benefit of skylark and meadow pipit by grazing compartments on rotation. How will this be achieved if / where grazing cannot be delivered?

Section 7.24.3 refers to grassland being managed in the long-term 'as much as possible' by grazing. This is too vague, a map needs to be provided to show where it is anticipated it will be practical to use grazing, so that needs for fencing and access can be considered. This will also enable consideration as to the adequacy of the alternatives, where grazing is not possible.

Section 7.24.4 & 7.24.5 refers to collection and removal of grass cuttings, as indicated in the feedback for Section 7.3, given the volumes involved this is highly unlikely to be practical (see comments on Section 7.3)

7.25 Rush Pasture Enhancement

Section 7.25.1 sets the objectives. It is important that an objective is added to require protection of the small area of existing priority habitat along the stream in the SW, so that this is available to seed and spread out into the newly wetted areas once construction is complete. An objective should be added to fence off and protect the priority habitat during construction.

Fencing the existing priority habitat during construction should also be added to the prescription text in Section 7.25.5. The rough area is shown on Map C9 in the ECOSA Vegetation Assessment submitted with the planning application. The botanist who mapped the original area of the priority habitat should be asked to revisit and peg out what he considers the area to be protected during construction should be in order to minimise the impact. This requirement should also be set out in the CEMP.

Section 7.25.3 refers to enhancing the existing neutral grassland habitat through supply of overflow water from the reservoir system. In addition to overflow water additional wetting can be achieved;

- through diversion of the drainage from the embankment toe drain,
- plus from the compensation flow channel (this should provide water for more of the year)

7.26 Reptile and Amphibian translocation

Appendix C row 26.01 Reptile and amphibian re-location is indicated to be in year 1 and 2 with only April to June 2022 highlighted. The amphibian translocation from Upper Lake has not taken place in 2022. It needs to be completed at an appropriate time of year in 2023, before it is too late.

Section 7.26.3 should also refer to additional hibernacula being provided around enhanced ponds in Havant Thicket and Bells Copse, as well as at the Gipsies Plain advanced planting area.

Detail is indicated to be provided in the CEMP, but the CEMP has not been provided. Nor has the Reptile Mitigation Strategy.

7.28 Viewing Points

Section 7.28.5 prescriptions should refer to dedicated gated and stockmesh fenced paths being provided to view points on the wetland edge to reduce the potential for disturbance. Plus confirm that dogs will not be permitted along these view point access paths.

To prevent disturbance from public access view point and the education hide will need to have a screened approach. The planting which will provide that screening needs time to establish. Any planting that is required to screen view points and the education hide need to be identified now as part of the LEMP and the planting should be added to the programme for completion as soon as possible.

Figure A4 does not currently illustrate any tree planting along the wetland edge close to the education hide at the western end of the retained wetland. Tree planting will be necessary to screen the wetland from the main visitor hub and path to the education hide. As this is critical to minimising disturbance of the wetland the planting should be included on the LEMP map and in the programme.

The fence line currently shown on the waters edge at the west end of the wetland on Figure A5 will need to be set back at least 25m from the wetland edge to help protect the wetland and the newly planted tree screen from public access.

Consideration should be given to using fossiliferous limestone which will be excavated from the borrow pits in the construction of view points, for example, as dry stone walls. This will provide a robust natural solution from the material to be excavated, making this a very practical and sustainable solution.

Miscellaneous other points

The following projects have previously been discussed with stakeholders but are not currently included in the LEMP.

- a) Working with the Local Authority responsible for street lighting to reduce the light intrusion into the site.
- b) A pond enhancement to remove non-native species and improve light to the brickworks pond on HCC land to the SE of the reservoir site.
- c) Planting to screen the southern access road from views across the reservoir and improve habitat connectivity in the west.
- d) Acorn rescue from The Avenue before the trees are felled in 2022 (potentially giving the acorns to local schools to grow and then use in mitigation/ compensation planting)
- e) Rescuing honeysuckle plants from The Avenue and planting them in the Phase 1 and 2 advanced planting areas.

The maintenance of ditches at the site (including along the northern access road) and water course management are not included in the LEMP text, nor in the Appendix C work programme.

The LEMP and Detailed Biodiversity Mitigation and Compensation documents should be listed in the schedule of drawings supporting the reserved matters planning application, and in any consent granted.