

## Confirmation of objections

### Reservoir Embankment changes & inclusion of an offshore valve tower

Phase 3 - Planning references: HBC APP/24/00311      EHDC ref: 51680/11

Section 73 - HBC APP/24/00312EHDC ref: 51680/12

Narinder,

Thank you for advising me that some revised drawings have been added to the planning portal for these two applications. I reviewed the revised drawings added and on 2 October and while a few errors have been corrected, there is little substantive change to the majority of the drawings, as a result my previous comments remain valid. I have also provided some additional comments on the revised drawings in Annex A attached.

As no additional information has been provided to address my objections and concerns they all remain valid. What had been holding objections in my previous response on both applications submitted on 3/6/24 now need to be considered as objections to the application. A copy of my previous response is attached for ease of reference.

In addition to the objection to moving the valve tower offshore for the reasons set out in Section A1, G8, G9 & Appendix A of my previous response attached.

I object to the significant change in position/ width and the extension of the eastern embankment to the north. The developer has not provided a general arrangements plan (including landscaping) which shows how important ancillary features can be accommodated in a sensible and safe way, without any direct or indirect impact on the existing trees or new planting that forms the critical eastern wildlife corridor (further detail on the concerns set out in Section A2 & G6)

I object to the revised siting of the eastern embankment which now directs operational vehicles from the crest road or toe road to exit onto the eastern multi-user path as this is a significant concern on this narrow path used by pedestrians, mobility scooters, cyclists & horses) with blind bends (see previous comments Section A2, G1 b, c & iii, Appendix D sections c1 & c2).

I object to the significant change in position/ width of the western embankment. The developer has not 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 (see previous comments Section A3).

I object to the permanent loss of additional stream length, wet grassland & priority rush pasture habitat caused by the movement of the southern embankment further south, as no additional mitigation or compensation has been proposed to offset the new losses (see previous comments Section B1 & Appendix C).

Note: I have also objected separately to the discharge of Condition 36 relating to Ecological Mitigation, Compensation & Enhancement for Phase 3 in my email to the LPA's dated 18/9/24.

I object to the change in size & position of the Control House, in conjunction with the change to a 1 in 9 embankment slope in this vicinity, as no mitigation measures have been proposed to address the resultant significant increase in visibility of this 6m high building in this sensitive area alongside the historic conservation area (see previous comments Section C1, C2, G1e & G4).

I object to the lack of detail provided on the impacts of the changes to the reservoir design during drawdown and what will be visible (see previous comments Section C3 to C7).

I object to the lack of a robust landscape and visibility assessment for the significant changes to the reservoir design, especially in relation to the change to an offshore valve tower and increased exposure of the Control House. The top of the railings on the valve tower will be 1.8m above the embankment crest path level (40.5m), 2.8m above top water, with even more of the tower exposed during operational drawdown events. The revised outline masterplan drawings indicated the tower will be about 20m offshore, so it will be highly visible from the embankment crest path in the SW, the SW viewing platform and The Avenue viewing area. The tower will be visible from vantage points all around the reservoir (including from the Visitor Centre), and the eye will be drawn to this very urban feature in an otherwise rural historic woodland landscape (see previous comments in Appendix B, pages 40 to 46)

The Design Parameters (page 4, Eng & Design Report Addendum) reserved the right for the embankment still to move a further +/- 20m horizontal range from the crest shown on the Main Embankment Layout Drg. 4002. I am not clear as to whether this also allows movement of the embankment toe. I am concerned that this could result in more direct & indirect adverse impacts than currently shown on the drawings. I believe that the original hybrid consent only allowed a horizontal range for movement of +/- 2m for the embankment toe. Given that the site investigation phase and test embankment have already been completed why can't the embankment outer toe locations be fixed now? If the LPA is minded to grant permission they should not permit additional changes to the embankment toe location beyond 2m without a new planning application, with no further movement of the outer embankment toe permitted to the east or west, where there is already concern about the impact of changes to the space available for the critical eastern & western wildlife corridor.

As previously stated, the LPA should exclude Drg.002 showing a two way 6m wide southern access route from any consent granted, as this will be dealt with as a separate application, and it must be left open for a more appropriate design in keeping with the rural setting to submitted (see previous comments G2 & G3)

I maintain that the applicant should be required to provide details now to the LPA of any secondary means of access which will be required to the offshore valve tower, as the appearance and health & safety issues are material to the determination of this application (see previous comments Page 1, Section C8 & E). The tower and its means of access are intrinsically linked and should not be determined separately, as the full impact of the offshore valve tower cannot be assessed until you know what the access will be.

Given the delay to the construction programme and confirmed adverse impact on the local community the LPA should require additional mitigation from the developer to improve public access in the SW at Memory Park and to improve the linkage from Memory Park to the Staunton Country Park parkland/ lake area for the duration of the construction (see previous comments/ proposal Appendix D at Section G on page 52/53).

I hope that you and the Planning Committee will take account of my objections and the more detailed comments on the drawings and supporting documents submitted with the application which were set out in my previous response attached.

