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Email: _____
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Our Ref: _____
JTM/1856/AT/L/20261005
Your Ref: _____
APP/26/00561
Project No: _____
JTM/1856

Dear Mr Lakhan

Application Reference – APP/26/00561

Application for approval of all Reserved Matters (siting, scale, external appearance & landscaping) related to Phase 6 Forestry England Track Raising

Response to Representation

We have noted that a representation has been made on behalf of Havant Climate Alliance and Havant Friends of the Earth on the Reserved Matters Application. We have therefore set out in the table below responses to the comments to aid the timely determination of the application.

Representation Comments	Response
<u>Embankment Slopes</u> These appear wider than the area that was originally marked out in 2022, especially for the Eastern Embankment. At that time the southern edge of the Eastern Embankment was 15 m wide whereas it now appears to be 20 m. We wonder whether there is potential to make the slopes steeper to further reduce the number of trees that need to be removed, especially at the most southern and most northern points of the Eastern Embankment. Reducing the footprint of the embankment would require less material and be cheaper to construct.	<p>The embankments are required to support the Forestry England track and provide the necessary structural stability for the track to be used by Forestry England's timber lorries. As a result, both the footprint and the angle of the slopes are dictated by engineering, safety and long-term stability requirements. The design has, however, been refined where practicable to minimise impacts on woodland habitat. In particular, the eastern embankment design is anticipated to reduce woodland canopy loss by approximately 20% compared with outline proposals, while the revised western embankment design reduces the number of trees requiring removal by 33 trees.</p> <p>Visually, the embankments are consistent with the wetland embankments approved as part of the Phase 2 Reserved Matters application. As with the main wetland embankments, they will be largely submerged beneath water level, enabling them to blend into the natural environment.</p>
Do the outlines of the embankments shown,	The application drawings show the permanent western and

Representation Comments	Response
<p>include the extra area needed for excavations, foundations, drainage and construction of the embankment toe?</p>	<p>eastern embankment footprints, and culvert arrangements, following completion of the works.</p> <p>Temporary construction requirements, including working room for embankment construction, culvert installation and activities around the embankment toe, are considered separately within the Arboricultural and Silvicultural Appraisal and Tree Protection Statement. This document sets out the proposed tree protection methodology and associated working room requirements during construction.</p> <p>As shown on the Tree Protection Plans included within the document, braced Heras fencing is proposed with a small set back from each embankment toe, providing sufficient space for construction activities and safe access around the embankments whilst protecting retained trees. This approach ensures that the necessary construction activities can be undertaken while maximising the retention and protection of existing trees adjacent to the embankment.</p>
<p><u>Trees</u></p> <p>We accept that Norway Spruce and Corsican Pine have to be felled, for reasons of disease and to provide commercial timber. Apart from this we think deciduous trees should remain between the FE Track and the Reservoir Wetland, to reduce disturbance to Wetland birds from people, children, dogs and FE vehicles. Natural England and the HTR Wetland Specialist Sub-group 2019/20 specifically requested that trees should be left standing in flooded valleys to create a diverse habitat above and below water.</p> <ol style="list-style-type: none"> Near the Western Embankment we are pleased that there has been a reduction in the number of deciduous trees previously proposed to be removed (17 instead of 50). We think that trees, especially more mature specimens, should remain in areas to be flooded, where they can decline slowly and provide standing deadwood to maximise their value to biodiversity. Near the Eastern Embankment, we do not agree that there should be extensive crowning and coronet cutting of larger trees south of the Track. This should be limited to trees close to the Track where safety is an issue as they decline. Even here it may be possible to make them safe just by removing some branches. Elsewhere, large deciduous trees should be left intact to slowly decline. While a coronet cut will increase fracturing to provide habitat for insects, it would reduce the habitat value for other species such as birds, 	<p>In response to stakeholder feedback, proposals have sought to maximise tree retention wherever practicable, maintaining woodland screening, habitat connectivity and opportunities for the development of standing deadwood habitat. As detailed on the Tree Location Plans within the submitted Arboricultural and Silvicultural Appraisal and Tree Protection Statement, no trees are proposed for removal within areas to be flooded unless they are located within the embankment footprint or form part of Forestry England's commercial felling operations. In cases where trees are located within the embankment footprint, removal or coppicing is necessary to facilitate construction and ensure the long-term stability and integrity of the embankment.</p> <p>Across the application, trees exceeding 300mm in diameter have been prioritised for retention, with the majority retained rather than removed, as set out in Table 2 of the Arboricultural and Silvicultural Appraisal and Tree Protection Statement. Within the eastern embankment area specifically, 262 trees are proposed to be retained, many of which are anticipated to subsequently contribute to the creation of valuable standing deadwood habitat.</p> <p>With regard to comments on coronet cutting, only one tree south of the Forestry England track is proposed to be managed in this way (with the other three being north of the track). This tree is located in close proximity to the existing track and has been identified as presenting an unacceptable future safety risk to track users and members of the public due to its anticipated decline following reservoir filling. Coronet cutting is therefore proposed to retain its habitat value while managing this risk.</p> <p>No crown lifting is proposed to any trees as part of the application.</p>

