Reservoir Embankment changes & inclusion of an offshore valve tower

Planning references: HBC APP/24/00311 EHDC ref: 51680/11

Havant Thicket Reservoir: Application for Reserved Matters relating to Phase 3 – Main Embankment; Changes in relation to siting, scale, external appearance and landscaping of the reservoir embankments, pursuant to condition 2. New layout is based on the revised Section 73 application layout, which includes the offshore valve tower.

Planning references: HBC APP/24/00312 EHDC ref: 51680/12

Section 73 application to vary Conditions 2 (pre commencement condition) & 3 (approved plans) for proposed changes to the size & alignment of the main reservoir embankment and related infrastructure including; a new offshore valve tower, changes to the Avenue Staircase & western viewpoint

Note: Comments submitted in relation to Application 11 (black & blue text) remain relevant in response to Application 12. For ease of reference additional objections, comments & concerns added in relation to Application 12 are provided in green text. Specific objections/ concerns in relation to the revised site drawings submitted with application 12 are included in Section G (pages 23-35)

I am concerned about a number of aspects of the revised layout for the reservoir embankments and ancillary infrastructure. Specifically, I wish to object strongly to the siting and appearance of the valve tower in the new offshore location on the following grounds.

- **Additional & unnecessary public health & safety risk of drowning**
- **Significant adverse visual impacts from key viewpoints which have not been adequately considered**
- **Not in keeping with rural landscape (urbanises views & makes it obvious it's a reservoir)**
- **Not in keeping with design criteria on public safety, intelligent design & need to ensure it blends into the sensitive ancient woodland & historic park landscape**
- **Risks associated with the top of the tower being accessible by boat,** encouraging people/ children to try and access the top of the tower to jump or dive off.
- **Risks associated with the tower being accessible during drawdown,** with people getting stuck in the mud trying to walk out to it.
- **Inadequate justification for need to move the tower offshore**
- **Inadequate alternative options appraisal**

Further detail and explanation on the reasons for my objection to the siting of the offshore tower are provided in Section A1 below.

I also wish to object to the current proposal to separate out the planning application for a secondary means of access (bridge) to the valve tower. For further information please refer to Section E below.

In addition, I would like to register a **holding objection to the changes, until the LPA have obtained further information to be able to better understand any direct and indirect impacts** of the embankment and other changes, including the need for provision of extra details for additional mitigation measures needed to offset the adverse impacts of the changes. Further comments are provided below in relation to the following matters, with the relevant comment number shown.

A1 Adverse impacts of moving the Valve Tower to an offshore location

A2 Concerns about change to the siting of the embankment in the east of the site & objection to the connection shown for Portsmouth Water operational vehicles to drive along the existing eastern boundary path (see also G1 & G6 re -Drg. 0001 Reservoir Outline Masterplan & the Landscape Plan for Gipsies Plain)

A3 Concerns regarding change to the siting of the embankment in the west of the site

B1 Loss of additional length of stream & area to create enhanced wet grassland in the SW as the embankment has been moved to the south (see also App C regarding the Biodiversity Impact Assessment not being robust)

C1 Visibility of the Control House as moved further away from Round Wood (less screening). The Landscape & Visibility Assessment provided is not robust, see App B)

C2 Reduced embankment slope having an adverse impact on Control House visibility (S73 slope change will result in more of the building/ walls being exposed, with no mitigation proposed, see also Section G4)

C3 Lack of detail on external appearance of the inner embankment

C4 Lack of detail on what is visible during drawdown events due to the change in slopes?

C5. Valve tower external appearance – concern at negative visual impact on views and lack of photomontages for critical new viewpoints around the reservoir site

C6. Valve tower external appearance – concern at lack of clarity on finishes

C7. Valve tower external appearance – concern at lack of detail provided (inc. on intakes)

C8. Valve tower external appearance if a bridge is provided for secondary access

D1. Concern at lack of detail on the landscape general arrangements, including lack of additional mitigation planting

D2. Stock proof fence on crest road needs to be more than a wooden post & wire fence

D3. Hedge & stock proof fence <u>not</u> shown on the south side of the embankment crest road

D4. Planned paths <u>not</u> shown traversing the embankment slopes from SCP

F1. Width of crest road likely to be too narrow to avoid user conflict

F2. No detail provided on embankment toe & other drainage nor where it will drain to?

F3. Phase 3 Ecological Mitigation, Compensation and Enhancement Report missing?

F4. Feedback on the Planning Statement (April 2024) - Concerns

F5. Feedback on the Env. Statement of Conformity – Concerns

App B – Landscape & Visibility Assessment not robust, summary of concerns on page 40

App D – ES Addendum 2024 conclusions based on unsound information/ assessment

Section G – Objections and concerns regarding the design changes shown on drawings;

G1. Reservoir Outline Masterplan Drg. 0001 (revised S73 version)

G2. Provision of a 6m wide Southern Access Road Drg.0002

G4. Landscape Plan – Control House Drg. 0004

G5. Landscape Plan – Avenue Staircase Drg. 0005

G6. Landscape Plan – Gipsies Plain Drg.0006

G8. Proposed Culvert & Valve Tower Layout Drg.0013

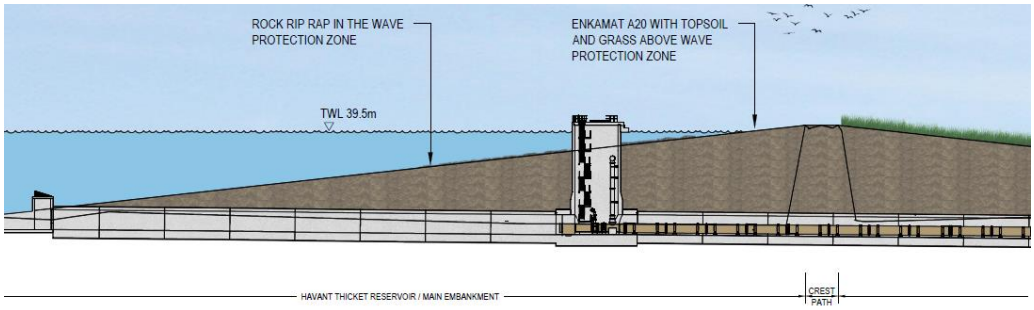
In addition to requiring changes to these plans, the LPA should seek a more ambitious plan for the western viewing area (Drg.0009), with involvement of the local community, particularly schools, in the development of the design.

My objections and concerns are set out in more detail below under the section headings of siting (A), scale (B), external appearance (C) and landscaping (D), with other comments on the information supporting the application 11 made in section F.

A. Siting

A1 Adverse impacts of moving the Valve Tower to an offshore location

I object to the valve tower being moved from a location within the main southern embankment in the approved application where it would not be visible to a very clearly visible offshore location (see extract of section below).



Extract of Section C from Main Embankment Section B & C, Drg. HTR-GHD-ZZ-ZZ-DR-T-0009 submitted with application 12

Note: it is very disappointing that none of the landscape sections submitted with application 11 show clearly that the valve tower is now being moved to an offshore location, this may have been misleading to anyone who viewed the application drawings.

My grounds for objection to an offshore tower are as follows;

a. **Additional & unnecessary public health & safety risk of drowning** – Major concern that as the tower is now very visible children (schools including an infants very close by), youths & drunks from the nearby pub will want to try and swim out to the valve tower with a resultant significant increase in the risk of drowning. The risk of drowning was a significant concern to the local community when the reservoir was first proposed in this sub-urban location where large numbers of families live, and that is why Portsmouth Water rejected the inclusion of an offshore tower in the outline design, instead requiring the consultants to design this risk out. In the new design layout the valve tower is now shown very close to the shore and the temptation/ challenge to swim out to it will be high, creating a predictable high risk (high probability/ high hazard impact of drowning). With the risk of them also being tempted to try and jump/ dive off the valve tower.

   Page 13 of the Planning Statement confirmed a key design principle remains to; "**Create a safe environment to work & play**. Use creative design to minimise any short & long-term health & safety issues." The change of design to locate the tower offshore is a clear breach of this intelligent design key principle. It is very disappointing that Section 2.4.6 of the S73 Eng. & Design Report Addendum (page 13) confirmed that the increased risk of drowning/ public safety associated with the decision to move the tower offshore was **not** even considered.

   It is better, easier and safer to design out risks to the public (especially children) which you cannot ever adequately control to prevent accidents by not having the tower offshore, and

instead dealing with any engineering design risks through intelligent and robust design, along with a high level of supervision and auditing during construction. Portsmouth Water have confirmed on a number of occasions that construction of the valve tower within the embankment, as shown in the outline design which received planning consent, can be done safely from an engineering perspective. Therefore, **the current offshore location should be rejected by the LPA on the grounds of public safety** in this sub-urban setting, where large numbers of families live very nearby, along with close proximity to an infants and other schools. My concern would increase significantly if there is any chance of currents, eddy's or a vortex being created during water draw-off at the high and low level intakes on the tower. Noting that under Southern Waters plan water abstraction from the tower would operate 24/7. But no information is provided on the likelihood of currents etc. with the application on this, not even in the Eng. Report Addendum.

b. **Adverse visual impacts of an offshore tower – breach of design principles**; The significant change in the visual appearance, with a concrete valve tower offshore (with associated rails, signage, security measures etc.) making it very obvious that this is a man-made reservoir, rather than a natural lake, which is contrary to the design objectives in this sensitive ancient woodland & historically significant landscape setting. Making the reservoir look as natural as possible to blend into the local historic landscape was and still is a critical part of the design. The **proposal for an offshore tower breaches the following key design principles** set out in the planning statement on page 13.
    - Maintain & **integrate with the rural landscape** character and woodland setting, through **the design layout and material selection** process, and where possible developing soft engineering solutions- **limiting structures & ancillary clutter.**
    - Design to be **sympathetic to and blend in** with the historic park and gardens landscape. Specifically considering impact on setting and views to and from the designated sites including the Grade II listed park & gardens, conservation area and South Downs National Park.

The Landscape & Visibility Assessment is not robust, see concerns raised in App B (pg 41/42)

c. **Adverse visual impacts - lack of information for LPA to adequately assess changes;**
The new design adds to the ancillary clutter and places an unnecessary concrete structure in plane sight of the public viewpoints and it may be visible from the important Terrace Viewpoint within the historic park & gardens. However, insufficient detail is provided to determine this for certain. A section needs to be provided from north of the new valve tower position to where it could be most visible from on the SCP Terrace viewpoint from where the SW embankment of the reservoir is visible, and the visibility assessment confirms that the reservoir shore will be visible. The top of the tower which is higher than the adjacent embankment crest will also be visible from the designated conservation Area boundary.
The visual assessment assumes that the tower terminates 0.6m above the embankment crest road. However, it does <u>not</u> consider the additional height added by the 1.2m high railings shown on Drgs. 0015 & 0020, nor the ugly nature of additional security fixtures that will be needed (spikes, sloped barriers etc.) and large safety signage, as none of that is shown.
There is no assessment of what is visible during drawdown events that may be prolonged, when more than 12m of the tower will be visible, down to the Lower Intake structure. The Eng. Report on page 5 confirms that the lowest operating level will be 27.5m. None of this is made clear on the drawings or information submitted with application 11, which only refer to seasonal changes of 1 – 2m, meaning in reality that even seasonal annual changes will leave up to 3.5m of the tower exposed in summer (<u>not</u> including the additional 1.2m safety rails on top).

The proposal should be rejected as the valve tower does not have to be located off-shore and therefore **any adverse impacts at all are actually unnecessary**.

The Landscape & Visibility Assessment is not robust, further comments/ concerns are set out in App B (pg 41/42)

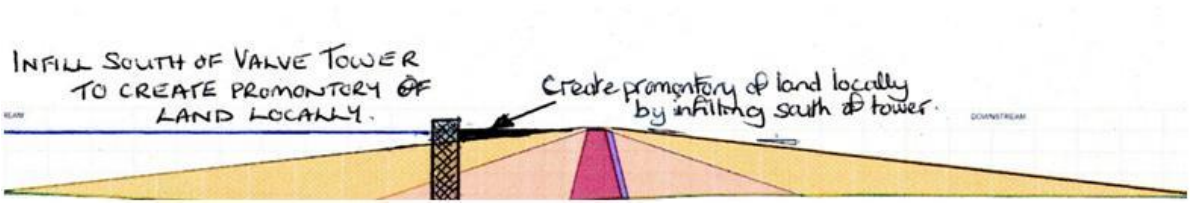
d. **Justification for change in location and alternatives assessment not robust;** The justification for moving the valve tower offshore is not robust, with very little information provided on the alternative options considered. **From an engineering perspective the change is only described as 'preferable', it is not essential**. Portsmouth Water have confirmed that the original location for the valve tower within the onshore embankment was safe.
Further information on my concerns in this respect and why the information provided is not sound to justify the proposed change in location of the valve tower offshore are set out in Appendix A (page 36 & 37).

e. **Risk associated with the top of the tower being accessible by boat;** The last page of the The Eng. Report and the 'You Said We Did Report' submitted with the applications indicate; The top of the valve tower can be accessed by boat, pontoon, or other method as a secondary means of access in the case of emergency. If this is the case public access could also be possible by determined individuals. This adds to my concern regarding the health & safety risks of drowning, as children/ people will be tempted to swim to get to the tower to jump or dive off.

f. **Risk associated with the tower being accessible during drawdown**; During drawdown the lower intake at the bottom of the tower is indicated to be exposed (Planning Statement page 9, para 2.9) People/ children may be tempted to try and walk out to the tower when water levels are low and get stuck in the silt. This is another significant health & safety risk for the community/ visitors which is created by the valve tower being located offshore when it is not necessary if the intelligent design principles were applied.

g. **Need to mitigate impact of placing the valve tower off shore;** If the mitigation hierarchy were followed, the multiple impacts would be removed by not having the valve tower in an offshore location.
There is no way of softening the impacts of placing the valve tower offshore and therefore this is an unsuitable location which should be rejected.

The majority of the concerns can easily be resolved by reverting to the original outline design with the valve tower contained within the southern embankment, or by filling in the space occupied by water on the section above (page 3) to the right (south) of the tower, this could be done using compacted clay to form a promontory of land out to the valve tower, so that it is not located offshore, as was suggested at the recent Feb 2024 stakeholder workshop.



The additional promontory could double as an extra viewpoint/ rest point to break up the long walk around the reservoir, giving a win-win situation. Drg. 0013 appears to already show a small promontory on the embankment crest adjacent to the position of the valve tower, which is not labelled, but I would assume it provides a platform for the installation of any crane needed for future maintenance. Surprisingly the top water level is not shown on drawing 0013, but it certainly appears

that only a small extension to the existing promontory would be needed for the valve tower not to be located offshore (see feedback item G8, page 33 & 34).

Note: It is very disappointing that drawings 0013, 0015 and 0020 which illustrate the valve tower do not show top water level, making it difficult for the public and stakeholders to recognise that the proposed location of the valve tower is now actually offshore, which is a major design change. Nor are the drought or maintenance drawdown levels shown to enable an understanding of what will be visible of the tower under these circumstances. The Planning Statement page 9, para 2.9 indicates the lower intake at the bottom of the tower will be visible (see also concerns at 'd' above).

The LPA should **reject the proposal for an offshore valve tower on the grounds of high visibility and landscape impact** (urbanisation in a sensitive ancient woodland historic landscape), **as well as public safety concerns** in this area where large numbers of families live very close-by, along with an infants and other schools.

Instead the LPA should press the developer to return to the original approved location for the valve tower within the onshore part of the embankment, or to instead create a localised land promontory to ensure the tower is not located in an offshore position.

If the LPA are minded to grant consent for an offshore tower the developer should be required to provide additional information to show more detail and confirm the following before any decision is made.

- To confirm there will be no other secondary means of access to that currently shown, such as a bridge, and if there is the decision must be made & and details provided, so that an informed decision can be made by the LPA on the full impact of moving the valve tower to an offshore location.
- There will be no steps up the side of the valve tower that could allow a person or child to swim out and climb the tower, or jump/ dive off from it.
- The outer surface needs to be of a material and texture that does not allow it to be climbed.
- There needs to be an overhang at the top of the valve tower to make it impossible to gain access to the top of the tower from below.
- Further details of other deterrent aspects of the tower structure should be provided (e.g. angled barrier, spikes etc.) to enable their effectiveness and landscape/ visual impact to be assessed.
- Details of likely signage needed so that its visual impact can also be assessed as part of the LPA evaluation and decision making process.
- If it is determined that a secondary emergency means of escape is required from the tower this should not be in the form of a bridge, nor permanent steps down the side of the tower, instead a foldable ladder should be stored inside the top of the tower so that it can be removed and only attached/ lowered for escape to a boat in an emergency.
- Provide a cross-section from north of the offshore valve tower to the most visible part of the SCP Terrace view point, to make clarify what elements of the valve tower could be visible.

A2 Concerns about change to the siting of the embankment in the east of the site

The eastern embankment has been widened and moved, including the addition of **a significant extension of the embankment to the north by about 60m.** There has been an ongoing and significant concern amongst stakeholders about the lack of space available along the eastern boundary to accommodate the ancillary infrastructure needed including the multi user recreational access path, and enhancements to the wildlife corridor which is under threat from other development at this key pinch point. It is not clear how significant the change in the siting and extension of the eastern embankment is in determining any direct or indirect impacts on the competing demands for space at the very constrained eastern side of the site.

