

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

Hi Narinder,

Further to my email dated 29 May regarding the application 11 changes for the reservoir site, please find attached my objections and comments in relation to application 12.

The objections and comments submitted in relation application 11(black & blue text) remain valid for application 12. However, I have reviewed the additional supporting documents and drawings submitted with application 12 and added in green text additional objections, concerns and comments in relation to;

- Application drawings (Section G) – including objections and particular concerns in relation to drgs. 0001, 0002, 0004, 0005, 0006 & 0013 (pages 25 to 35)
- Landscape & Visibility Assessment – not robust (Appendix B)
- Biodiversity Assessment of Impacts – not robust (Appendix C)
- ES Addendum 2024 – use of unsound assumptions & statements (Appendix D)

I apologise that this makes it a very long response for you to consider, but these are very significant changes to the approved reservoir plan, and the implications need to be carefully considered by the LPA. I hope that my comments will help draw attention to the main areas of concern and where additional information is needed before an informed decision can be made by the LPA.

Once again I would be grateful if you could share the attached document with the EHDC & HBC Landscape Specialists, especially in relation to comments on the revised design drawings (Section G), and the concerns with respect to the Landscape & Visibility Assessment not being robust (Appendix B)

Kind regards,
Tracey

Summary of Objections & Concerns

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 of the attached document.

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 not shown on the south side of the embankment crest road
- D4. Planned paths not 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.