

Subject:

HTR Discharge of Planning Conditions 5,12 and 20. Ref. App/20/00990.

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Havant Thicket Reservoir. Ref. APP/20/00990.
Discharge of Planning Conditions 5,12 and 20.

Comment on behalf of Havant Climate Alliance and Havant Friends of the Earth.

We have objections to the plan for 40 caravans and 10 bunkabins to be sited in the north-west compound of the reservoir site. These will provide accommodation for up to 50 workers and will remain in place for 4 years until 2027. (At peak times there will be 180 workers with 120 of them local) It is said the caravans will mainly be occupied March to October, Sunday nights to Saturday lunchtimes. However with 50 workers from North Wales and the North West, it is likely that the majority of caravans will be occupied through the weekends.

Our main objection is that the block of caravans are too close to the ancient Havant Thicket woodland where there are many sensitive species including rare species of bats. They will be very vulnerable to disturbance, especially to noise and light at night. 10 metres from the woodland edge is too narrow an ecological buffer, e.g. Bechstein and Myotis bats are known to avoid lit up areas by up to 25 metres. Less than this will reduce the area available to them for foraging and commuting. As a minimum, the gap could be increased by removing the northern most row of caravans or moving them southwards within the compound.

The original Hybrid Planning Application did not cover workers living on site or the night time use of the Northern Access road. An Ecological Impact Assessment is needed to look at the potential harmful effects of noise and light disturbance on nocturnal protected species known to be in the adjacent woodland, such as glow-worms, owls, dormice, nightjar, badgers and bats. The EIA is needed before planning conditions 5,12 and 20 are discharged. This should also be subject to a decision by the Planning Committee.

Condition 5, Construction and Environmental Management Plan.

Code of Conduct says that workers should not make unreasonable noise, particularly between 11pm and 7 am. This refers to possible impact on human neighbours of the site and does not refer to potential effects on nocturnal wildlife. Noise restrictions should apply from dusk to dawn, with time restrictions changing each month according to daylight hours.

There needs to be a comprehensive Code of Conduct in place, covering all environmental risks, with nightly/daily enforcement. There may be limits to enforcement, as workers' rights and well being must also be considered.

An alternative would be consider an offsite solution for workers' accommodation, but this would be less economical for the Contractors.

Work on the Reservoir is expected to be noisy which will also effect wildlife. Working hours could have varied start and finish times, according to daylight hours e.g. March, April and October 8 am – 6 pm, with 7 am – 7 pm (as requested by Future Water) May – September. There could be leeway for working additional daylight hours during the summer.

Condition 12. Construction Traffic Management Plan

It is acceptable that construction traffic must use the Northern Access Road and avoid the B2149 via Rowlands Castle. Manned Control Point at the junction of the NAR and B2149. Wheelwashing facilities and sweeper available.

Our area of concern will be how often the Northern Access Road is used by workers' private vehicles, after dark. The estimate of 6 movements per week, per caravan = 300 vehicle movements per week, seems over optimistic. There are many reasons that a worker might choose to go off site after work, probably after dark. This will pose a risk to nocturnal wildlife which are unfamiliar with road traffic. Various mitigations to reduce risks e.g. low speed limit, minibus trips to the shops, making bicycles available, are suggested. It is not known how effective this will be. Earlier construction phases indicated workers regularly going out into the community. An after dark curfew, except for emergencies, could be imposed, needing effective means of enforcement. However this may conflict with the need to provide good conditions for workers, so would need careful consideration.

Condition 20. Lighting Strategy

Most work can be undertaken entirely in daylight, and this could be further enabled by adjusting work times month by month as suggested under Condition 5. Failing this there would need to be early/late working exclusion buffer zones around sensitive ecological receptors.

Limited 24 hour lighting will be needed for certain operations such as pouring concrete.

Year round lighting will be needed for the site Compound and Offices. Although there is detailed lighting advice including a "Bats and Artificial Lighting" note, it is not clear whether red spectrum lights are proposed wherever possible in order to reduce impact on bats and other nocturnal species. UV light must also be avoided. Lighting controls should default to motion sensors. There should be heavy duty blinds/shutters on caravan and office windows to prevent light spill. However this will need to be enforced to be effective.

Mitigation

To offset negative impacts of 4 years of disruption to wildlife close to the Compound, some mitigation will be needed in the form of buffer habitat. Additional tree planting along the Northern Access Road has been suggested, plus planting on the west side of the Wetland to create more of a tree screen.

Habitat Regulations Assessment

This was based on the original hybrid application which expected only day time working. It did not include Workers' Accommodation and the effects of noise and light on European Protected Species. It is inadequate in that it referenced rare bats coming to the area from the Singleton and Cocking Tunnels, but failed to recognise that there are bats roosting and foraging in the area round the Reservoir site. A new HRA is needed plus an Ecological Impact Assessment in relation to this. Further discussions with Stakeholders are also needed, before the above Conditions are presented to the HBC Planning Committee for discharge.

Regards

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