The LPA need to request additional information including a new general arrangements plan for the critical eastern confined area to establish (see also G6, page 32);

- How will operational vehicles using the embankment crest road leave the embankment crest safely to join with the operational access road east & south of the embankment toe?
  Note: The plan was to have a turning head where vehicles left the embankment where the 2 roads join. It is very difficult to see how a turning head will be accommodated given the change in the location of the embankment.
  More detail and a plan is needed to show how vehicles will leave the embankment crest road safely, without impacting the safety of the narrow multi user recreational route along the eastern boundary?
- Will the change in embankment location have any direct or indirect impacts on the space available for, and width of the eastern multi user path which runs along the site boundary?
- To accommodate the revised embankment location, vehicle turning head and upgraded multi-user path will any additional existing (e.g. willow hedge) or newly planted trees need to be removed?
- Where will the proposed new open water course/ channel join the existing ditch along the eastern boundary and how will this be accommodated without any tree loss given the other competing demands for space in this confined area?
- Will the change in the embankment position leave enough space for additional vital landscape planting along the narrowest part of the eastern wildlife corridor which is intended to replace the Avenue ancient woodland peninsula?
  Note: This is especially important as a significant part of the wildlife corridor on the east side of the site is provided by land in the ownership of a developer who has been seeking planning permission to build houses on the paddock. This is at the location where the existing tree line along the eastern wildlife corridor is narrowest and at greater risk, so additional planting in this area to guarantee robust connectivity on the Portsmouth Water land is essential.
- As an application has been made now to move the eastern embankment could the opportunity be taken through an intelligent design process to move the eastern embankment slightly further to the west to create more space for these important ancillary features, and allow additional space for tree planting to reduce the significance of the existing vulnerable pinch point in the eastern wildlife corridor.

I **object to the significant change in position/ width and the extension of the eastern embankment** north until such time as the developer has provided a general arrangements plan (including landscaping) which shows that all of these important ancillary features can be accommodated in a sensible and safe way, without any direct or indirect impact on the exiting trees or new planting that forms the eastern wildlife corridor.

Noting that the Contractor has **not** provided a plan with the application to show the area of critical impact associated with the embankment design changes in the east. The plan provided for 'Landscape Plan_Gipsies Plain' starts too far to the south and also does not include the new water course to be provided to the west of the Phase 1 woodland planting corridor (see G6, pg 32).

I am also concerned that the operational access road on the east/south side of the embankment is shown terminating in the existing multi user boundary path. Surely the developer is not planning for PW operational vehicles to drive along this existing eastern boundary path as it is too narrow, has blind bends, and already carries additional pedestrian and cycle traffic between Havant Thicket and Staunton Country Park.

If they are planning **for operational vehicles from the crest road or toe road to exit onto the eastern multi-user path** then I would be very concerned and **object to this change in the design**. As indicated above the LPA need to seek clarity on the operational vehicle routes to be used and seek reassurance that vehicles will not be using the existing eastern boundary path.

A3 Concerns regarding change to the siting of embankment in the west of the site

The western embankment has been widened and there is a lack of detail on how the paths and southern access will be accommodated in the limited space now available. Application Drg. 0011 & 0019 show this area, but it is indicated to be outside the Reserved Matters application area, but it is unclear why as changes to the width/ footprint are also being made to the western embankment are being made. The general arrangements drawings are very simplistic and do not show important details. For example;

- Whether planting can still be accommodated between the reservoir and the southern access road? As a minimum where there is no embankment to provide screening there needs to be planting shown on the relevant general arrangements drawing, to ensure that cars using the southern access road are screened from key views around the reservoir, so that the road and cars using it do not detract from the rural setting.
- This is the detailed design stage yet there is no information included to show where gates will be installed to control access at the site boundary to legitimate site users, with only limited information on fencing. The general arrangements drawings need to include more detail on where such features will be located.

I **object to the significant change in position/ width of the western embankment** until such time as the developer has provided a general arrangements plan (including landscaping) which shows how the new southern access, multi user routes and new planting for screening purposes can be accommodated in a sensible and safe way in the confined western area.

The LPA need to request the additional information and a more detailed general arrangements drawing before determining the application to establish how the new southern access, multi user routes and new planting for screening purposes can be accommodated in a sensible and safe way in the confined western area.

Further feedback on drg.003 for the western area is included at G2, page 27/28, where I object to the inclusion of a 6m wide two way carriageway, along with an explanation as to why.

B. Scale

The width of the embankments and their position has changed significantly which gives rise to concerns that have not been adequately addressed in the current submission. The LPA need to seek further information and mitigation to address these concerns as set out in A2 and A3 above.

B1. Loss of additional length of stream & area to create enhanced wet grassland in the SW

The SW embankment has been lengthened by 60m and the southern toe now extends 40m further to the south, moving it closer to residential properties at Winterslow Drive. This has two negative impacts that have not been highlighted and addressed in the current application for the changes to the embankment footprints.

a) An additional section of the existing stream and associated habitats, which is a feeder stream to the Riders Lane Stream is now **permanently lost**.
b) There will be less habitat area available for the re-establishment and enhancement of wet grassland habitats to create priority habitats than was part of the previously approved mitigation strategy.

There has already also been the loss of additional priority wet grassland habitat in this area caused by recent works in the SW, which means the enhancement to the habitat to create more priority habitat previously committed too cannot now be delivered, because the habitat has already gone.

The proposal to move the SW embankment approximately 40m further south along the stream line will reduce the potential for this priority habitat to be re-created and expanded, resulting in a biodiversity loss.

While more open space/ parkland type habitat is created by moving the southern embankment north between Round Wood and The Avenue peninsula stub, this area is located on higher ground, further away from the stream, which has far less potential to be developed into the wet priority habitat previously present.

As a result the LPA need to require a review of the previously approved mitigation strategy which formed part of the original planning application, by a competent specialist, to consider the impact of the proposed new embankment changes and assess what further mitigation will be necessary at the site and set out how the loss of additional wet grassland / BAP habitat will be addressed?

Further information regarding concerns in relation to the biodiversity impact and the lack of a robust assessment are set out in Appendix C (pages 47/48).

C. External appearance

C1. Visibility of the Control House as moved further away from Round Wood

The embankment is moving north further away from Round Wood by about 30m, which means the Control House and associated high compound walls will also move further away to the north. This will reduce the screening effect that Round Wood provided from key views at Gammon Hill/ Memory Park, SCP woodland edge, the SCP Conservation Area and residential properties at Well Meadow. The footprint for the width of the control house and associated high compound walls is shown as 45m on Drg.0013, so this is a significant concern, especially given the height of up to 6m.
No mitigation for this negative impact on visibility from the change to the siting of the embankment is proposed by the developer.
However, the increase in the gap between Round Wood and the toe of the embankment provides the opportunity for additional tree planting which would;

- Help with the medium to long-term screening of the Control House in this sensitive area of the landscape adjacent to the Historic Conservation Area, protecting rural views from urbanisation.
- Help create a younger graded edge to Round Wood which would have significant biodiversity benefits. This will also help to mitigate other ecological impacts of the changes.

The LPA should require provision of mitigation planting to better screen the new location for the siting of the Control House to address the negative impact of moving the embankment further north which reduces the previous screening benefit provided by the remaining fragment of Round Wood.

Note: The Design & Access Statement for the original hybrid reservoir application at Section 6.28 emphasised the location of the culvert results in less impact on the Conservation Area, as the Control House can be screened behind the retained trees in Round Wood, protecting views from the Historic Park & Conservation Area, especially from the south and east. Therefore any change to the screening protection offered by Round Wood should be considered significant and mitigation provided.

The Design Parameters (page 4, Eng & Design Report Addendum) reserve the right for the embankment still to move a further +/- 20m horizontal range from the crest shown on the Main Embankment Layout Drg. 4002. This is of concern. Now that the additional ground investigation and trial embankment are complete the design should be at an advanced stage.

- The LPA should not approve maintaining such a large variation.

C2 Reduced embankment slope having an adverse impact on Control House visibility

The cross-section on Drg.004 confirmed that the embankment slope in the vicinity of the Control House will be reduced from a 1 in 5 slope in this area to a 1 in 9. Without local modification to the design this means that the **Control House and high ancillary compound walls will protrude more from the gentler slope of the embankment. This is a material change which needs to be robustly**

assessed as it will make the structures more visible than before from key vantage points within the Grade listed Park and Gardens, the Conservation Area, Gammon Hill and residential properties in the Well Meadow area.

Moving the Control House and embankment between 19m to 30+m to the north within a gentler slope is going to results in the Control House being more visible from key vantage points, if no action is taken. **Additional design work should be undertaken to ensure as much of the Control House structure and compound walls as possible remains buried in the new landscape**, especially given that the benefit of the woodland screening will also be reduced if this structure is moved further away from Round Wood, as is proposed in the new site layout for which Reserved Matters planning consent is being sort.

The Control House and compound are very close to the toe of the embankment. The developer **should explore locally changing the landform in this area to ensure that more of the structures are covered or concealed.** It is not the engineered structure of the embankment that I am suggesting could be altered, it is the addition of soil/ landscape detail over and beyond the engineered part of the embankment to hide the structures. This could provide mitigation screening to offset any residual impact of the proposed changes which currently will make the building and associated structures more visible. Details of how this will be achieved to provide an additional benefit instead of a negative impact should be set out with cross sections provided in additional supporting information.

I note that the annotation on the relevant cross-section on Drg.0009 indicate that the Control House detail will be provided in a later Reserved Matters planning application. However, **the embankment location & slopes are being fixed now by this application**, so it is important that the developer review the impact of slope changes now to establish what changes to the embankment slope can be done locally to screen the control house and walled courtyard as part of the embankment design changes.

The LPA need to require additional information on changes to the embankment slope needed locally to help hide/ screen the Control House and high ancillary compound walls, or at least get a written assurance that further redesign of embankment slopes will take place locally to hide as much of the building and hard engineered features as possible, to address the negative impact of the proposed reduction in slope gradient.
Further feedback on the inadequacy of the Landscape & Visibility Assessment and why it is not robust are set out in Appendix B (pages 42 & 43)

C3 Lack of detail on external appearance of the inner embankment
Planning Statement information;

- Section 2.5 states that "The inside slope of the embankment will include rock rip rap in the wave protection zone and Enkamat A20, as an erosion control mat, with topsoil and grass above the wave protection zone."
- Section 2.24 states that "The details to be submitted under Condition 28 will accord with the details on these plans unless otherwise agreed with the LPA."

The name for the armouring materials is stated on cross sections submitted for approval (drg.0018) as Rock Rip Rap and Enkamat A20. These materials will cover very large areas of the embankment inner slopes, some visible all the time, others seasonally, or during drawdown, yet no details have been provided as to what these materials will look like, nor on their durability. If drawing 0018 is to be approved and the later detailed submission is proposed to use these materials it is reasonable to expect details of the materials to be submitted now for consideration as part of the approval.

For example, the Enka website indicated that Enkamat A20 is a three-dimensional **open polyamide mat** containing a mineral filter of **chippings bound with bitumen** and has 40 to 50% voids.

- Does the bitumen binding pose any risk to water quality?
- What are the chippings made from?
- As it breaks down with time are the components biodegradable?
- Has it been used in other reservoir settings before? (photos to be provided)
- How long can it be expected to last before it starts to breakdown?
- What does it look like when it starts to erode? (photos?)
- How does it compare in a sustainability, climate impact assessment compared to other alternatives? (No alternatives options appraisal)
- Is there any risk that anchor pins could be pulled out, or the mat set fire as a result of anti-social behaviour?

For the rock rip rap armouring what type and colour of rock will be used? (photos to be provided). What size of rock is to be specified? Where will it come from? Has this been included in a sustainability assessment, climate impact assessment? (No, not assessed in the ES 2024)

Note 1: The rock would ideally be a hard limestone to fit with the calcareous source of the spring water. The rock size must be large enough that it cannot be collected/ stollen by the public.

Note 2: The embankment extension in the SW (60m),eastern arm extension north (60m), along with the proposal for gentler embankment slopes mean that more of both the Enkamat A20 and rip rap rock armouring materials will be required, creating additional vehicle movements (delivery & onsite). This along with the longer length of the concrete culvert means that there are significant changes in material volumes and which needs to be considered as part of the updated ES assessment for material resources, traffic movements and climate impacts. This has not been submitted with application 11.(see also F5g below)

Note: This has not been adequately considered in the ES Addendum 2024 submitted with application 12, concerns/ feedback provided in Appendix D (Section C&D on pages 50/51)

C4 Lack of detail on what is visible during drawdown events due to the change in slopes?
The visibility impact assessment makes reference to the proposed gentler slopes of the outer embankment potentially having some benefit, as the slopes may look more natural and blend into the existing embankment. However, there is **no recognition** that as water levels drop during drawdown events the gentler slopes proposed on the inner embankment can **have a negative impact**, **with more of the inner slope exposed more quickly** due to the gentler slopes. Nor is there information on the revised borrow pit locations and likely slopes which will also impact what is visible during drawdown and what water areas of the reservoir will retain water.
A muddy bowl creates a completely different landscape character in this historic setting to that of a full reservoir and it is important that the changes to the embankment design/ layout are properly considered in this context.
Clarity should be sort on;

- What of the Upper & Lower Intakes on the tower will be visible during drawdown? Noting that the Eng. Report confirms on page 5 that the lowest operating level will be 27.5m, in which case 13.5m of the tower will be visible, with further railings and other ancillary features visible on top of the tower.
- Will any of the planned new inlet pipework or associated pipe termination headworks which it is now proposed will run along the reservoir floor be visible during drawdown?

In 2019 the LPA originally asked for information to be presented from key viewpoints as to what the reservoir would look like when full and during drawdown, but the latter information was not provided with the original hybrid planning application in 2020.

Now that it is proposed to change the gradient of the inner slopes which will have a negative impact on the area of exposed embankment/ mud during drawdown events, the LPA should ask for visual evidence to see the difference between what would have been exposed under the original hybrid design compared to the proposed new embankment layout. This will then enable a better understanding of the impact of the changes before a decision is made. It is essential that that details of what will be visible on the tower is submitted for consideration before any decision is made by the LPA.

C5. Valve tower external appearance – concern at negative visual impact on views

The Planning Statement page 10 & 11confirmed that the Reserved Matters application 0011 is seeking approval for details of siting, scale and external appearance for the valve tower shown on drawings 0013, 0015 and 0020.

Key concerns/ comments on the inappropriate siting of the valve tower in an offshore location are already set out in Section A1 above, with specific concerns about the visibility of the tower from all around the reservoir and from the historic vantage points (including the key SCP Terrace viewpoint area with the Grade II listed Park & Gardens, as well as from the designated Historic Conservation Area) as highlighted in A1b above.

The offshore tower will be highly visible from both the Avenue Staircase viewpoint and the western viewpoint adjacent to Memory Park (not mentioned in the Statement of Conformity page 7 & 8) urbanising the view, but also from the visitor centre, hides/ view points along the northern shore of the wetland, the concrete structure emerging by up to 3.5m above the seasonal water level (Planning statement para 2.11) and 0.6m above the embankment crest making it very obvious that this is a manmade reservoir, not a natural lake, detracting for the much more natural landscape that would have been created if the valve tower was hidden within the embankment as approved in the outline design . It changes the view from across the reservoir site, even at more remote locations around the east and north side of the reservoir. Visitor's eyes will be drawn to the non-natural feature detracting from the rural landscape character in this sensitive ancient woodland and historic environment, contrary to the key design principles for the reservoir.

No photomontages are provided from new view points immediately around the reservoir site in the Visibility Impact Assessment which was submitted with application 12.

Further comments on the inadequacy of the Landscape & Visibility Assessment are provided in Appendix B (pages 41 to 46)

I completely disagree with the Statement of Conformity page 7 & 8 which suggests that moving the valve tower offshore only impacts a small area, so the overall effect would be 'no change'.

The LPA should reject the Visual Impact Assessment and assertion made in the Statement of Conformity which is clearly flawed, especially when you consider visibility during seasonal variation in water levels.

The LPA should request information (e.g. photomontages) be provided to show what the valve tower will look like, and how much of it will be visible, when full and during drawdown from; the Avenue Staircase view point, the western viewpoint adjacent to Memory Park, but also from the visitor centre, hides/ view points along the northern shore of the wetland

C6. Valve tower external appearance – concern at lack of clarity on finish

Page 9 of the Planning Statement (Section 2.11) and page 61 of the Environmental Statement Addendum 2024 confirmed that the valve tower will be "**concrete with a plain, neutral coloured finish**". It is not clear whether the concrete provides the neutral colour finish, or whether it would have a painted finish?

- If so, what colour?

- Will the same finish/ colour be applied above and below top water level?
- If so, how long can any applied finish be expected to last above and below top water level before it looks a mess?
- How smooth will the finish be? (could a person/ child climb up it)

Given the prominence of the valve tower in an offshore location close to key new view points the LPA should seek further details from the developer about the finish and external appearance of the valve tower before assessing the visual impact and acceptability of revised design.

C7. Valve tower external appearance – concern at lack of detail provided
Sections for the valve tower are provided on drawings 0015 & 0020, however, key details which impact the external appearance are lacking or unclear (see also G9, page 34).

a) The detail of the Upper Intake and what it will look like is unclear. A structure is shown protruding from the left side of the tower section on drg.0015, which is likely to be the Upper Intake but it is not labelled. The cross section on drg.0015 for Floor E & on drg. 0020 Section A suggest that the Upper Intake is a concrete structure protruding a significant distance from the tower, some of which is buried in the embankment slope, but elements of the structure are likely to be clearly visible from both the new western and Avenue viewpoints and other vantage points along the crest path when the reservoir is in drawdown?

