

Objection to discharge of Condition 4 re- separation of phase 6 secondary access /lack of sub-phasing detail for wetland

Planning application – re Havant Thicket Reservoir – Phasing Condition – Wetland Phase 2 (& Phase 6 objection)

HBC ref: APP/20/00990

EHDC ref: 51680/007

Re -Planning Condition 4 re Phasing

1.0 Phase 2 – Wetland phasing/ timescales

Only generic phasing information has been provided for the whole reservoir site. There is no indication as to any more subtle detail on the sub-phasing of work within the retained wetland area (Phase 2). The LPA need to seek clarification on the following.

- Is the proposal to do all earthworks for the retained wetland bunds and associated structures in 2024?
- Or will some earthworks such as the ephemeral shallows be completed at a later date closer to when reservoir filling takes place, as would be more appropriate?
- When will the islands be created within the retained wetland?
- When will landscaping work be undertaken?
- Will any tree, scrub or hedge planting be undertaken early to enable screening to establish in critical areas. For example, along the western edge of the retained wetland close to the proposed recreation hub, or along the northern edge in the vicinity of hides?
- Timing for the creation of temporary balancing ponds within the wetland area? (Further investigation is needed to establish whether this opportunity can be used to deliver earlier biodiversity mitigation for losses which have already occurred, which would also help to kick start the natural generation of wetland habitats)

Future Water have previously indicated to stakeholders that not all of the wetland construction works would be completed in one go, some elements may be constructed later. Further details on the wetland sub-phasing need to be submitted to aid the LPA's understanding of what is proposed.

For example, Future Water indicated the ephemeral shallows ground manipulation work could be done much later. There would be a potential benefit to leaving the construction of these features until shortly before the reservoir is full, so that the existing vegetation remains undisturbed for as long as possible, and then is flooded by reservoir filling as soon after construction as possible to optimise the opportunity for the right kind of vegetation to form.

Whereas there are benefits to bringing other elements such as the planting for future wetland screening purposes forward, to enable trees and scrub to become established, plus provide an interim biodiversity mitigation/ benefit. Further comments are made on where additional screening is necessary in my response to Condition 27 (Tree Impact Assessment).

The LPA need to seek further information on the phasing of the works associated with the retained wetland to clarify what is proposed and ensure that work is phased in an appropriate way to optimise the biodiversity benefits and ensure that planting for screening purposes to protect the wetland from disturbance is completed as soon as possible.

2.0 Phase 6 - Proposed phasing shown for the secondary means of access to valve tower is not appropriate

The phasing plan document submitted in relation to discharge of Condition 4 shows;

Phase 6	Secondary means of access to outlet tower	Q1 2025	RM (Following new application)
---------	---	---------	--------------------------------

Note: There is also a page added to the Construction Method Statement for the phase 6 – Secondary means of access

I object to this element of the phasing plan which would allow the secondary means of access to the valve tower to be considered by the LPA at a later date, separate from that for the offshore Valve Tower.

The LPA should reject the phasing plan submitted and request that the application details for the offshore valve tower and any secondary means of access come forward as **one** application phase, in order to allow a full and proper assessment of all of the potential impacts **before** any decision is expected to be made on the offshore valve tower, which represents a significant change to the approved outline design.

I do not believe that is appropriate to separate the application for an offshore valve tower from any secondary means of access to that valve tower. They are intrinsically linked and one cannot happen without the other and these elements should be included in one application to the LPA's. This is because the impacts of the valve tower will be made worse if a bridge is to be provided.

Since F. Water took the decision to change the outline design to include an offshore valve tower there has been plenty of time for them to establish if a secondary means of access to the tower will be needed. I am concerned that if the applications are separated and the LPA's were to give consent for an offshore valve tower, it could then put them in an impossible position of having to approve the means of secondary access if F. Water were to insist in a later application that a bridge is needed for health & safety regulation compliance.

There are significant objections from stakeholders and the public to an offshore valve tower, especially if a bridge from the embankment is to be provided as a secondary means of access. These particularly relate to the health & safety risks of children or adults trying to swim out to the tower, or using the bridge as a structure to dive from, with all the risks that brings. No matter what mitigation measures might be put in place, youths would see them as a challenge and be determined to overcome them, ignoring any warning signage. There is also significant concern about the visual impact of a tower (with or without bridge) detracting from the natural looking lake originally proposed and making it obvious this is a reservoir. The visual impact will be greater if there is a bridge and an offshore tower. The tower and bridge is highly likely to be visible from the Grade II listed historic park and gardens.

In order to assess the health & safety, as well as landscape impacts of this design change it is important that both the offshore tower and any secondary means of access are submitted for approval as one package. The merits and any issues associated with this design change can then be fully considered by the LPA and an appropriate decision taken, based on full, rather than partial/ incomplete picture of what it proposed and what it would look like.

The valve tower does not have to be offshore, the contractor can revert to the original placement of the valve tower within the embankment. The embankment and valve tower construction is not scheduled until 2025 (see below), earthworks for the embankment could commence before the valve tower works over large parts of the site. This means there is time for F. Water to finish gathering whatever information is needed to make the decision on whether a secondary means of access is required to the offshore valve tower, then submit one application for the tower and bridge allowing a full an proper assessment by the public, stakeholders and the LPA's of the impacts.

I would ask that the LPA's reject the current phasing plan and not discharge Condition 4.

[Redacted text]

Extract from Contruction Method Statement Page6

The indicative construction programme for the MRW is presented below:

Timeline	Construction activities
2024	Wetlands Earthworks & structures Culvert Southern Access Road
2025	Main Embankment Earthworks Reservoir Pipe Culvert & Valve shaft Control House
2026	Main Embankment Earthworks Control House Hard Landscaping
2027	Main Embankment Earthworks
2028	Main Embankment Earthworks Hard Landscaping
2029	Wet Commissioning Hard Landscaping Soft Landscaping
2030	Wet Commissioning Soft Landscaping Forestry England track raising & culverts
2031	Wet Commissioning