Representation Comments	Response
<p>through loss of nesting, feeding and perching opportunities. Too much coronet cutting will also reduce the canopy and landscape value of the woodland.</p>	
<p><u>Fencing</u> We accept that there will need to be 2 lines of fencing on either side of the track. 1 - timber vehicle restraint fencing, and 2 - stockproof fencing to prevent children and dogs entering the woodland and Wetland areas. We understand that wire mesh needed for the latter cannot be incorporated into the former. It is important that the stockproof fencing extends the full length of the track, and links with other fencing around the north side of the wetland. We also agree with the suggestion that there should be 4 ft solid wooden fencing along the south side of the Track where it crosses the valleys. This would help screen noise from people, children, dogs and vehicles from the Wetlands, to avoid disturbance to wildlife. Adults would be able to see over the top and regular peep holes could allow children to see through. Fencing would need to be included in site maintenance so that any damage is repaired quickly.</p>	<p>A '4 ft solid wooden fencing along the south side of the Track' is not included as part of the RMA proposals.</p> <p>This would be out of keeping with the fencing proposed and approved across the rest of the reservoir site that has been designed to keep views open and maintain the countryside character. Instead the wire mesh fence will prevent access beyond the forestry track and thereby prevent direct disturbance of the woodland by dogs or children, whereas any noise is likely to be localised and will be transient so unlikely to cause a particular disturbance issue to wildlife in the wetlands.</p>
<p><u>Culverts twigs, branches, leaves and other woodland detritus.</u> The size of the culverts proposed (675 mm) does not look fit for purpose, especially as they will be of considerable length. Having screens at the ends will themselves tend to cause blockages. To reduce blockages and to enable cleaning and clearing when required, they need to be of larger diameter, enough for a person to easily enter if necessary. This will also allow for a more natural flow of water.</p>	<p>The culverts have been designed and sized based on the surrounding catchment areas, including the headwater streams to the north of each area, and provide sufficient capacity to convey these flows beneath the forestry track. Through the same design process, the invert level of each culvert has also been determined in order to allow heavier sediments within the water to settle before entering the culverts and screens implemented on either end of the culverts to prevent large debris from entering them and causing blockages. Increasing the culvert size is not therefore considered necessary to achieve the required hydraulic performance.</p>
<p><u>Planting on the embankments</u> Any planting should be of native seed mix or native species to enhance biodiversity.</p>	<p>Planting on the track embankments will be wetland and water's edge seed mix as specified on the application's landscape drawings. This replicates the same approved planting scheme as on the wetland embankment and utilises native species.</p>
<p><u>Crossing places for small mammals</u> It was not thought possible to include crossings for small mammals inside the culverts which are also expected to be frequently under water. However, we think that separate smaller tubes or pipes could be installed through the embankments above the expected water line, so that small mammals could more easily cross. The ideal diameter for these would need further discussion.</p>	<p>Following feedback from stakeholders, options for mammal ledges inside the culverts and bespoke mammal tunnels were explored during the design stage. However, to prevent the ingress of large debris, reduce siltation and minimise the risk of blockage, any pipes through the embankment must incorporate a debris screen. The presence of these screens would significantly restrict the ability of mammals to use the structures as crossing points therefore the provision of mammal crossing tunnels through the embankment is not considered feasible.</p>

We trust that the responses above are helpful, however, if you have any further questions on these points, please do let us know.

Yours sincerely

A. Turner

Andy Turner
Technical Director