   The S73 Engineering & Design Report Addendum, para 2.2.13 states; "The high level intake structure consists of a concrete headwall with rock lined channel extending to the face of the inner embankment slope. This structure will not be visible under normal operating conditions of the reservoir due to its positioning below the top water level. In **drought scenarios where the water level drops below the intake structure; this will be visible**."
   The LPA need to request further details from the developer on the construction and materials to be used for the Upper Intake, including details of the steel external screens that will be present, to ensure there is a clearer understanding of what the Upper Intake will look like, and to confirm that it will be safe when more accessible during drawdown. For example, if a child were to swim out to it. (see c below)

b) Top water level, seasonal normal summer water level, drought drawdown level and maintenance drawdown levels are not shown/ labelled on the sections included on drg. 0015 or 0020. This critical information should be shown on revised drawings as it is important to understanding what elements of the offshore valve tower will be visible during various scenarios, and how often this will occur. (See also 'f' below)
   The LPA need to request revised drawings showing the water level around the tower under different operational scenarios to ensure they fully understand what of the valve tower features and how much of the tower will be visible in different operating scenarios, <u>before</u> making any decision if they are minded to give consent.

c) Details for the **screens** on the Upper & Lower Intakes need to be provided to understand what will be visible under different drawdown scenarios. Reference is made on drg.0020 to there being trash screens over the opening of the Lower Intake. The Intake Structure Plan View refers to trash screen bars at 150mm spacing, this is wider than a stair banister rail spacing which is required to prevent a childs head passing through. Further consideration needs to be given to;
   - The spacing of the trash screen bars to ensure that if a child obtains access to the screens during drawdown they do not pose a health and safety risk.
   - Whether vortex or currents are likely in the vicinity of the screens?

- How the trash screens will be cleared regularly without the need for divers? For example, can water flow be reversed to clear the screens?

The LPA need to request further details on the trash screens to be provided at the various intake positions to enable a fuller understanding of what will be visible from the crest path, what risks might arise and how the screens will be cleaned and maintained?

d) A rail is shown at the top of the valve tower on Section E(drg.0020) which rises above the stated height of the tower of 41.1m (Planning Statement, para 2.11 & ES Addendum page 61 para 10.8.6 of the Landscape & Visual Impact Chapter both refer to assessing a height for the tower of 41.1m). Yet the safety rail rises to a height of 1.2m above that and will add significantly to the visibility of the valve tower, which itself is already 0.6m above the crest path level. With the rail included the tower structure will rise to 1.8m above the crest path level.

- The presence of the safety rail needs to be fully considered as part of the visual impact assessment.
- On drg.0020, Section A shows the safety rail on either side of the tower, but not on the one face viewed. Presumably the rail is missing from this side of the tower to allow access via boat, as mentioned in the Planning Statement. If access is possible via a boat for operational staff, then there is also a risk of access by members of the public/ children who will see accessing the tower as a challenge, especially as a feature they would want to dive/ jump from.
- An overhang at the top of the tower is shown on one side of the top of the tower, but no other features are shown to discourage unauthorised access to the top of the tower. Perhaps overhangs and spikes may be used to try and make unauthorised access more of a challenge. These would add to the width and ugliness of the tower. If features are to be added to reduce the heath & safety risks these should clearly be shown on the application drawings now, so that the full visual impact of the tower and urbanisation of the views can be properly assessed compared to the original outline design (with no offshore tower) <u>before</u> any consent is granted.

The LPA need to ensure that the presence of the safety rail is fully considered as part of the visual impact assessment as it significantly increases the height of the tower and adds to the visibility and urbanisation of views. They also need to consider the health & safety impacts associated with unauthorised access to the tower and any additional ugly ancillary infrastructure that is needed to discourage this.

e) Additional labels should be added to the valve tower drawings to aid understanding of the different features shown, especially those that will be visible on the exterior of the tower during different operational drawdown scenarios.

f) On drg. 0015 there is a solid line shown to the left of the tower at a level of 40.75m, it is not clear what this line is intended to represent as it is not labelled? It is probably just a level marker line, but other level markers lower down the structure are shown as a dashed line. I am concerned that some people may think that this solid line represents the top water level of the reservoir which it does <u>not</u>, as the top water level is lower at 39.5m. With the Planning Statement at Section 2.11 confirming that 1.5m of the tower protrudes above top water level when full and up to 3.5m is exposed seasonally, with the water level dropping 12m to the Lower Intake in a drought scenario. As stated in 'b' above the depth of water under different operating scenarios must be added to the drawings to aid understanding by the public,

stakeholders and the LPA of what parts of the structure will be visible in different scenarios and for how long, to enable proper consideration of the visual impacts on views.

C8. Valve tower external appearance if a bridge is provided for secondary access
Any proposal/ decision at a later date to add a bridge as a secondary means of access to the valve tower would have a significant detrimental impact on views from around the reservoir, especially from the view point at Memory Park in the west and the Avenue viewpoint. It could increase the visibility of the tower from the SCP historic terrace viewpoint. As a result it is essential that a decision is made by the developer now as to whether a secondary means of access to the tower is required, and if so whether that will be in the form of a bridge from the southern embankment, so that a full evaluation can be made by the public, stakeholders and the LPA before any decision to approve the inclusion of an offshore tower is made.

Note the comments made in Section E below where I **object** to their being a delay to allow a separate later application for the secondary means of access to the tower, when the tower and any bridge are intrinsically linked and should be considered and determined as one entity.

D. Landscaping

In response to this application I have focused on the concerns / comments relating to the landscape general arrangements for the embankment areas. Comments on detail for specific zones for which general arrangement drawings have been provided with application 12 are provided in my feedback for that planning application (see Section G, pages 25 to 35), but are also relevant to this application (11).
I note that the Landscape Specialist for HBC has raised no comments in their response, and I would ask that you share this response with both the HBC and EHDC specialists so that they may consider my concerns, including concerns about the Landscape & Visibility Assessment described in Appendix B (page 40 to 46).

My previous concerns and comments submitted on 22/4/24 in relation to landscaping and screening for the wetland, especially the lack of landscape screening in the west & east, as well as at identified view points in the north (hide locations) remain relevant to the need for additional landscape detail for the reservoir outside of this reserved matters area (Application references APP/24/00186 & 51680/008).

D1. Concern at lack of detail on the landscape general arrangements
While this application seeks approval of the general arrangements for landscaping there is a surprising lack of detail submitted with the application. While it is acknowledged that there will be a later application with detail of the planting spacing/ species & hard landscape materials specification to discharge Condition 28, **the layout and general intent of the planned landscaping should all be shown on the current general arrangements drawings**. The planning statement (page 11, 2.24) for planning application 11 confirms that the detail shown on application drawings 0019, 0011 & 0018 for hard and soft landscape are **submitted for approval**.

- Main Embankment Landscape Plan – Drg. 0011
- Main Embankment Landscape Cross-sections LA1- LA3 – Drg. 0018
- Main Embankment Reserved Matters Application Area – Drg. 0019

It is also surprising that a drawing has not been provided to give an overview of how the embankment positions have changed since the original hybrid planning application was approved in 2020, especially as the changes to the embankment positions are substantive and go well beyond the

tolerances allowed for in the original hybrid planning consent. As a result it is very difficult for members of the public, stakeholders and the LPA to easily understand the extent of the changes and consider their significance. A drawing of this kind was available to stakeholders that attended a workshop run by Portsmouth Water in February 2024, so it is disappointing that this has not been included with the current supporting documents for application 11.

Additional information needs to be submitted to clarify details on the following.
a) **Detail on fencing locations is missing or lacks detail** (see D2 & D3 below)
b) **Location of planned access paths are missing from the embankment slopes** (see D4 below)
c) **Lack of detail on materials that will cover large areas of the inner embankment** (see C2 above). If landscape cross-section drawing 0018 is to be approved and the later detailed submission is proposed to use these materials it is reasonable to expect details of the materials to be submitted now of what these materials will look like for consideration as part of the approval and how long the materials will last.
d) **Indirect impact of moving the embankment on any tree loss is not clear;** It is not clear if there will be any indirect effects resulting in tree loss as a result of widening and moving the embankments in order to then accommodate other essential ancillary infrastructure including; a vehicle turning head, new open water course or the wider multi user route? (*Section A2 above refers*). For example, will any of the eastern willow hedge need to be removed?
e) **Spillway location not shown on Drg. 0011?** The Spillway shown on Drg. 0007 (Landscape Plan for Viewing Platform) submitted with planning application 12 is not shown on Drg. 0011 submitted for approval with this application. It is unclear what of this structure will be visible within the landscaping?
f) **Pink indent on inner embankment slope not explained;** An indent in the pink inner embankment shading is shown to the north of the western viewing area. Is this an error, or perhaps the planned slipway location? If it is the latter than an access track for vehicles & boats is not shown? What is this indent in the pink shading?
g) **Query on proposed planting below top water level**; Wet grassland seeding (Barenberg) appears to be proposed on Drg.0011 below top water level. The species mix for Barenburg planting shown on the landscape drawings for the wetland planning application appear to be suitable for wetland edge habitats, <u>not</u> for habitats which will generally be under water. Further consideration needs to be given to what planting/ seeding is appropriate on the inner embankment slopes.

Before approving the landscape general arrangements / drawings the LPA should seek further information from the developer to clarify what is proposed and show further details.

D2. Stock proof fence on crest needs to be more than a wooden post & wire fence
The stock mesh fence shown along the north edge of the crest is a key feature which provides the interface for the public between the water and their circular route. It sets the tone for how the embankment edge will look as the public walk or cycle around the site. It should be a statement feature, not just a wooden post and wire fence used around grazing paddocks.

If drawings 0011 & 0018 which show a stock mesh fence are to be approved and the later detailed submission to discharge Condition 28 is proposed to include this, then it is <u>reasonable to expect reassurance</u> at this stage from the developer that this will be <u>more</u> than a wooden post and wire mesh fence, but instead confirm that they will be providing something more substantive and robust, appealing to the eye, which is suitable in this historic and rural setting. For example, it could be bespoke metal railings designed to be stock proof with an element of art intermittently incorporated into the design.

Before approving the drawings the LPA should seek further information (or at least a written reassurance) from the developer as to the design principles for the stock mesh fence on the north side of the crest road to ensure that it will not be just be a wooden post and wire mesh fence typically found around grazing paddocks.
Note; The section drawings submitted describe stock mesh fencing, while some of the landscape drawings refer to post & rail on the key. Post & rail will not be adequate to discourage access to the open water by children and dogs.

D3. Hedge & stock proof fence not shown on the south side of the embankment crest road
Drawings 0011 and 0018 show no fencing or hedging along the south edge of the embankment crest road. This is a major concern as some means of preventing access to the outer grassland embankment slope is needed for the following reasons;

a) To stop people and dogs accessing the wildflower grassland on the southern slope which would reduce its conservation value. Portsmouth Water and their consultants have previously asserted that this grassland will be managed in a way that allows mitigation for lost grassland habitats and breeding habitat for ground nesting birds and reptiles. Any biodiversity value will be significantly reduced if the public can access this wildflower grassland slope, so fencing the slopes as a minimum is essential.
b) The optimum conservation management for this wildflower on the outer embankment grassland would be grazing by sheep rather than mowing, where previous research with specialist landscape contractors indicated the alternative of annual mow and collection of grass on the slopes would be very tricky. Grazing by larger hoofed animals such as cattle and horses would not be permitted by the reservoir engineers. This would also restore the former grazing use of the site, which especially in the Gipsies Plain area was previously grazed by rare breeds sheep from the SCP farm. Grazing would only be possible if robust stock fencing/ hedging were provided to safely contain the animals and keep the public and especially their dogs off the embankment slopes.
   Note: The Landscape Plan (Drg. 0011) shows a brown solid line along the southern toe at the bottom of the embankment but there is nothing on the key to indicate what this solid brown line denotes. The LPA need to seek clarification, but hopefully this is an additional form of stock mesh fencing to prevent public access from the operational access road/ bridleway track onto the embankment.
c) Public access to the embankment outer slope for walking, bikes, sledges etc. could cause erosion along desire lines if not prevented, which would then be exasperated by rainfall runoff. Such use could also create health & safety concerns. Not taking action to prevent this sort of activity on the slopes through intelligent design, to design out foreseeable problems would be short sighted and contrary to the reservoir scheme design principles, especially as this issue was identified at an early stage in the project by both Portsmouth Water and the design engineers as a concern. Early discussions to prevent this centred around provision of a managed hedge and stock mesh fence set back along the south side of the embankment road.
d) Providing a managed hedge cut annually to a height of 1.2m inset from the south side of the crest road would not only help to discourage public access but would also provide a biodiversity benefit, as well as useful protection for walkers & cyclists from the SW prevailing wind. It is also in keeping with the design principle for the embankment staircase, which incorporates a managed beech hedge and would create a more attractive and pleasant recreational route for the public to walk and cycle along the crest.
   Note: While tree planting on the reservoir embankment is not normally permitted for engineering reasons early discussion with the engineers, including the original reservoir panel engineer indicated that a narrow managed hedge line could be permitted inset along the south side of the crest road. Consideration should be given in the embankment design to providing a deeper topsoil line when surfacing the embankment to accommodate the planting of a managed hedge line.

Some form of fencing barrier also needs to be provided at the bottom of the southern embankment slope to prevent dogs, walkers, cyclists and horses using the operational access/ bridleway track from crossing up the embankment slope to the crest road, except at authorised paths up the slope. No such barrier or fence is shown on the Landscape Plan (Drg. 0011) or Landscape Cross-Sections (Drg. 0018) submitted for approval.

Before approving the drawings the LPA should seek further details (or at least a written reassurance) from the developer that a hedge and stock mesh fence (wooden post & mesh) will be provided inset from the south of the crest road, with suitable stock proof fencing also provided at the base of the southern embankment slope and along any access paths that traverse the slope to prevent access by people, dogs, cyclists and horses to the wildflower meadow slope, in order to optimise its biodiversity value, reduce health & safety risks and erosion.

D4. Planned paths not shown traversing the embankment slopes from SCP

The Outline Master Plan (HTR-ATK-ZZ-ZZ-DR-L-001) granted planning consent as part of the original hybrid planning application showed two paths traversing the embankment slopes in addition to the Avenue Staircase within the Planning Application 0011 area, but these are not shown on Drg.0011 (Main Embankment Landscape Plan). These were to allow a connection to established existing visitor routes which would inevitably become desire lines up the embankment once the reservoir is open, They were shown as yellow permissive paths for pedestrian use on the Outline Master Plan in the following locations.

- Up the slope of the SW embankment linking to the existing SCP parkland boundary gate adjacent to the Riders Lane Stream.
- Up the slope of the SE embankment where Cedar Drive exists the SCP woodland.

Enhancing linkage to existing routes is a key design principle set out on page 14 in the Planning Statement for application 0011 where it confirms; "Maintain and enhance public access to the site, optimise opportunities to link to existing walking, cycling and bridleway routes"

Hopefully this is an oversight and there was no intention to delete the paths connecting to SCP. The paths should be shown on Drg. 0011 along with any associated fencing or planned landscape features such as hedgerows.

Note also the comments made at G1 on the revised Outline Masterplan.

E. Objection to having a separate application for a secondary means of access (bridge) to the valve tower

There is a really significant concern among the community that if a bridge is to be provided out to the valve tower then this significantly increases the health & safety risks with children and youths being drawn to try and play on or dive/ jump off a bridge, regardless of whatever signage & security measures are put in place to stop this.

The bridge is not specifically part of these applications. However, the phasing plan submitted to discharge Condition 4 (separate reserved matters application) includes for a later Phase 6 application for the secondary means of access to the valve tower. This is also stated in Section 2.13 of the Planning Statement.

The valve tower and any future means of access such as a bridge are intrinsically linked and **I believe that the LPA's should require full details for the valve tower and any means of access like a bridge needed for access to be submitted now,** together with the current applications so that the public, stakeholders & LPA's all have the opportunity to consider the merits/ concerns about the valve tower in full now.

Note: My concern would be that if the LPA's grant consent for the valve tower now on the assumption that there is no bridge, then there could still be a later application for a bridge. Then PW & Future Water(FW) will argue the bridge is essential for H&S reasons and the LPA's will be left with no choice but to grant permission for the bridge, having already granted permission for the valve tower.

Portsmouth Water /Future Water have known since last summer that they planned to locate the valve tower offshore, so they have had plenty of time to determine if a secondary means of access is required or not. They need to be honest in their approach and tell us now if there will be a bridge.

If they are still not sure then the LPA should take a precautionary approach and the details for a bridge should be submitted now as a worst case scenario so that the visual and H&S impacts can be properly assessed **before** any consent for the change now submitted to include an offshore valve tower is granted.

F. Other comments

F1. Width of crest road likely to be too narrow to avoid user conflict; The width of the crest road shown on the drawings is not labelled, but is indicated somewhere to be only 4m wide. The road will be for use by Portsmouth Water operational vehicles, walkers, families, mobility scooters, wheelchairs and cyclists, as a multi user recreational route. The crest road will be a very popular and busy route and the narrow width is likely to lead to conflicts between users, including Portsmouth Water operation vehices. Engagement with other water company reservoir managers recommended a width for such a multi-user route of 6m, with some suggesting a 10m width was necessary. South East Water have been upgrading the width of multi-user routes around one of their reservoirs due to conflicts between different user types to allow more separation.
The width of the crest of the embankment is being fixed by this application. The LPA need to consider if a 4m wide road/ track is acceptable for the busy multi user route proposed, especially given the advice of the experts who already manage such facilities. If 4m is not enough to be safe, the crest of the embankment will need to be widened to accommodate a wider track..

Note: Additional infrastructure, barriers and bollards will be needed to slow down bikes on the crest road. This level of detail must be provided with the next Reserved Matters application for discharge of Condition 28, showing how this can be done in a sensitive way that blends into the historic rural landscape.

F2. No detail provided on embankment toe & other drainage nor where it will drain to?
The embankment will include filter drains and toe drains, the latter are likely to be visible at the surface. No detail on the drainage features or where they will drain to is provided?
Main Embankment Cross-Sections Drg, 4003 confirmed the presence of a chimney drain, but no indication as to where that drains to?
There is also no detail of the cut off wall and drainage provisions to prevent seepage into the Bognor sand formation in the SW area of the embankment, where there is also an existing spring line which will be impacted. What impact will this have on water levels in the sandstone and natural drainage provided by the existing spring line in this area? Could there be any change in groundwater level or flow?
Note: I queried this in comments on the proposed changes to Portsmouth Water sent 17/2/24 indicating that these issues need to be covered in an engineering statement submitted with the application. The Eng. Report submitted with application 12 does not cover these issues.
What provision will be made for drainage in the steep valley created where the embankment structure joins the contours of the existing ground in the SW? New valley visible on Drg.4002, Main Embankment Proposed Site Layout. Is there an opportunity to soften the contours in this area to make the valley less steep?
Given the impact of the changes to the original design, the LPA need to give consideration as to whether further detail should be provided with the current Reserved Matters (11) & Section 73

application (12) on drainage impacts. If not, when will the updated details for drainage be provided to the LPA?
Note; Further comments on the ES Addendum 2024, Section 14 Water are provided in Appendix D, on page 52.

F3. Phase 3 Ecological Mitigation, Compensation and Enhancement Report missing?
Page 7 of the Environmental Statement of Conformity refers to a Phase 3 Ecological Mitigation, Compensation and Enhancement Report which was not available to download from the planning portal when I downloaded the other documents.

The LPA need to obtain and publish a copy of the missing report.

Note: Page 7 of the Planning Statement for application 11 suggests that this report is to be provided at a later date to discharge Condition 36, so conflicting information provided.

F4. Feedback on the Planning Statement (April 2024) - Concerns

In addition to relevant feedback on statements made in the Planning Statement and queries already set out above, I would make the following further comments on the planning statement submitted with application 11.

a) **Discharge of planning conditions – note feedback already provided**; Section 1.20 refers to separate applications being made to discharge planning conditions relevant to the Phase 2 to 8 works. Separate comments have been provided to the LPA in relation to these separate applications;
   - Condition 5 – Construction Environment Management Plan (14/5/24)
   - Condition 9 & 10 - Construction Noise & Vibration (6/5/24)
   - Condition 12 – Construction Traffic Management Plan (11/5/24)
   - Condition 27 – Arboricultural Impact Assessment (6/5/24)

b) **Inadequate lighting strategy during construction**; Section 1.21 indicated that no permanent lighting is proposed as part of Phase 2 or 3, so no details need to be submitted. However, there is an application to extend the length of the working day for the embankment works into the evening for 4 years, which will require additional lighting during construction. This is not mentioned. The embankments construction zone for large parts of the site will take place within 15m of ancient woodland or important mature tree lines and as a result there could be a significant adverse impact on the night time ecology and the commuter routes of bats from construction noise and lighting.
   As indicated in my response to the LPA relating to the proposed change of hours dated 6/5/24, if working in these sensitive areas close to woodland/ mature trees is not to be limited to day light hours, then a restriction on working within 50m of the woodland should be applied outside of daylight hours.
   My response to the LPA's dated 14/5/24 on the Construction Environment Management Plan (CEMP inc. lighting strategy) during construction for the separate reserved matters application (009) also highlighted the need for the construction lighting strategy to be more robust and properly monitored.

c) **Disagree with conclusion regarding no significant environmental impacts**; Section 4.7.9 of the Planning Statement suggests that there are no significant environmental impacts associated with the revised embankment design, nor any need for additional mitigation or

compensation. I disagree with this conclusion. There are significant impacts with no proposal for mitigation or compensation.

- The movement of the valve tower to an offshore position will have adverse impacts on visibility and views around much of the reservoir site, but certainly from designated viewpoints such as the western viewpoint, Avenue Staircase Viewpoint and Visitor Centre. Urbanising the views and making it obvious this is not a natural landscape, contrary to the design principles to make the reservoir blend in to the historic landscape. The adverse impact of this cannot be mitigated unless the offshore location for the valve tower is rejected and changed.
- Permanent loss of stream length in the SW below the embankment for which no mitigation is proposed.
- Permanent loss of wet grassland habitats and the loss of area available to mitigate to create enhanced priority habitat along the stream edge (see B1).
- Increased visibility of the Control House and associated high compound walls due to the reduction in the embankment slope angle and loss of screening benefit due to increased distance from Round Wood.
- Important paths linking the reservoir crest path to SCP have been removed from the embankment drawings.

Other direct or indirect impacts may also be identified when more complete information is supplied to the LPA. At present key details are lacking.

For the same reason I disagree with conclusion of the 'Environmental Statement of Conformity' which claims that the Phase 3 Embankment design submitted for Reserved Matters approval does not give rise to any new or materially different effects (Planning Statement Section 5.8)

Further detail on concern with respect to unsound assumptions & statements in the ES Addendum 2024 assessment submitted with application 12 are set out in App D (page 49 to 54)

F5. Feedback on the Env. Statement of Conformity (April 2024–HTR-RHD-ZZ-ZZ-RP-Z-0002)

a) **Historic environment Impact – disagree no impact or change in significant effects on the heritage assets.** Moving the Control House north away from Round Wood and changing the angle of the embankment slope is a significant change in that area which will have a negative effect on visibility of the Control House from The Terrace and the Conservation Area. As will moving the valve tower to offshore significantly increase its visibility (see A1, C1, C2, C5, C7, C8). These changes to the original design serve to urbanise the sensitive ancient woodland landscape and historic park setting, detracting from the natural landscape, instead of blending in more in accordance with the original intelligent design principles. It will now be obvious it is a reservoir, not a natural lake.

b) **Noise & Vibration – disagree no change.** The text suggest that there will be no change to the assessment during construction or operation, but residents at Winterslow Drive will be closer as a result of the SW embankment having moved further south (up to 60m). The ecological impacts of the changes have not been assessed. For futher detail regarding the concerns refer to my feedback in relation to Condition 9 & 10 sent to the LPA's on 6/5/24. Note: The ES Addendum 2024 does not assess the impact of the SW embankment moving further south (see App D, Section B, page 49)

c) **Biodiversity – disagree with assessment.** There is no recognition in the text that the embankment moving south in the SW will result in further permanent stream loss and

restrict the area available for creation and enhancement of priority wet grassland habitat, as was originally proposed. No additional mitigation or compensation is proposed for the additional loss.
Opportunities for tree planting to provide mitigation screening in the Round Wood area are not identified, but these could have biodiversity benefits, C1 above refers.
Note: The ES Addendum 2024 does not consider these impacts. See Appendix C.

d) **Landscape & visual – disagree with assessment**
The report acknowledges that the detrimental visual impact would be extended by 2 years for the revised Phase 3 construction, which is significant in this sensitive ancient woodland and historic park landscape.
It is claimed that "the relocation of the valve tower would be a local modification limited to a small area of the overall reservoir footprint. The overall effect would be no change." I completely disagree with this statement. The tower will be highly visible from the important new western and Avenue Staircase view points, and much of the southern and western crest path. It will also be visible from the visitor centre, northern shore hides/ view points and the eastern crest path. Page 66 of the ES Visual impact assessment confirmed the valve tower will be visible from the NE, presumably this would include from the upstairs views from properties on Manor Lodge Road, Rowlands Castle. With the railings on top of the tower rising to 1.8m above the adjacent crest path the visitors eye will be drawn to this new anomaly in the landscape, even from a distance, serving to urbanise the views and make it obvious that this is a man-made reservoir and not a natural lake.
No new mitigation is proposed for the impacts of the valve tower moving offshore, and none is possible to offset the impact of this significant and unwelcome change in the design.
As indicated in C1 the change in the position of the Control House (upto 6m high) and high ancillary compound wall, along with the change to a gentler slope, will also have adverse impacts from key view points for which no mitigation is currently proposed. Mitigation by local changes to the embankment slope and additional planting to increase the tree screen should be proposed.
Note: The ES Addendum 2024 does not adequately assess all of the Landscape & Visual Impacts (see Appendix B).

e) **Population & Human Health assessment – disagree, mitigation should be proposed for the confirmed impact**
The text on page 8 acknowledges that impacts on human health could arise during construction from the reduction in access to the site, and that the changes to the embankment design **will extend the time period for restricted access by a further 2 years**, which **<u>would</u> have an adverse effect on the local population**. This is not mitigated by the diversion of some access routes, as many routes have been permanently closed, including the very popular and attractive woodland Avenue path, which provided a safe countryside route from Warren Park into the heart of the SCP.

Further information on the impacts set out in the ES Addendum 2024 and why mitigation action is required is provided in new Appendix D (item G on page 52). Where there is also a proposal for mitigation action to improve access for local residents and dog walkers.

Now that it is known that impacts on human health <u>will</u> be extended beyond the original programme completion date of 2029 by a further 2 years, the LPA should require that Portsmouth Water provide an enhanced safe path link between Memory Park in the SW of the site to the SCP parkland, to allow improved and safe access for families and the less able

to the excellent facilities within SCP, where necessary working with HCC to achieve this, to mitigate the existing and future impacts of loss of paths over the next 6 years. The path should only be closed when essential to allow the new pipeline to be constructed, which should be kept to as short a period as possible.

The LPA should require mitigation action for the longer period of construction restricting access to the community by including provision of an enhanced safe path between the Memory Park area (Warren Park) and Staunton County Park.
The proposed improved access to restore a route in and out of the west side of the site should also be progressed.

f) **Traffic & Transport assessment of change – unlikely to be sound**
There is no indication that the proposed change in working hours has been considered as part of the revised assessment. The significant change in working hours at the site will have a knock on effect to the traffic movements generated by construction. Workers on site and in the office will start and finish later as a result of the change.

There is an acknowledgement that the transport assessment recognised the need to import greater quantities of aggregate and sand, but **no reference to the need to import significantly more Enkamat A20 or rock rip rap** due to the gentler embankment slopes, nor more concrete due to the presence of a longer culvert through the wider embankment. As a result, it is highly unlikely that there would be no significant change in effects is the correct conclusion.
Further information is provided in Appendix D, page 50 & 51 regarding deficiencies in the ES Addendum 2024 assessment.

g) **Material Resources assessment of change – unlikely to be sound**
Once again there is an acknowledgement that there will be a need to import greater quantities of aggregate and sand, but no reference to the need to import significantly more Enkamat A20 or rock rip rap due to the gentler embankment slopes and the extension of the embankment length by 60m in the SW and 60m in the east (120m in total). For example, in the ES addendum submitted with application 12;

- Pdf page 35 suggests that the same amount of rip rap is required as per the original design.
- Pdf page 123 does not confirm increased volumes.

Nor of the need to make and import more concrete due to the presence of a significantly longer culvert through the wider embankment. **As a result, it is highly unlikely that the conclusion that there would be no significant change in effects is correct?**

There is no indication as to where the Enkamat A20 or rock rip rap will be imported from so the significance of the impact of increased volumes of these materials on transport, sustainability compared to other alternatives, or climate change impacts is not clear.

h) **Water assessment – unlikely to be sound**
There is no acknowledgement that more of the Riders Lane Stream feeder channel will be lost under the SW embankment extension. The conclusion that no additional mitigation would be required would seem suspect.
Nor is the added loss of stream edge habitat available mentioned to create replacement enhanced wet grassland habitat as proposed in the original mitigation strategy?

No reference to the longer embankment in the SW and need for a longer cut off wall to the Bognor sand formation, or the impacts that could have on the existing spring line in that area, or potentially on groundwater levels/ flows? This could have an ongoing impact during the operational phase of the reservoir.
Note; Further information on the inadequacy of the ES Addendum 2024 water assessment is provided in App D, page 52.

i) **Climate assessment – unclear if all changes considered?**
The text on page 11 indicated that the assessment of additional emissions considered which were not in the 2020 ES assessment would result in an increase in construction emissions of 7%, which is not deemed to be material, or likely to have a significant effect on climate change.
It is not clear if they have taken into account;
- Increased length of the embankment in the SW and East (120m total)?
- Increased amount of Enkamat A20 or rock rip rap to be imported/ placed?
- Increased manufacture and placement of concrete for the longer culvert?

j) **Statement of Conformity Conclusion – disagree**
Page 12, Section 4 (26) states that the report concludes that the Phase 3 design submitted for Reserved Matters approval does not give rise to any new or materially different effects to those reported in the ES2020 or ES Addendum 2024.
Given the uncertainty in the assessments and conclusion set out for each element above(& in App D) further information is needed to substantiate this conclusion.

Other direct or indirect impacts may also be identified when more complete information is supplied to the LPA.

The LPA should request a more robust assessment of the impacts and an Updated 'Statement of Conformity' which addresses all of the changes which will result from the revised embankment design and introduction of an offshore valve tower.

G. Objections to & concerns about design changes shown on the application 12 drawings

I have significant concerns about a number of the design changes shown on the drawings submitted as supporting documents to application 12, these are set out under the relevant drawing numbers below.

G1. Drg.0001 – S73 Reservoir Outline Masterplan

There are some very significant changes to the design from that shown on the approved hybrid application Outline Master Plan. I **object to the following changes to the design**.

a) **Inclusion of an offshore valve tower;** (see A1 above for reasons), which is surprisingly not shown on Drg.0001, presumably that is an error as it does form part of the S73 application.
b) **Crest road terminating in the eastern boundary path**; while it is appropriate for the embankment crest path to be used by walkers and cyclists to terminate in the eastern boundary path, it is not appropriate for operational vehicles because the path is too narrow to be safe for vehicles and other users. Alternative provision needs to be shown for operational vehicles to safely leave the crest road and turn to return west, as was originally intended.
c) **Embankment toe road terminating in the eastern boundary path**; while it is appropriate for the embankment toe path to be used by walkers, horses and cyclists to terminate in the eastern boundary path, it is not appropriate for operational vehicles because the path is too narrow to be safe for vehicles and other users. Alternative provision needs to be shown for operational vehicles to safely turn and return west, as was originally intended.

d) **The removal of a key path in the SW**; the path shown on the hybrid application Outline Masterplan linking the SCP parkland gate adjacent to the Riders Lane stream to the embankment crest path has been removed. This is not appropriate and the path should be replaced, set back to the east of the stream, and running up the SW embankment. This is an obvious desire line from the SCP parkland area and the path needs to be formalised along a designated route shown on the plan, otherwise uncontrolled desire lines will develop through the wet grassland which is an important mitigation habitat where disturbance by people must be minimised. The provision of the missing path is also essential to provide safe connectivity to allow people/ families walking in the SCP parkland to transfer safely via the stream bridge on the operational access road/ bridleway into Memory Park and onto Warren Park or the Visitor Centre.

e) **The visibility of the Control House and ancillary yard**; The Control House is shown as a much more prominent and visible structure in the landscape. This is because the footprint area of the building has been increased, and the embankment slope has been reduced, exposing more of the structure. Further work on the embankment design is needed in this area to amend the slope gradients locally to hide as much of the building as possible. This is especially important at this location on the boundary of the historic Conservation Area.

f) **Position of new permissive path through trapezoid woodland in the east not appropriate** ; A new path (yellow dashed line) is shown entering the site with a gate off Swanmore Road. The path is shown traversing through the existing northern trapezoid woodland block which would require the removal of additional trees and will have unnecessary and negative biodiversity impacts. The path should be relocated to the position of the existing farm gate, currently used as the access to the temporary compound, to avoid the need to cut down any more trees and breach the western wildlife corridor. The new path should be available to walkers and cyclists.
***Note**: If the path is intended to be a link from the existing bus stop into the reservoir site then it should be shown entering the site where there is just a narrow width of existing bramble vegetation and no woodland (see also comments at G3a below)*.

I would also make the following observations about the revised Outline Masterplan which need to be addressed and the plan resubmitted before the application is approved. Noting that there has been no discussion with the Stakeholder Access Sub Group, or Recreation Sub-Group about the layout for the new network of paths/ roads within the reservoir site shown on this revised Outline Masterplan.

i) **Water course missing in the east**; The new watercourse which forms part of the mitigation measures for loss of streams at the site is not shown in the east between the toe of the embankment and the Phase 1 advanced planting area. This should be added to the drawing.

ii) **Part of phase 1 advanced planting is missing**; The area of advanced tree planting planted in 2019 between the new woodland corridor and the boundary footpath is missing and should be added back in. It is not acceptable to remove the planting which forms an important part of the new eastern wildlife corridor introduced to help mitigate for the loss of connectivity previously provided by the Avenue woodland peninsula (now felled).

iii) **Operational vehicles using the eastern boundary path**; it is not clear if it is intended that operational vehicles would be able to leave the embankment crest & toe roads and exit via the existing HCC access gate onto the Manor Lodge Road/ Whicher's Gate roundabout at Rowlands Castle. This would not be appropriate as the existing boundary path is narrow with blind bends, is a heavily used multi-user path where multiple paths converge (including the permissive new circular bridleway route), and it is constrained in width by vegetation which cannot be removed because it forms part of the vital connectivity for the eastern wildlife corridor. A safer mechanism must be provided for operational vehicles leaving the embankment crest & toe roads to turn and return to the west. Assurance was previously given at the hybrid application stage that a turning circle would be provided to allow vehicles to return to the west.

iv) **Western embankment crest and toe paths terminate with no connection;** The western embankment crest & toe paths cannot just terminate at the north end of the embankment. These routes will be used by walkers, cyclists and operational vehicles. A connection must be added to show how these key new routes will connect safely into the new path/ road network.

v) **Bridleway cutting through scrub in the west is not appropriate**; to the NE of Swanmore Road the bridleway is shown cutting through trees and scrub, which is not appropriate. The trees and scrub form an important part of the western wildlife corridor which is already weakened in this area by the addition of the southern access road. The purple bridleway line should be removed, or shown to the east or west of the existing trees/ scrub.
Note: The text on Drg.0003 suggests that the; "Existing bridleway 121 to be stopped up in this location" (i.e. south of the southern access road junction). I assume that means that this section of the bridleway, which does not reflect the current layout on the ground is to be removed from the public paths record by Portsmouth Water and formerly replaced with the new bridleway layout. If this is the case this redundant section of the purple line should be removed from the new Outline Masterplan.

vi) **Landscape general arrangements shown are not clear**; For example,
- What is the darker green area at the toe of the NE embankment, between the toe and the existing eastern boundary path? Is it additional tree planting? If so, this would be welcome to help reinforce the narrow pinch in the eastern wildlife corridor in this area. Clarity should be provided on this constrained area to show how the new embankment alignment will be delivered alongside the merging of new and existing paths, while providing additional tree/ scrub planting. Ideally existing scrub that already exists in patches here would be fenced off and retained.
- What is the dark green fringe line shown at the toe of the embankment? Does this just denote the bottom of the embankment, or is it a hedgerow?

vii) **Wetland layout issues;** The comments made in response to the wetland planning application (HBC APP/24/00186 & EHDC 51680/008) by email on 22/4/24 are also valid to the details shown for the wetland area on this new outline plan. Including concerns about the orientation of the ephemeral shallows in the NE not following the design principles, hide/ viewpoints locations not being optimised or adequately screened, noting in addition that the binocular symbol shown in the NW should be positioned adjacent to the education hide (not in the woodland fringe where a view point would not be appropriate adjacent to the recreation hub).

viii) **Layout of the NW recreation hub is not appropriate;** The layout shown in the inset box for the NW recreation hub is not appropriate, but my understanding is that it does not form a part of this application. At the hybrid planning application stage myself, wetland specialists, other stakeholders and members of the community **objected to the Visitor Centre being shown as an offshore island or pier, due to concerns about multiple adverse impacts on the wetland and reduction in biodiversity net gain.** These objections remain and Portsmouth Water gave an assurance that the location would be reviewed and that stakeholders/ objectors would have the opportunity to be involved in the development of the location and layout of the visitor to ensure that concerns were addressed.

G2. Drg. 0002 – Access Routes – Vehicle Access Route South, Sheet 1 of 1 (Status Unclear?)

It is **not clear** if this drawing is submitted for approval by the LPA with this application, or whether it is simply submitted for information as this stage. It is listed as a 'proposed' drawing in the ES Addendum 2024 on page 9. There is no reference in the Planning Statement to seeking approval for the southern access road or junction, and Drg. 0021 Planning Strategy Key Plan does not show an outline or detail box for the area of the southern access road.

It is important to note that the **details for the southern access road have not yet been consulted on by Portsmouth Water**, I understood that a consultation workshop was due to take place later in 2024, so the submission of this document is a worrying development.

I wish to **object** to the proposal shown on the sections at the bottom of Drg. 0002 to make this a 6m wide two way carriageway. **A road of this size is completely unnecessary and I object to the inclusion of such a wide southern access road** for the following reasons.

- This is not the main access road to the site. The main access road post construction is to remain as the northern access road, which is a narrow road (3.65m) with passing places. If a single lane road with passing places is suitable for the northern main access, which is to take the bulk of the visitor traffic, then it should be perfectly acceptable for the secondary southern access and a wider road than 3.65m is not necessary.
  Note 1: The northern access road granted planning permission is a single lane, 3.65m carriageway with passing places.
  Note 2: The community have always expressed concern that the southern access would become a main access point if it was made wider, rather than just being a route made available for local traffic (dog walkers etc.). Making the road so wide when it is not necessary adds to that concern. The dual 6m wide road is not necessary to accommodate emergency vehicles, as if the southern access road were to be blocked by a vehicle emergency vehicles can use the adjacent operational access road.
- A wider road will encourage vehicles to travel faster than a single lane road with passing places, adding to safety concerns for residents and visitors using the site. Drivers are naturally more cautious about there speed on a single lane road. The proximity of the road to the busy NW visitor hub and Warren Park adds to the safety concerns.
- Having such a wide road in addition to the adjacent operational access toe road (and crest road) urbanises the site to an unnecessary extent, with much of the western boundary area now taken up by road surfacing.
- The proposal submitted is not in keeping with the design principle for new infrastructure of ensuring the design is 'sympathetic too and blends in' with the sensitive ancient woodland and historic park landscape. Nor does it 'maintain and integrate with the rural landscape character and woodland setting', limiting structures and ancillary clutter.
- It does not minimise environmental and climate impacts, as a wider road than is necessary increases the volume of materials needed for construction, energy consumption etc. and therefore has a more significant adverse impact. Opportunities for a more sustainable narrower design have not been optimised.
- It does not minimise whole life costs (as per the project design principles) as a wider road will cost more to construct and maintain.
- Events traffic might be more inclined to use the southern access if it is wider than the northern access, as people will perceive at busy times that it is easier to gain access or leave an event via the wider road, which is contrary to the intended travel plan. Having a wider southern access sends out the wrong message to site users/ visitors travelling by car.
- There has not been appropriate or adequate consultation on this significant design element with community and environmental stakeholders. At the time of the hybrid planning application many expressed objections to the potential for a wider road, making it clear that the southern access should be a single carriageway road with passing places, as was the case for the northern access.

The LPA's should not approve Drg.0002. If the LPA's are minded to approve the S73 application they should **make it clear that the proposal for a 6m wide southern access road, even in outline, does not form part of any consent granted**.

Other comments and concerns with respect to Drg.0002 for the southern access road are set out below.

a) The embankment crest road and toe road are shown ending abruptly, with no linkage or connectivity to other paths or roads? The western embankment crest & toe paths cannot just terminate at the north end of the embankment. These routes will be used by walkers, cyclists and operational vehicles. A connection must be added to show how these key new routes will connect safely into the new path/ road network.
b) Where the western embankment thins to almost nothing to merge in with the existing ground levels no screening planting is proposed. Early design workshops identified that there would be a need for screening to be planted where there was effectively no embankment to ensure that vehicles using the southern access road were not visible from the southern and eastern crest path, as that would add to the urbanisation of the landscape. A managed hedge needs to be added to the drawings to show that the intent is to screen the road from wider views across the water, at least where there are gaps in the embankment and cars using the southern access would be visible.
c) No gates or barriers are shown at the entrance to the southern access road to enable the access to be closed at night. As a minimum, Indicative locations for barriers and fencing to help prevent anti-social use of the site at night should be shown, along with fence/ barrier locations to prevent motorcycle access.
d) The redundant existing section of bridleway 121 south of the southern access junction should be removed from Drg.0002, or the detail made clearer that it will be redundant.
e) The arrow for the new pedestrian & cycle track pointing close the existing bus stop south of the junction is suggesting the path will be within the existing trapezoid woodland. As indicated for G1g above & G3a below this path should not be routed through the existing woodland.

The LPA should request a revised drawing 0002 for the southern access which shows a single carriageway with passing places, and the issues set out above addressed.

G3. Drg. 0003 – Southern Access Road Junction with Swanmore Road (Status Unclear?)

It is not clear if this drawing is submitted for approval by the LPA with this application, or whether it is simply submitted for information as this stage. It is listed as a 'proposed' drawing in the ES Addendum 2024 on page 9. There is no reference in the Planning Statement to seeking approval for the southern access road or junction, but Drg. 0021 Planning Strategy Key Plan shows the junction area as a blue box which on the key is said to indicate 'detail planning permission'.

I have the following comments to make on Drawing 003.

a) A new access path is <u>not</u> shown from the junction to the existing bus stop to the south. I thought that this was required, a label for the path is shown on Drg.002. The path should be added to Drg. 0003. *Note: If the yellow dashed path shown on the Outline Masterplan east of Swanmore Road is intended to be a link from the existing bus stop into the reservoir site then it should be relocated to avoid the loss of further existing woodland, to where there is just a narrow width of existing bramble vegetation and no woodland. Drg.0001, 0002 & 0003 should be updated to show the correct detail to demonstrate that the existing trapezoid woodland block and western wildlife connectivity corridor will not be adversely impacted by the introduction of this new path.*
b) The text on Drg.0003 suggests that the; "Existing bridleway 121 to be stopped up in this location" (i.e. south of the southern access road junction). I assume that means this section of the bridleway, which does <u>not</u> reflect the current layout on the ground is to be removed from the public paths record by Portsmouth Water and formerly replaced with the new bridleway layout. If this is the case this redundant section of the purple line should be removed from the Outline Masterplan as indicated at G1v above.
c) No gates or barriers are shown at the entrance to the southern access road to enable the access to be closed at night. As a minimum, indicative locations for barriers and fencing to help prevent anti-

social use of the site at night should be shown, along with fence/ barrier locations to prevent motorcycle access.

The LPA should seek clarification of the details raised above for Drg. 0003.

G4. Drg. 0004 – Landscape Plan Control House (Outline Permission)

This drawing is submitted for outline consent and there will be a later detailed application. However, the S73 planning application makes changes to the location of the Control House (moving north), the slopes around the embankment, as well as increasing the footprint area of the building. These are material changes which also have an adverse impact on landscaping elements of the design.

I object to the relocation of the Control House and associated walled courtyard north, the reduction in embankment slopes around the structures and the increase in the size of the footprint, unless further information is provided to mitigate the adverse impacts on increased visibility of the structures. This can be achieved by;

- Increasing / adapting the embankment slopes locally around the Control House and walled courtyard to restore improved screening of the structures.
- Providing additional planting to improve screening of the Control House and walled courtyard from the historic Conservation Area alongside, from the Grade II listed Park & Gardens and from Memory Park.

The LPA should seek a revised Drawing 0004 showing how the mitigation of the visual impact of the significant changes to the design could be achieved for the proposed larger Control House and walled courtyard footprint, before any outline consent is granted to establish the principle of how additional mitigation would be delivered.

I have the following comments to make on Drawing 004.

a) Compared to the original hybrid application Landscape Plan for the Control House area, you can see that not only is the Control House building footprint much larger, but so is the area of the walled courtyard. Further clarification should be sought on the increased area needed for the high walled courtyard.
b) No local modification is shown to the gradient of the embankment slope (1 in 9) around the Control House and high walls of the courtyard. The gentler gradient proposed in the S73 application for the embankment slopes means that much more of the structures will now be visible, rather than being hidden by the previous 1 in 5 slope. Action needs to be taken to locally steepen the slopes around the Control House to ensure that they are more hidden, while still being done in away that leaves the slope looking as natural as possible.
Note: That this change need not alter the engineering structure of the embankment, it merely requires the addition of more clay or soils to locally alter the shape to enable the control House to blend into the new landform and be as hidden as practical.
c) The proposed parking area for operational vehicles adjacent to the Control House is not shown. A proposed grasscrete area north of the operational access road was shown on the hybrid application design. The parking arrangements for operational vehicles that will need to visit the Control House daily should be provided.
d) The toe drain at the base of the embankment is not shown. Is it expected to visible?
e) It is not clear that railings and other security infrastructure will be needed around the Control House and walled courtyard area to prevent access by the public to the roof and courtyard. While the detail will be subject to further design, as this will impact what is visible in this sensitive part of the landscape some indicative information should be provided as to where these structures will be needed and how high they will be.

f) There is an open channel south of the building shown on the drawing, but what is not clear that is that additional hard infrastructure will be needed at the north end of the channel to prevent access up the pipe(s) that feed into the channel and potentially to reduce flow rates/ erosion. The applicant should provide some notes on the drawing as to the additional infrastructure that will be needed in this area. For example, will an additional building or visible tank be needed in addition to the steel screens?

g) Some of the landscape detail shown on the drawing remains unclear.
   - What is the darker colour strip shown at the toe of the embankment? Is this a landscape feature, or does the darker shading just depict the toe of the embankment?
   - Is there an opportunity to provide a hedge south of the toe of embankment to help break up views to the structure and provide some biodiversity benefit?

The LPA should require additional details to clarify what is proposed and ensure that the issues raised above for the Control House area are addressed.

G5. Drg. 0005 – Landscape Plan Avenue Staircase (Full Permission)

The steps have been made longer to traverse the wider outer embankment footprint, but otherwise are largely similar to the original outline design concept submitted with the hybrid application. The **Landscape Plan for the Avenue Staircase (Drg. 005) is submitted for full permission, but lacks some important details.**

The base of the steps will mark a busy intersection between the existing Avenue path within SCP and the new reservoir landscape, it will be used by families and the elderly. The path and steps are expected to be heavily used as this will become the main access route between SCP and the reservoir. As this is drawing is submitted for full permission **additional details should be shown**.

a) **Ancillary infrastructure not shown**; The interface between the SCP Avenue Path and the staircase coincides with the operational access road to be used by Portsmouth Water & ranger vehicles. The road will also be the new public bridleway and a cycle route providing a circular route around the reservoir. It is clear that to make this crossroads interface safe will require the addition of fences, gates, barriers etc. With intelligent design also being needed to slow down cyclists at this busy junction/ crossroads. There is no recognition of this on the drawing 0005 submitted with application 12. **Given that this is a detailed design drawing for which full permission is sort it is reasonable to expect the necessary infrastructure to be shown** at least in an indicative way. This should include any fencing to be provided around The Avenue peninsula woodland stub, as the temporary construction fencing will need to be removed and replaced with something, which takes account of;
   - This being a boundary of the Grade II listed Park & Gardens.
   - Controls the busy interface between the ancient woodland and the operational access road.

   Note: The need for additional fencing and gates to be provided at this busy intersection has previously been raised by the Stakeholder Access Sub-group.

b) **Provision of seating;** The circular viewpoint at the top of the steps will be a key stopping off point on any journey around the reservoir, providing an opportunity for a break and to take in the views. The drawing currently **makes no provision for seating or benches**. Families the elderly and general visitors will need a place to rest hear and **seating should be provided** and shown at least indicatively on the drawing. The location of the seating needs to take into account that views are to be available over the water, but also over the top of the SCP woodland.
   There was also a previous suggestion that some seating would be provided on some of the tiered grass banks, available for visitors to use as they climb the steps. Is this still to be provided, as it is not shown? The Design Specification submitted in support of the application on page 16 refers to 'rest spots proposed on the south slope'.

Note: Seating is shown on the drawing for the Western Viewpoint, it must therefore be reasonable for it to be shown on the Avenue Staircase viewpoint.

c) **Interpretation panels;** The supporting information to the application confirms that the area will be used for interpretation of the new and historic landscape. No provision is currently made on the drawing for where that signage/ information may be provided. As a minimum indicative locations should be shown to illustrate the intent.

d) **Materials specification unclear;** While the key provides some details on the use of appropriate materials such as limestone walls, the Design Specification submitted in support of the application on page 16 referred to flint cladding. Flint being a local material used in building and wall construction in the area. Hopefully it is still intended that flint will be incorporated into the design to give a sense of local heritage, in addition to limestone which is used in the steps of The Terrace structure remaining within the historic park & gardens. As the application is seeking full permission for this drawing additional information should be added to the drawing indicating where/ how flint cladding will be used.

e) **Type of fencing;** The key suggests that the fencing on the north side of the crest road will be post and rail. This is contradictory to information shown on the section drawings, where the fencing is described as stock mesh to make it harder for the public, especially children and dogs to access the water. The drawing detail should be updated to provide consistent information on stock mesh fencing.

The LPA should require additional details to clarify the details set out above before giving full consent for the Avenue Staircase Landscape Plan.

G6. Drg. 0006 – Landscape Plan Gipsies Plain (Full Permission)

The details provided on Drg. 0006 for Gipsies Plain are not adequate to show all of the key details, nor understand how visitor routes along the eastern side of the reservoir site will operate.

I object to the grant of full permission for the Landscape Plan for Gipsies Plain, the drawing submitted does not cover a wide enough area to demonstrate how the multiple converging visitor routes and landscape proposals will work in conjunction with the revised S73 embankment layout, and is missing important details.

a) The embankment has been extended by 50 to 60m to the north, but the new Drawing 0006 does not incorporate the key area of change to show how the changes to the embankment footprint and slopes will impact (directly or indirectly) the eastern wildlife corridor, and provision of safe multi user eastern path which is safe for pedestrians, cycles and horses. A revised drawing should be provided that also covers the area north beyond the new extended position of the embankment.

b) The termination of the embankment crest and toe road in the narrow eastern boundary path is not shown. A revised drawing needs to be provided which extends far enough north to cover this critical area where multiple multi user paths merge into a very narrow path.

c) No vehicle turning head is shown to enable operational vehicles leaving the embankment crest or toe road to turn safely and return west. The path configuration shown on the revised Outline Masterplan suggests that vehicles will have to exit via the narrow and busy multi-user eastern boundary path. That is not acceptable. A more intelligent design should be developed which allows Portsmouth Water operational and ranger vehicles to turn safely and return west.

d) The new open water course to be provided between the toe of the embankment and the phase 1 advanced planting woodland corridor is not shown. This new reach required is part of the mitigation for streams lost at the site and how it will be provided safely, and connect into the eastern boundary ditch without the loss of further trees should be shown on the drawing.

Additional comments on action needed in relation Drawing 0006 are set out below.

e) The width of the new crest road, toe road and existing paths should be labelled to ensure the reader can consider the implications for safe movement of visitors around the site and better understand the conflicts that might arise if the paths are too narrow to accommodate multiple types of user, especially at junctions where paths merge.
f) The fence on the west side of the crest road is indicated to be post and rail. Elsewhere on the cross-sections the crest road fencing is indicated to be stock mesh, which would be better in discouraging dogs and children from trying to access the water (see D2 on page 17).
g) No fencing is shown on the east side of the crest road to discourage access to the embankment slopes by walkers and bikes. This will result in uncontrolled recreational use of the slope and erosion of the embankment surface (see D3 on page 17).
h) Trees are missing from the SW end of the Phase 1 advanced planting woodland corridor. I assume that is just an error and that the trees planted to create a wildlife corridor are not to be removed. All of the Phase 1 advanced planting areas should be shown on the drawing.
i) Not clear what measures would be taken to slow down bikes, scooters etc when dropping down the embankment slope from the crest road onto the T-junction with the eastern boundary path. Nor to show how they will be slowed down on the eastern boundary path that includes blind bends. The existing path is not wide enough for multiple users such as a family with buggy and a bike to pass each other safely, especially if the bike is moving at any speed.
j) A new horse friendly vehicle barrier gate is labelled at the field entry into Gipsies Plain on the east of the map, this new barrier is shown in the wrong place. The farm gate should remain at this location and the barrier should be placed to control access along the boundary path to the north, which runs to the rear of the properties at Manor Lodge Road, as horses are not to be permitted along that section of the path, but occasional vehicle access will be needed for landscape maintenance of the path and hedges.
k) The hedges that were planted along the Gipsies Plain field fenced boundary as part of the advanced plant in 2019 have established well but are not shown on Drawing 0006. The hedges should be added as they are an important landscape feature that need to be maintained.

The LPA need to reject the Gipsies Plain Landscape Plan (Drg.0006) and request a revised plan that shows all of the correct details, including for the area to the north where the eastern embankment is to be extended by up to 60m, and there could be direct and indirect impacts on other ancillary infrastructure and landscaping.

G7. Drg. 0007 – Landscape Plan Viewing Platform (Outline Permission)

Certain aspects of the Landscape Plan for the eastern viewing platform could be improved and additional details could be shown that would improve the value of the area for visitors, education and to make it more multi-functional.

a) Part of the design concept for the western viewpoint was to include a grass amphitheatre which is currently shown as a very small grass seating area to the SE of the main hard landscaped part of the viewing platform. This is welcome as a different type of an area to enjoy the view and sit peacefully and does reflect the hybrid outline design, but it lacks the ambition of the original design concept developed with stakeholders. The grass amphitheatre with views out over the reservoir was originally conceived as a more multi functional area which would be suitable for education visits and other functions, that could be used by the local community, youth groups and schools in imaginative ways during daylight hours. The small scale of the existing feature prohibits this kind of more ambitious use.
    - Could the extensive planting area south of the existing amphitheatre be developed in a more imaginative way to provide this multi-functional grassed amphitheatre area originally envisaged as part of the view point. This could work with the existing smaller lower area to create a pleasing tiered drop to the water's edge.

- Could local schools be invited to get involved in developing the design for this area so that there is a sense that the local community own and value the area, which may help to discourage anti-social behaviour?
- This would add more interest for the local community to the viewing area, providing an area for family picnics, couples to meet, guide/ scout groups and church groups to gather.
- I think a tiered grass sloped amphitheatre style seating area is more likely to stand up to any anti-social behaviour, rather than the fairly formal planting areas shown. The soil needed to form the banks can be derived from the site excavations to make it a very sustainable part of the project.

b) Intelligent design and incorporation of art in a way that minimise the risk of anti-social behaviour and vandalism in this area is important as the design is developed. Use of locally derived materials is supported.

c) It is not clear what the spillway to the NW of the viewing area comprises?, how much of the structure would be visible at top water level?, and what would become visible as the water level drops? For example, will the spillway be visible seasonally as water levels naturally drop in summer, or will it only be visible during a drought draw down event?

d) The plan shows post and rail fencing along the north side of the crest road. Elsewhere the cross-section refer to provision of a stock mesh fence to discourage dogs and children from accessing the water. The provision of a stock mesh fence would be preferable for that reason, but in needs to be a high quality fence befitting its location and the key part it provides in local views, not just a standard wooden post and wire fence. The fencing could incorporate bespoke art features to add to the interest.

The LPA should seek a more ambitious plan for the western viewing area, with involvement of the local community (particularly schools) in the development of the design going forward.

G8. Drg. 0013 – Proposed Culvert & Valve Tower Layout

Please refer to previous concerns and objections set out in item A1 above to the valve tower being relocated to an offshore position.

It is clear from Drawing 0013 that there is only a small gap between the crane platform extending north from the crest road (but not labelled), to the valve tower. Concerns about public safety and visibility could be addressed by infilling the gap to create a promontory that would ensure that the valve tower is not located in an offshore position.

It is disappointing that the top water and lower water levels are not shown on this drawing to make it clear that the new position of the valve tower is offshore, and that the tower will be stranded above top water level when the reservoir is drawn down as part of the normal operation during a drought.

The spillway structure in the west, and crane platform by the tower, are not labelled on the drawing.

The LPA should **reject the position of the valve tower offshore due to the safety concerns and visual impacts**. Drg. 0013 shows just how close the tower is to the crest road and it will be a magnet for children and adults to swim out to.

G9. Drg. 0015 & Drg 0018 Culvert sections

The culvert sections were submitted with Application 11, but there is also references to them in App 12. The Planning Statement for application 11 confirmed that the developer is seeking approval for drawings 0013, 0015 and 0020. The status of drawing 0018 is unclear. I assume that it is provided to show indicative details of the construction of the tower.

- There is no detail for the upper intake of the tower which will be visible during drawdown events. Details should be provided of how the intake will look, especially from the crest path.
- It is disappointing that top water level and lower water levels are not shown on key sections making it difficult for the reader to understand that the tower has been moved to an offshore location as part of the S73 application to the LPA. This information should be provided on the sections so that it is instantly clear how much of the tower is visible during different operating scenarios including when full, typical seasonal summer drop, for maintenance events (emergency drawdown), and during drawdown events which are part of the normal operation of the reservoir/ tower,
- Further detail on what the steel screens over the intakes will look like and what the bar spacing will be should be provided. The spacing of 150mm proposed for the lower intake would be wide enough for a small child to get there head through and should be reconsidered. Details should also be clarified on how the screens would be cleaned without the need for divers.
- No information is provided in the supporting documents as to whether eddy's, vortex's or other currents are likely to be created at any of the intake positions under any of the different operating scenarios. This should be clarified.
- Further information needs to be provided on the rails, sloping barriers/ spikes, overhangs etc. that will need to be in place to prevent public access to the top of the tower. Indicative sizes or photos of typical safety/ warning signage should also be provided to enable a better understanding of just how ugly the tower will be in this rural landscape.

Note: Further comments/ queries raised on these drawing sections are included in the feedback response submitted on 29/05/24. For example, see comments at C6 & C7 (page 13 to 15).

The LPA should seek further information on the external appearance of the offshore valve tower and the associated intakes to better understand the visual impacts of this significant design change.

G10. Drg. 0021 – Planning Strategy Key Plan

The Planning Strategy Key Plan shows which areas of the applications are submitted in detail for full permission or outline consent consideration.

The NW recreational hub area, is indicated as an area submitted in outline, but the drawing for this area has not been provided with application 11 or 12, so I assume that it does not form part of the applications.

I object to the offshore location shown for the Visitor Centre in the NW. See further comments at G1(viii)

There is no box shown for the Southern Access Road so it must be assumed that the details are submitted for information only at this stage. However, my **objection and concerns about the outline layout of the Southern Access Road are set out in relation to Drawing 0002 above.**

Appendix A

Section 73 – Engineering & Design Report Addendum Information / Concerns

The justification for moving the valve tower to an offshore location is not robust, with very little information provided on the alternative options considered.

1. **Inadequate justification for need to move the tower offshore**
   There is very little justification given for the need to move the valve tower to an offshore location. Section 2.4.2 of the Engineering Report states that it has been moved out of the core of the embankment in order to maintain an uninterrupted homogenous core, which is indicated to be '**preferable**' from an engineering perspective as it improves safety, further reduces risks and enhances the design. From this statement it is clear the design change is only considered 'preferable' it is **not essential**.

   There is no indication that health & safety risks in construction have been balanced against the increase in health & safety risk to the public from siting the valve tower in an offshore position, with the tower likely to act as a magnet for children, youths and drunks to want to swim out to. The **increased risk to public safety is not even mentioned as a risk considered** in the Health & Safety Section (2.14.16) of the Engineering & Design Report.

   The claim that moving the valve tower offshore is to maintain an 'uninterrupted homogenous core' is flawed as the concrete culvert must still pass through the full width of the embankment, including through the core. The process for compacting the clay around the concrete culvert would be no different to compacting the clay around the smaller valve tower, so the risks must be similar and still remain. In fact, with the concrete culvert having direct contact with the reservoir water column and creating a horizontal pathway right through the embankment the risks must be greater for the culvert, but they are clearly confident that they can engineer that safely through the core, so why not the valve tower?

   Paragraph 2.4.10 indicated that; "The options for square towers were rejected due to the challenge associated with compaction around sharp corners and load distribution on flat surfaces." The original valve tower within the embankment submitted for the outline design with the hybrid application had a square profile, however, there is no reason that it could not have been redesigned as a round tower, as all of the tower structure would be below ground so it would not matter what shape or size it was.

   There is no real detail on any engineering risks the designers were concerned about, or what specific outcomes from the ground investigation and test embankment construction may have highlighted issues.

   Portsmouth Water have confirmed on a number of occasions, that the original design of the valve tower enclosed within the embankment was safe. The Eng Report confirms that the movement of the tower to an offshore location is a 'preference'.

   The LPA should **reject the proposal for an offshore valve tower on the grounds of visibility and landscape impact** (urbanisation in a sensitive ancient woodland historic landscape), **as well as public safety** in this area where large numbers of families live very close-by, along with an infants and other schools.

   Instead, the LPA should press the developer to return to the original approved location for the valve tower within the onshore part of the embankment, or to instead create a localised land promontory to ensure the tower is not in an offshore position.

2. **In adequate alternative options appraisal for the valve tower**
The report refers to an options study with detail provided in just half a page of text from Section 2.4.6 to 2.4.11 (page 12). This provides a completely inadequate explanation of the alternatives considered for such a major and significant design change which increases the risk to public safety, transforms the visibility of the structure from invisible to very visible, and urbanises the site to make it very obvious that the water body is a reservoir and not a natural lake.

Considering the advantages and disadvantages of alternative locations for siting the valve tower does not seem to have been a key aspect of the options study. Rather than assessing the impacts of the siting of the valve tower in different locations to consider factors such as public safety, visibility when at top water level and during drawdown, along with the engineering issues, the options study focused on different shapes of tower, with and without haunches.

Stakeholders made various suggestions for alternative siting of the valve tower that would reduce visibility and public safety concerns in February 2024, but none of those alternatives appear to have been considered. Not even the option of leaving the valve tower in the new location to the north of the embankment core and filling in the gap between the embankment slope and the tower to create a small promontory. A solution that removes the concerns regarding safety and visibility, maintaining a more natural looking lake and providing an additional viewing area / rest point on the walk round the reservoir.

3. **Not following design principles in evaluation and decision making processes**
Design principles are set out on page 2 (1.2.2) have not been followed in the siting of the valve tower in an offshore location including.
    - Create a safe environment to work **and play**.
    - Maintain & **integrate with the rural landscape** character and woodland setting, through **the design layout and material selection** process, and where possible developing soft engineering solutions- **limiting structures & ancillary clutter.**
    - Design to be **sympathetic to and blend in** with the historic park and gardens landscape. Specifically considering impact on setting and views to and from the designated sites including the Grade II listed park & gardens, conservation area and South Downs National Park.
    - Ensuring durability in a **challenging public setting**.

Nor is the offshore design delivering on the following project drivers (Section 1.2.1);

- Responsibility – Realise & **build upon health, safety and well being goals**.
- Connectivity – Positive connection for all stakeholders – Customers, the local community & environmental groups. Both Portsmouth Water and the developer are aware that the **community and representatives on the stakeholder groups are opposed to the design change to move the valve tower offshore**.

The design change to move the valve tower offshore is also contrary to the key planning policy requirement set out on page 4 which include.

- Integrate the reservoir and new landscape with the historic landscape and existing woodland.
- Page 4 also confirms that the 'public realm' should have been considered.

There is no mention of minimising the risk to the public through intelligent design, to design out the risks, and that clearly has <u>not</u> been done, as there are other alternatives with less risk available.

It is safer in the short and long-term to design out engineering risks and control them through high levels of supervision, testing and audit during construction, than it is to increase the risk of members of the public drowning and accidents. Since it is not possible to completely design out the risks the

offshore tower poses to children, youths & drunks, as the developer has no control over them, and any signs will be ignored, and barriers seen as a challenge.

4. Preliminary engineering design

Section 1.1.3 confirms that this report provides updated details of the preliminary design. This raises a number of concerns;

a) Why is it still only a preliminary design? This means that the design could be subject to further changes that could make the visibility even worse. For example, moving the location of the tower, or increasing its size or height?

b) This means that other features can be added at a later date which effect visibility and urbanisation of the feature that will not be taken into consideration as part of the planning determination for Reserved Matters & S73.

- Bars and barriers to try and reduce public access to the top of the tower.
- Adding steps from the water for emergency access
- Adding overhangs which would increase the width of the tower
- Signage to warn of the dangers/ hazards

c) An additional secondary means of access, such as a bridge to the embankment, could be added at a later date, significantly changing the appearance and impact of the tower. The tower and any secondary means of access are intrinsically linked and must be considered as part of one planning application. (*See more detailed concerns expressed in Section E of main response*)

If the LPA are minded to grant consent for an offshore tower the developer should be required to provide additional information to show more detail and confirm the following before any decision is made.

- To confirm there will be no other secondary means of access to that currently shown, such as a bridge, and if there is the decision must be made & and details provided, so that an informed decision can be made by the LPA on the full impact of moving the valve tower to an offshore location.
- There will be no steps up the side of the valve tower that could allow a person or child to swim out and climb the tower, or jump/ dive off from it.
- The outer surface needs to be of a material and texture that does not allow it to be climbed.
- There needs to be an overhang at the top of the valve tower to make it impossible to gain access to the top of the tower from below.
- Further details of other deterrent aspects of the tower structure should be provided (e.g. angled barrier, spikes etc. to enable their effectiveness and landscape/ visual impact to be assessed.
- Details of likely signage needed so that its visual impact can also be assessed as part of the LPA evaluation and decision making process.
- If it is determined that a secondary emergency means of escape is required from the tower this should not be in the form of a bridge, nor permanent steps down the side of the tower, instead a foldable ladder should be stored inside the top of the tower so that it can be removed and only attached/ lowered for escape to a boat in an emergency.

5. Slope protection material – lack of options appraisal

Information on page 10 indicated that 3 material options were considered for the wave protection zone. Whereas the Enkamat to be used on the more visible upper inner slope of the embankment just appears to have been selected without an options appraisal? (no indication as to why?)

Appendix B

Landscape & Visibility Assessment – Not robust

ES Addendum 2024, Chapter 10 Landscape & Visual Impact submitted as a supporting document to Application 12. Concerns & feedback provided below.

The Landscape & Visibility Assessment set out in Chapter 10 of the ES Addendum 2024 for the significant changes to the reservoir design proposed under the S73 application is not robust.

A. The significant visual impact of moving the valve tower to an offshore location has not been robustly assessed and the new location should not be approved.
B. The additional height and visual impact of ancillary infrastructure on the valve tower is not considered, above top water level, nor above the embankment crest level.
C. The detail of what structures will be visible on the valve tower during different operating scenarios is not clear and has not been assessed.
D. The impact on historic / landscape views from the Staunton Registered Park & Gardens, or conservation area is not fully assessed, including in relation to moving the Control House further north.
E. The significant negative impact on views from the within the reservoir landscape granted consent in 2021 have not been adequately assessed, including from key new viewpoints already approved.
F. The impacts on the landscape & visibility during drawdown are not considered, especially in relation to views from within the reservoir site and the reduced inner embankment slope angles which will have a detrimental impact on what is visible.
G. The impact on views from adjacent residential properties at Manor Lodge Road (east) and Well Meadow (SW) are not adequately considered.
H. There is no recognition that under the original approved scheme the reservoir would have looked more like a natural lake with no infrastructure visible, under the revised S73 scheme the offshore valve tower makes it obvious this is a reservoir, resulting in a detrimental impact on the landscape character of the area.

A more honest assessment of the impacts on views from the historic landscape and the previously approved landscape is needed. A robust assessment would demonstrate that there **are significant adverse effects**, especially in relation to;

- Moving the valve tower from the currently approved onshore location where it was invisible to an offshore location where **it will be highly visible** in the new landscape, urbanising and detracting from the sensitive rural views. **I object to the movement of the valve tower to an offshore location**.
- Moving the Control House & associated walled compound further north away from Round Wood will have adverse impacts on views from the historic Conservation Area, and detract from views from paths in the Historic Park & Gardens west of the remaining Avenue stub, as well as from Memory Park (Gammon Hill) in the SW. As will the significant reduction in the embankment slope from 1 in 5 to 1 in 9, which will increase how much of the structure will protrude above the embankment. I **object to the movement of the Control House unless additional mitigation action is taken** to;
    - Commit to further tree planting around Round Wood to help provide additional screening. This would have the other positive benefit of restoring ancient woodland, restoring a more round shape to Round Wood & creating more of a graded edge to the wood which has biodiversity benefits.
    - Commit to locally adapting the embankment landform in the vicinity of the Control House and high walls of the auxillary compound to ensure the structures remain as buried as is practical to aid camoflague/ screening, so that views are not urbanised.

A. Objection to significant impact of moving the valve tower offshore

Moving the valve tower from the currently approved onshore location where it was to be invisible in the new landscape, and certainly not visible from historic, or key new vantage points, to an offshore location where **it will be highly visible** in the new landscape is a **significant and retrograde step**.

Having the Valve Tower intentionally hidden in the original embankment design ensured that the reservoir looked as natural as possible in this sensitive ancient woodland and historic park landscape. With all the reservoir structures and buildings hidden within the embankment it was not obvious that this would be a reservoir at all. From most view points it would have looked like a natural lake.

Moving the Valve Tower offshore urbanises the landscape, making it obvious that this is a reservoir and not a natural lake. The change is not required due to the relocation of the embankment. The change is only 'desirable' from an engineering perspective, and Portsmouth Water have confirmed that the original location/ design of the tower was safe. No alternatives assessment has been provided for the location of the valve tower has been completed, less visible alternatives proposed by stakeholders are not discussed.

The LPA should reject the proposal to move the valve tower offshore.

B. Height of the valve tower above the water line not adequately assessed

Section 10.8.9 of Chapter 10 acknowledges that the upper part of the valve tower would be visible in pedestrian views from around the embankment crest path, including from the important new lookout viewpoint located on the south side of the reservoir where the new staircase emerges from The Avenue. The assessment underplays the visual impact by suggesting that the valve tower will only rise 1.5m above top water level (with an additional 1-2m exposed seasonally) and 0.6m above the level of the embankment crest height. However, sections submitted on drawings 0015 & 0020 show that on top of the tower there will be safety railings, which can be expected to be 1.2m high. There will also need to be associated large safety signage, and ancillary structures such as, ventilation pipes, and addition of bars/ barriers to prevent public access, which will all add to the height of the structure and its ugliness, urbanising the views across the reservoir.

The visual impact assessment for the change to move the tower offshore has not taken into account;

- The **additional height of the tower if ancillary structures are included on top** of the tower make it more visible, with a minimum height above top water level of 2.7m (1.5 + 1.2m) and height above stated seasonal changes in water level of up to 3.7m.(i.e. + up to 2m)
- The **additional height above the embankment crest** would be 1.8m (0.6 + 1.2m)
- With the reality **that during drawdown operations the exposure of the tower above the water level can increase to more than 12m for prolonged periods** (see X below).

Note; The Design & Access Statement for application 12 states that at normal operating levels the structure will protrude 2.1m above the water level, not 1.5 as stated elsewhere.

C. There has been inadequate information/ assessment of the impact of structures present on the outside of the valve tower

The external width of the valve tower is not stated in the text. The visual impact assessment assumes that the top water level of the reservoir will be above the Upper & Lower Intakes of the valve tower. However, the reality is that during most drawdown scenarios the Upper Intake will be exposed and visible. Plus, during a full drought drawdown operation the Lower Intake will be visible.

- The S73 Planning Statement (2.2.20) confirms; "The Upper draw off/ intake structure would consist of a concrete headwall with rock lined channel extending from the valve tower to the face of the inner embankment slope. The structure would not be visible under normal operating conditions." However, it will be visible during operational(drought) drawdown events and the visual impact assessment should consider such operational scenarios. There is no detail showing what this Upper Intake structure will look like, particularly when viewed from the nearby embankment crest path.
- Section 2.2.7 of the S73 Planning Statement indicated that; "As the reservoir culvert would be located within the embankment structure, it would not be visible under normal operating conditions of the reservoir. However, in the event that the reservoir is fully drawn down parts of the concrete inlet structure would be visible at the upstream toe (inside) the embankment". It states the fully drawn down scenario would only happen for emergency or maintenance reasons.
- There is no indication as to which of these structures would be visible during operational drawdown scenarios. However, it is likely in a drought the Upper & Lower intake will be exposed and that they could be exposed for long periods. Some outline details have been provided on Drg. 20 sections as to what the Lower Intake and associated steel bar screens might look like.
- The valve tower is to be constructed of concrete with a plain, neutral, coloured finish. There is a lack of detail on the texture, colour etc. above and below top water level.

Given that the reservoir is designed for operational drawdown events it is reasonable for the LPA to expect the applicant to;

- Submit additional information on what the Upper & Lower Intakes will look like when exposed, along with details of the finishes, so that the LPA can consider their impact on local views from the embankment crest path, new western & Avenue viewpoints.
- Consider the visual impact of both the valve tower and its associated structures during operational drawdown events, given that drawdown is an integral design function of the reservoir.

Note: If a secondary access were to be proposed in the form of a bridge, this would have a very significant additional visual impact (*See objection at Section E in my main response*), so it is important that the full impacts of moving the valve tower offshore are understood and assessed now.

D. Visual impact on historic / landscape views from the designated Historic Conservation Area and Registered Park & Gardens

There are a number of potential impacts on views from the Registered Park & Gardens and designated Conservation Area which have <u>not</u> been fully considered in the visual impact to date

D1 Increased visibility from the remaining historic landscape; The Control house building and the high walls of the ancillary courtyard will move further north under the S73 changes, further away from the screening benefit provided by the remnant of Round Wood which is an area of ancient woodland within the Historic Conservation Area. The new location for the Control House and courtyard will be <u>more</u> visible from the adjacent grassland and ancient woodland edges between The Avenue and Riders Lane Stream which form part of the remaining Historic Conservation Area. The Control House & courtyard will also be visible from the footpath to the west of The Avenue ancient woodland stub, which is part of the Registered Park & Gardens.

- **This is not considered as part of the impact assessment (visual, landscape, or historic), but the adverse impacts <u>must</u> be considered and mitigated.**
- Mitigation could be in the form of additional tree planting around Round Wood in part of the additional space created by moving the embankment north. This would provide other benefits in making the Round Wood more round again, replacing lost ancient woodland, and creating a more graded woodland edge would provide biodiversity benefits. Very much a win-win mitigation measure which I hope the LPA would support. And require.

D2 Negative impact on visibility/ screening of reducing the embankment slope gradient around the Control House; The S73 application proposes to reduce the embankment slope angle in the vicinity of the Control House area to 1 in 9 (Drg. 4003) from 1 in 5. This gentler slope and larger proposed building footprint (increased from 430m^2 to 567m^2) mean that more of the Control House Building and high walls associated with the ancillary courtyard will be exposed and visible, as less of the structure will be covered by a 1 in 9 slope.

The changes to the embankment slope and Control Building size are **not considered in the visibility, landscape or historic impact assessment,** but in my view **given the close proximity to the Historic Conservation Area and Registered Park & Gardens the revision to the S73 design are locally significant and do require mitigation.** The Control House area will also be more visible from Memory Park (Gammon Hill) in the SW.

The LPA should require mitigation of the additional adverse effects of the slope reduction, movement north & change in area footprint of the Control House building by locally increasing the angle of the slopes around the Control House to ensure that as much of the structure is buried or more screened, as was intended in the original design granted consent.

Note: See also C1 in main comments.

D3. Adverse impact on views from the historic landscape

a) Visibility from the SCP Terrace of the former Mansion House; Table 10.3 (page 70 & 71) confirms that the changes to the embankment slopes and the far shoreline of the reservoir will be visible from The Terrace viewpoint. The text suggests that there will be no views of the valve tower, from the Terrace as it would be screened by the embankment, but this is not the case as the valve tower sticks up at least 1.8m above the embankment crest when the safety rails are taken into consideration.

- The LPA should require more evidence to support the claim that the offshore valve tower will not be visible over the tree line from the SCP Terrace, this can be done by producing a cross section (see A1c on page 4 refers), given that the far shoreline is visible and the valve tower is known to protrude above the embankment crest.

The visibility of the valve tower does need to be considered as the longer views from The Terrace are mainly of woodland/ trees, as a result your eye is drawn to the gap in the trees that used to be grazing meadow, but is now where the SW area of the reservoir construction site is clearly visible. As a result there will now be;

- Construction impact; The S73 changes will result in a larger embankment footprint in the SW, longer culvert & offshore valve tower construction. With the impact confirmed as lasting an additional 2 years for visitors to the heritage assets and residents, which **the assessment acknowledges is an adverse impact.**

b) Visibility from the main path leading to the Terrace from Middle Park Way; The staff and volunteers at SCP have removed scrub along the western boundary of the gardens to open up historic views to the west and south west. This change in visibility is not recorded in the visibility assessment. This makes the SW corner of the reservoir site visible over a wider area from this high path within the Registered Park & Gardens. The visibility impact assessment must consider;

- *Construction impact*; Should consider the fact that the embankment will have a broader footprint in the SW, extend further south and take 2 years longer to construct, making the impact from the path and the Terrace more significant during construction.

- *Operational Impact;* Should consider if the valve tower or Control House structures will be visible from the path, I believe the valve tower is likely to be visible from the SCP Terrace and the path leading down to it from Middle Park Way.

c) Not considering impacts from SCP west parkland gate; For example, views to the larger, closer SW embankment are not considered from the parkland gate adjacent to the Riders Lane Stream.

d) Mitigation actions need to be proposed and implemented; No mitigation is proposed for construction impacts on historic views, the 2 year longer time period for the impact, nor impacts on historic views during operation. The assessment confirmed the adverse impact on the SCP historic designated sites **will last an additional 2 years**, impacting visitors, staff & volunteers to the heritage assets, as well as local residents (especially those with windows overlooking the site in the SW), yet no additional mitigation is proposed.

- It would be reasonable for the LPA to **seek additional mitigation for the acknowledged adverse impact** on the historic designated sites, especially longer time frame, and other impacts noted above. This could include;

- Additional tree planting around Round Wood to make it more round again.
- Early woodland mitigation action to enhance Round Wood to diversify the age structure and improve the appearance of the fragment of ancient woodland before the site re-opens to the public, including work to speed up the development of an understorey and field layer. With deer fencing provided as soon as possible.
- Improving the access between the SCP gardens and parkland through to Warren Park, so that visitors can still enjoy a long circular walk around the reservoir site, and the local residents can have a better enhanced access to the Registered Park & Gardens, now that their access to the Park via The Avenue has been permanently removed.

e) The embankment extension & valve tower will be visible from existing views in the E & NE; The impact assessment acknowledges that the embankment moves further north and the valve tower will be visible from the NE (V7) & E (V6) of the site, including the long distance path. It is suggested that the valve tower will be a small element within the wider landscape seen against a backdrop of the grassed embankment. I would disagree, the tower height will protrude above the embankment, with this urban structure, in an otherwise rural landscape catching the eye, which will be drawn to it. The visibility and thus the impact will be even more during drawdown, when the tower will stand out like a sore thumb in views from around the reservoir site, but drawdown visibility impacts are not assessed.

Note: The valve tower is also likely to be visible from part of the western boundary path, where the western embankment is very low and merges with existing ground levels allowing the tower to be visible through the gaps in the embankment, as currently no tree screening is proposed.

The change to the views from the NE and along the eastern boundary path will also be significantly impacted by the extension of the eastern embankment 50 to 60m to the north. The embankment under the original design would have blended into existing ground levels much further south, giving an altogether more natural appearance to the reservoir edge in this eastern area. A direct adverse impact over a distance of up to 60m of the site boundary should be considered significant, especially as the change is visible over the full length of the eastern boundary.

E. Significant negative impact on views from within the reservoir landscape granted consent in 2021 which have not been adequately assessed

The **significant negative impact on views** from within the reservoir site, **which impact the landscape granted consent in 2021** have not been adequately assessed, including from key new viewpoints already approved.

In 2021 the LPA granted planning consent for a reservoir design that was considered to meet the design criteria developed with stakeholders, address the adverse impacts on the historic landscape and designated features, providing a natural looking water body that blended in with the sensitive ancient woodland and historic park setting.

The developer has not followed the previously agreed design principles in amending the design relating to public safety, intelligent design, and to ensure any changes blend in with the sensitive ancient woodland and historic park landscape.

That approved landscape is now being altered by the S73 proposed changes and it is important that the impacts on the approved reservoir landscape are properly considered. This is not currently the case. The impact assessment suggests that the valve tower will be a small element in the wider landscape but it will have a large and disproportionate impact on views from around the reservoir crest path as well as being;

- Highly visible from the important new Western (Memory Park) viewpoint which is very close to the proposed position of the offshore tower.
- Visible from the historically significant new Avenue Staircase view point, designed to look both south over the SCP woodland and north over the reservoir site (confirmed in Section 10.8.9).
- Visible from the visitor centre in the NW of the site and from the western crest path which will be a busy route south from the visitor centre.
- Visible from northern viewpoints along the wetland.

The impact assessment acknowledges at close range the valve tower would appear as a prominent features, but no mitigation is proposed and none is possible. I disagree with the assessment that in 'most views' it would appear as a minor element. It will be a very urban element in a rural view and therefore visitors eyes will be drawn to it from all around the reservoir site. It makes it obvious that this is a reservoir and not a natural water body, changing the landscape character.

The detrimental impacts on views in the new landscape as a result of the S73 changes have not been properly assessed and as a result some of the conclusions of the visual impact assessment are flawed or inappropriate.

The LPA should require a more robust visibility impact assessment, taking into account the changes to important views in the new landscape. This should include images showing the difference in how the view from key reservoir viewpoints (Western Viewpoint, Avenue Staircase Viewpoint, Visitor Centre location, northern shore central viewpoint, crest path in the west, east & adjacent to the valve tower) will look as a result of the S73 changes, compared to the views that would have been provided under the existing planning consent for the reservoir.

F. No assessment of additional impacts during drawdown; The impacts on the landscape & visibility during drawdown are not considered in the assessment, not even in relation to views from within the reservoir site as a result of the S73 change to reduce the inner embankment slope angles. Reducing the embankment slope angles will have a detrimental impact on what is visible during drawdown events. The shallower the angle of the slope, the more of the slope and armouring that will be visible, with more mud exposed. Detail of the amendments that have taken place to the borrow pits design is not provided with the application, but the layout is being changed to achieve the cut and fill balance necessary for the new embankment design. The Borrow Pit design could also have a significant impact on the amount of mud that is visible during drawdown and what open areas of water will remain visible below the lower drawdown level. Walking round a reservoir which is drawn down is a very different experience to one that is full, so it is reasonable to expect the change to the visible impacts of drawdown to be assessed.

What the valve tower looks like during drawdown will also be important to understand as it will stick out like a sore thumb during drought or emergency/ maintenance drawdown events, by more than 12m. See queries/ concerns raised in items B & C above (page 41 & 42).

Reservoir drawdown is an integral part of the reservoir design and operational function post construction, the S73 changes will have detrimental impacts on what is visible during drawdown. The LPA should seek further information to fully understand the impacts of the changes before consent is granted.

G. Negative impact on views from adjacent residential properties; The impact on views from adjacent residential properties at Manor Lodge Road (east side) and Well Meadow (SW side) are not adequately considered in the assessment. From the upstairs windows of these properties which view directly out over the reservoir site the S73 changes to the embankment will be visible. Residents will also be able to see the top of the valve tower rising to 1.8m above the embankment crest. The assessment indicated that the view will be screened by the intervening vegetation (i.e. the advanced planting) I disagree as for the first 10 years of the project views over the reservoir site will not be obscured by the planting as it will not be high enough.

- The Phase 2 planting in front of the Well Meadow properties was not watered and largely failed, requiring replacement. The replacement planting was only completed in winter 2023/24 and will take a substantial time to establish to any significant height. The embankment in the SW will have a larger footprint and will be located slightly closer to the south, with the construction period lasting an extra 2 years longer, the residents views will be adversely impacted during construction and the early years of operation. No mitigation is proposed.

- While the Phase 1 planting is some distance in front of the Manor Lodge Road properties the planting was better cared for after being planting and is more established, its exposed location means that it has been slow to gain height. The embankment in the east will now be wider and extend further north, such that construction activities are now proposed in this area over a longer time frame, with the programme extended over an additional 2 years. As a result there will be visual impacts to the dwellings for the whole of the extended construction period. No mitigation is proposed.

Appendix C

Biodiversity Assessment of Impacts – Not robust

ES Addendum 2024, Chapter 8 Biodiversity submitted as a supporting document to Application 12. Concerns & feedback provided below.

Concerns;

- No recognition that **water quality degradation** through mobilisation of silt has already occurred and additional stream length has been lost to accommodate the construction of a strategic sediment pond/ lagoon in the SW (Section 8.7.3). Measures put in place during 2023 and early 2024 have failed to control silt mobilisation. There is no proposal for mitigation of damage that has already occurred, including silt build up in the downstream channel of the Riders Lane Stream.
- Recognition that 0.04ha of **priority purple moor-grass habitat along both sides of the stream channel in the SW has been lost** to accommodate the construction of a strategic sediment pond/ lagoon. However, it is indicated that the loss is temporary and the area of purple moor-grass & rush pasture habitat will be reinstated during later stages of the construction (Section 8.7.5). However, **the reality is that part of the area of priority habitat and the area that was to be enhanced to create new priority habitat has been permanently lost, as the area of the SW embankment will move further south along the stream edge.**
    - **This permanent loss of an area of priority habitat is not recognised.**
    - **Nor is any mitigation proposed in response to the permanent loss.**
- The text at Section 8.7.6 seems to initially recognise that a length of stream channel is lost below the extended footprint of the SW embankment. However, it then goes on to suggest that as the embankment is moving north more of the stream is retained. This is an error. The footprint of the SW embankment is being moved south and **a section of channel that was to be retained is now permanently to be lost** if the S73 application were to be approved**.**
    - **No mitigation is proposed for the permanent loss of the stream.**
- Section 8.7.7 recognises that the **2 year extension to the construction phase** has the potential to;
    - **Delay the establishment of the proposed habitat creation that would benefit protected species.**
    - **Increase the period in which commuting, foraging, nesting and roosting animals may be affected indirectly through disturbance from temporary lighting, noise & vibration during construction.**

  The text goes on to claim that the mitigation measures in place to minimise disturbance will continue to apply. However, the reality is that **the mitigation measures have not always been implemented** for the work completed to date and the **mitigation work in adjacent woodland (especially Havant Thicket) is behind schedule.**

    - To **mitigate the impacts of delays to habitat creation the developer should propose an accelerated programme for tree/ scrub planting**, especially where it is to provide screening benefits for wildlife or recreation, to give the trees the opportunity to become established before the site is opened to the public.
    - Portsmouth Water should **give a written commitment to ensure that delay to the mitigation measures for adjacent woodland is caught up in winter 2024/25**.
    - **Ecological supervision at the site needs to be improved** (see my email 13/5/24 -page 3, item B3)
- **No simple summary of habitat lost;** It is not clear from Table 8.2 (Summary of changes to habitat creation within the reservoir site that some habitats will be lost;
    - **Permanent loss of a length of stream in the SW.**

- **Permanent loss of wet grassland/ priority habitat in the SW**
- The area of grassland habitat on the embankment outer slope may increase a bit, but not by the increased area of the gentler embankment slopes, as **areas of grassland below the wider embankment footprint will be permanently lost.**

The statement in Section 8.10 that the assessment of effects has not changed since publication of the 2020 ES is incorrect, **as the S73 proposed changes do have an adverse effect on biodiversity. Contrary to the text at Section 8.13 further mitigation should be proposed.**

- **Ecological Mitigation & Enhancement Report has not yet been submitted** for the discharge of Condition 36 for Phase 3.
- **Not clear if any more tree or scrub clearance will be necessary** to accommodate the direct or indirect impacts of the S73 changes to the reservoir scheme. Item A2 in my main response highlights potential impacts;
    - Direct impacts where the crest and toe roads join the eastern boundary path.
    - Indirect impacts from changes to the eastern embankment footprint changing the position or layout of other infrastructure (new water course channel connection, or location of multi-user path)

The LPA need to ensure that additional mitigation measures are proposed to address the permanent effects of the S73 changes to the reservoir scheme. This should include clarifying **where the additional mitigation area will be for creation of priority purple moor-grass habitat in a suitably wet area.**

Appendix D

ES Addendum 2024 – other unsound assumptions, statements & information

A. Consultation (Section 5)

Page 24 of the ES Addendum 2024 refers to consultation with local stakeholders and community representatives by way of a workshop in February 2024.

Section 5.1.2 states; *The workshop invited consultees to provide their opinion and feedback (both in writing and via online meetings and in-person workshops) on the proposed changes to the Scheme. The 'You Said, We Did' Report (Document Reference: HTR-FUW-P3-ZZ-RP-T-0553) details responses received during the consultation exercise and how feedback was considered and/or incorporated into the Scheme, where it has been appropriate to do so.*

This was not really a workshop, rather a number of short presentations from the Contractor setting out the proposed changes to the community, with no opportunity to ask questions until the end of the morning, when the time for questions and discussion was severely limited. Those that attended commented at the end of the morning that they felt it was not a workshop, as there was no opportunity to influence the design, nor adequate opportunity to ask questions or discuss concerns as the presentations were made.

The information in the 'You said we did report' submitted in support of the application does not adequately reflect the feedback provided, or the level of concern expressed about the proposal to move the valve tower offshore, nor of the alternatives options suggested by stakeholders. The first page of the report says that it was a consultation, but it did not feel like that as the decisions had already clearly been made.

Note: The same 'You said we did report' submitted for both planning application 11 and 12.

B. Noise & Vibration Assessment (Section 11)

Works moving closer to residential properties for longer; Para 11.8.1 states; *The footprint of the reservoir has receded on the southern aspect, effectively moving some elements of the embankment and associated construction activity further away from sensitive receptors.* This is not correct and as a result **the assessment presented is flawed**. While the crest of the southern embankment is moving further north, in the SW the change in the slopes means that the embankment footprint is actually now much larger. Page 12 of the Planning Statement for App 12 confirms that the realignment **extends the embankment 45m south at the western end, moving the embankment closer to the residential dwellings.** This is not considered in the assessment and nor is the extended time period of the works taking place closer to residents.

The assessment also does not discuss or acknowledge any impact of changes in the embankment slopes/ footprint in the east close to residential properties at Manor Lodge Road, which includes an extension of the embankment 50-60m to the north (see Planning Statement page 12). If nothing else, this will significantly extend the time period over which noise impacts will occur in this area close to residents in Rowlands Castle.

Ecological impacts; The assessment does not consider the impacts on ecological receptors, even though a larger embankment will now be constructed that will take 2 years longer to build. In addition the developer has asked to extend the working hours to start earlier in the morning and work later at night. The impact of these changes has not been adequately assessed.

The LPA should be ensuring that the additional impacts from noise & vibration on residents has been appropriately considered, especially taking into account where the embankment moves closer to residents, as this has not yet been done.

The LPA needs to ensure that the developer fully assesses all of the impacts of the proposed changes to the embankment footprint, longer working hours, and 2 years of extra working on ecological receptors. Then ensure that mitigation measures including exclusion zones for working outside of the existing approved hours are introduced.

C. Traffic & Transport (Section 12)

C1. Safe route for operational vehicles to turn in the east not discussed or provided; Section 12. 8 considers the potential impact of changes during the Operational Phase, but unfortunately does not consider the impact of Portsmouth Water operational vehicles being directed into the narrow existing eastern boundary footpath. The Outline Masterplan (Drg.0001) now shows both the embankment crest road and the toe road terminating at the existing narrow eastern boundary path, which is part of the long-distance path from SCP up to the South Downs National Park (SDNP). No safe turning head is shown to allow vehicles to turn safely and not enter the footpath. There was to have been a turning head provided to enable operational vehicles to safely turn at the eastern end of the embankment, without having to use the narrow existing eastern path. There was also to be no operational access/ exit out through the boundary gate to the Whichers Gate/ Manor Lodge Road roundabout, but there is no mention as to whether this is, or is not to be permitted?

When objections were raised at the hybrid planning application stage due to the lack of detail in this eastern area*, including regarding how safe operational vehicle turning would be provided from the embankment roads; councillors, stakeholders & community objectors were assured that more detail would be provided at the detailed Reserved Matters stage to show how this would be done safely.

Note * The scale of original hybrid application Outline Masterplan was not good enough to see the complex detail in the east and the Gipsies Plain larger landscape plan covered the layout too far south to capture the detail.

The plan for the crest & toe embankment roads to both terminate at the narrow eastern boundary path does not provide the safe solution promised. The path is already heavily used by walkers, bikes, mobility scooters, families and is part of the long-distance path network linking into the SDNP. It is enclosed by trees & a hedge, so to make it safe the eastern path would have to be widened and this would result in loss of hedgerow/ trees (including potentially mitigation planting from 2019). Any loss of tree/ scrub in this narrow pinch point in the eastern wildlife corridor would be unacceptable.

The Traffic & Transport Assessment should consider how operational vehicles will use the site safely with all other recreation users, without introducing unnecessary conflicts. The ES Addendum 2024 fails to consider this important issue and the design currently shown is inappropriate.

I object to the embankment crest & toe roads terminating at the narrow eastern boundary path as it does not provide the safe solution promised for operational vehicle traffic to turn and return to the west.

C2. Safe route for operational vehicles to turn in the west not discussed and unclear; The use of the site by Portsmouth Water Operational vehicles is not discussed in the assessment. Vehicles will use the crest & toe roads daily when inspecting the embankment and for other operational and maintenance tasks, ranger vehicles will also patrol using these roads. Consideration needs to be given to how they do this safely, especially where the vehicles exit/ enter the embankment roads.

There is a lack of detail provided at the north end of the western embankment where the crest and toe roads will terminate. Drawing C002 for the Southern Access Road shows them terminating without linking to the Southern Access Road. More detail needs to be provided to show how the

western embankment crest & toe road join safely with the Southern Access Road, or how a safe vehicle turning head is to be provided in this area which is part of the recreational hub for visitors.

C3. Import of additional volumes from off-site sources not adequately considered; Paragraph 12.10.1 states that; *The ES Addendum has identified that there has been no change to the magnitude of impacts anticipated during construction of the Scheme*. Paragraph 12.7.9 acknowledges the increase in sand & aggregates needed as a result in the increase in volumes of material needed to construct the larger embankment, but does not acknowledge the **significant increase in the volume of rock rip rap and Enkamat erosion protection rolls that will be needed for erosion protection** due to the proposed shallower slopes on all of the inner embankment slopes. These materials will not be sourced from site. The bulky rock in particular could have an impact on the number of vehicle movements and the impacts of this should have been specifically discussed in Sections 12 & 13.

D. Material Resources (Section 13)

D1. Changes to material quantities not clearly discussed; The volume of imported materials has changed as a result of the S73 significant embankment footprint & slope changes. Section 13.8.2 acknowledges this indicating; *The data on specific materials presented in **Table 13-3** provides **revised** quantities and planned year of transfer. A wider range of materials is now included, splitting out aggregates into the different components. The quantities for aggregate/sand have increased, as previously the combined aggregate/rock category had a total quantity of 279,800 tonnes, whereas the revised estimate is now 454,549 tonnes **just for sand**. These materials will be imported to the site.*

There is **no specific recognition or discussion on the fact that the volume of rock rip rap and rolls of Enkamat will also have needed to increase significantly to provide erosion protection across the longer gentler embankment slopes in all areas**. This will impact the volume of these materials to be imported as neither are site won. While it might be the case that the overall number of lorry movements required to import all of the materials needed 'may' not have changed, if very conservative estimates were originally used in the ES, the materials whose volumes will increase as a result of the S73 changes should be clearly stated in Section 13, so it is clear that this has been considered.

Paragraph 13.9.1 states; *The potential impacts from materials and waste have not been re-assessed, as the direct and indirect impacts that were identified in the 2020 ES remain valid. It is recognised that the quantities of materials have increased, however the implications of these changes are considered in other topics*. However, the other topic assessments rely on the information in this section! (see App. D, C3 above).

The LPA should request clarification as to the changes in the material volumes needed for rock rip-rap and Enkamat erosion protection, and seek confirmation that there will be no increase in predicted vehicle movements as a result of the increased volumes to be imported.

D2. Sustainability assessment; No cost/ benefit or sustainability assessment has been provided on the choice of rock rip, nor Enkamat A20 as the preferred solution for embankment armouring.

D3. Inlet pipeline changes; There is no information on the increase in materials and concrete needed to construct the new inlet pipe that is being routed around the SW side of the embankment and across the reservoir floor. Nor the additional energy costs of its operation. I assume that the pipeline extension does not form a part of the S73 changes for which permission is sort and instead the details for this change will be submitted as a part of the revised pipeline application.

E. Water (Section 14)

The **assessment does not consider all of the changes (direct & indirect) that may occur** as a result of this S73 application including;

a) The impact of the loss of the stream section below the SW embankment is not acknowledged in Table 14.5. The text in the table states; *However, the area of channel and floodplain that will be*

covered by the extended embankment would have been lost below the reservoir as assessed in the 2020 ES. This is not the case. Where the embankment extends further south an additional length of the stream channel will be lost. The conclusion in paragraph 14.16.1 that; *Extension of the reservoir embankment will not result in any additional loss of hydromorphological elements of Riders Lane Stream*, is incorrect. **There is a loss of stream section and this should be reconsidered, along whether there is a need for additional mitigation for loss of stream and associated priority grassland habitats?**

b) The increase in the embankment footprint could cover more of the spring line present in the SW, there is no indication that this has been considered as part of the assessment.

c) The increase in the embankment footprint will require a larger area of cut-off wall/ barrier between the embankment and the Bognor sand formation at Gammon Hill. There is no indication that this has been considered as part of the assessment. Could the S73 changes have any impact on water levels in the sandstone aquifer, or could it change flows? Could this have any adverse indirect impacts elsewhere, including away from the site?

The LPA should require further work to properly consider and assess any impacts to the water environment from the larger embankment footprint in the SW that results from the S73 changes.

F. Effect on Climate (Section 15)

It is not clear how the increase in the volume of imported materials needed as a result of the S73 changes have been taken into account. The change in the size of the embankment footprint and reduction in the inner slope angle means that more rock rip-rap and Enkamat rolls will be needed (see D1 above). Placement of these additional materials will also require additional vehicle movements and energy, as well as having potentially other ancillary impacts. For example, more damping down needed, so potentially more water used.

G. Population & Human Health (Section 17)

G1. Construction impacts on health & well being;

Table 17.7 confirms **a change in impact of health effects from Minor to Moderate as restrictions in access to the paths and open space at the reservoir site will drag on for a further 2 years**. This is also confirmed in the text at 17.2.2 and 17.7.3 confirms; *A Moderate magnitude of impact has been identified for access to opportunities for recreation and leisure during construction, as access to open space would be temporarily restricted for an additional two years.*

Table 17-7: Reservoir construction phase - health determinant impacts

Health Determinant	Impact Description	Impact Magnitude (2020 ES)	Impact Magnitude (2024 ES)
Access to opportunities for recreation and leisure	**Temporary restrictions** on access to Havant Thicket during construction were identified in the 2020 ES. With the proposed changes to the Scheme, access to open space would be **temporarily restricted for an additional two years.**	Minor	**Increased to Moderate**

In fact, many paths will never re-open, including the well used route from Warren Park to the recreation facilities at SCP which went via The Avenue woodland peninsula. Not only have paths been closed but the rural tranquil environment for local people to walk providing benefits for mental health have also been disrupted, as all remaining walking routes from Warren Park view out over the construction site. This is a major stress factor for many local residents who grew up walking and enjoying and loving the open countryside (including woodland), which is now lost. The impact on health & well being should not be underestimated as a significant number of people from Warren Park and Rowlands Castle no longer feel able, or want to walk around the site where they have walked for years, as they find it too distressing. This can have a significant adverse impact on both their mental and general health, which will now be extended for a further 2 years.

Section 17.10.3 states; A moderate adverse effect on access to opportunities for recreation and leisure would be experienced by all receptors, as access to open space would be temporarily restricted for an additional two years. **With mitigation, a slight adverse effect would be experienced by users accessing the site for recreation and leisure. However, no additional mitigation is being proposed.**

Table 17.8 confirms that the additional impact would be on, *Children and adolescents, older people, low income groups and the disabled.* 17.6.30 confirms *that Havant is above the national unemployment rate.* Section 17.6.19 *indicated that Warren Park remains below the national average for proportion of population in very good health, and above the national average proportion for population in good health, fair health, bad health and very bad health.The most severely impacted residents will be those at Warren Park, as residents at Rowlands Castle can still walk in to Havant Thicket and SCP via Cedar drive to escape most of the construction impacts.*

More could be done at Memory Park to restore access that has already been lost from the NE end of Swanmore Road. To provide some mitigation, the construction boundary fence could be inset from the existing metal railings fenced boundary when the temporary compound is removed off Swanmore Road, allowing restoration of a circular route with a separate entrance in and out of the west side of the site, utilising the existing stile (still in place), restoring what was available to local residents and dog walkers before construction started.

In addition, Now that it is known that impacts on human health will be extended beyond the original programme completion of 2029 by a further 2 years, the LPA should require that Portsmouth Water provide an enhanced safe path link between Memory Park (Warren Park) in the SW of the site through to the SCP parkland, to allow improved and safe access for families and the less able to more easily access the excellent facilities within SCP (where necessary working with HCC to achieve this), to mitigate the existing and future impacts of the loss of paths (including the loss of the communities previous attractive route to SCP) over the next 6 years. This would then also honour the long standing commitment previously made by Portsmouth Water to maintain a circular route around the reservoir site during the construction phase.

Note: The path should only be closed when essential to allow the new pipeline to be constructed through the SCP parkland area, with the closure kept to as short a period as possible.

The LPA should be seeking additional mitigation from the developer for the adverse impacts being caused by the construction works on access to the countryside and impacts on local health & well being of the local community. Suggestions for the form these mitigation actions could take is provided above.

Both proposals above for improved access would be welcomed by the local community and have previously been suggested to Portsmouth Water by community stakeholders.

Note: Proposal for mitigation also made in Section F5e of the main feedback document (page 22/23)

G2. Operational impacts on health & well being;

Section 17.8.1 Concludes *that; The impacts of the proposed changes to the Scheme during operation would remain the same as those presented in the 2020 ES.*

Yet on the new S73 Outline Masterplan some paths are no longer shown. Notably, the path from the east side of the stream near Warren Park up to the embankment crest path.

The LPA should require that a path from the parkland gate on the east side of the Riders Lane Stream to the embankment crest path is restored on the Outline Masterplan, recognising that it will be a desire line to walk regardless, and it would be better to formalise the presence of the path in this sensitive area where essential biodiversity wet grassland

mitigation is proposed, rather than allow the development of informal desire lines through the wet grassland area in the SW which would have a negative impact on ecology, detracting from the mitigation benefits to be provided.

This will also provide a long-term safe route for people, including families and the elderly, to traverse from the SCP parkland / lake area to Memory Park & Warren Park, via the bridge over the stream to be provided along the operational access road.