Kind regards,



## Annex A

### Comments on revised drawings placed on HBC planning portal 2 October 2024

#### Drg.0001 (PO4) Reservoir Outline Masterplan

A permissive path has been added in the SW on the west side of the stream to Gammon Hill. This only reflects what is already present. It does not address the issue raised of providing a safe route for people/ families to get from the SCP Parkland east of the stream up to the reservoir embankment, a very obvious desire line which needs to be addressed. A path was included on the original hybrid Outline Masterplan, as it was recognised a route would be needed to stop an inappropriate desire line being created through the wet grassland mitigation area alongside the stream channels. The path should be provided on the drier east side of the stream and up the SW embankment to control access in a way that will minimise disturbance of sensitive habitats. A path in this key area would also facilitate a very pleasant circular walk from the lake at SCP to the SW of the reservoir site, then east along the embankment (top or bottom) and back down the Avenue path into SCP, optimising linkage to existing well used paths. The path now shown west of the stream cannot provide this safely as there is no bridge on the reservoir site boundary.

The yellow permissive path in the west has been moved north out of the trapezoid woodland to address previous concerns, but the gate to the access is still shown in the wrong place. The gate should be located where the existing temporary compound access gate off Swanmore Road is, just north of the existing bus stop. It must be located to avoid the need to breach the established western wildlife corridor vegetation.

Other features are still missing from the masterplan including the north part of the Phase 1 woodland advanced planting and the proposed new eastern stream reach. See previous comments Section G1 on drawing 0001.

#### Drg.0004 (PO4) Landscape Plan Control House

Security fencing (3m) has been added to the east & west elevation, but not to the north elevation of the Control House roof. What prevents access to the roof from the north?

No local change to the embankment slope or tree planting has been made to address the visual impact of the adverse changes to the size of the control house, reduced embankment slope exposing more of the walls, and movement of the control house north further away from Round Wood which would have helped with screening, despite this location being within and visible from the historic conservation area.

#### Drg.0006 (PO3) Landscape Plan Gipsies Plain

A few amendments have been made to show some of the missing details, but not all, see previous comments on Drg.0006. The critical area to the north where the embankment has been extended by 60m as part of the Phase 3/S73 application is still not shown, making it impossible to assess how the landscaping can enhance the eastern wildlife corridor, and whether operational vehicles can safely be accommodated along the eastern perimeter multi-user route as now proposed in the Phase 3 layout. How can the LPA determine the application without this information given the significant changes to the embankment in this area.

Note: the plans submitted to discharge Condition 28 soft landscaping for the Phase 3 embankment do not show any additional detail either.

#### Drg.0011(PO4) Main Embankment Landscape Plan

- a) A fence is only shown on the north side of the crest path. This means that there is nothing to separate grazing animals on the embankment slopes from the public, including dog walkers. This is not appropriate and will lead to conflicts. It also means the public, dogs and bikes have access to the southern slope of the embankment, allowing desire lines and erosion which gives rise to additional risks. This needs to be addressed by having a suitable stockproof fence on the south side of the crest path.
- b) The key has been amended to the drawing indicating the fence at the top and bottom of the embankment is post and rail, whereas elsewhere on sections it was indicated correctly to be stockmesh to allow management of the grassland slope by grazing. Stockmesh is needed at the top and bottom of the embankment to facilitate essential grazing management of the wildflower grassland, perhaps the key text is attached to the wrong symbols and the blue dash and brown dash line detail should be swapped round?
- c) While a yellow permissive path has been added linking Cedar Drive on the SE to the embankment crest, the path is not shown fenced off. Stockmesh fencing will need to be shown on either side of the path up the embankment.
- d) No yellow path is shown traversing the SW embankment allowing people to exit the SCP parkland east of the stream and gain access to the reservoir crest path. This was included on the original hybrid Outline Masterplan, as it was recognised a path would be needed to stop an inappropriate desire line being created through the wet grassland mitigation area alongside the stream channels. The path should be reinstated on the east side of the stream and up the SW embankment to control access in a way that will minimise disturbance of sensitive habitats and allow safe/ controlled access up the embankment.

#### Drg.0020(PO6) Outlet Works Valve Tower & Culvert General Arrangements/ Sections

While some additional text has been added to confirm the location of the screens in relation to the tower outlets, there is still a lack of detail on drawdown levels and what will be visible in a drought and full drawdown conditions. Bar spacing on screens is still described as 150mm which is too wide as it would allow a small child's head to fit through.

The embankment crest level is shown on Section A as 41.1m, suggesting it is the same as the concrete top to the offshore valve tower. Whereas information submitted with the application indicated the crest road is lower than the concrete top of the tower at 40.5m, with this confirmed on the landscape drawings for Gipsies Plain, Avenue Staircase & SW Viewing Platform plan. This is important when considering the visual impact of the tower, as when taking into account the railings on top of the tower, the crest road will be 1.8m lower than the top of the tower. The top of the tower railings will be 2.8m above top water level, with more of the tower exposed during operational drawdown.

#### Drg.0040(PO1) Valve Tower Elevations

I hope this new drawing will be useful to Planning Officer and Landscape Specialist in showing that the offshore tower will be highly visible from key view points around the reservoir, including from the SW Viewing Platform, & Avenue Staircase Viewpoint. The viewer's eye will be drawn to this urban structure within the rural landscape. Unfortunately, the drawing still lacks the necessary detail for the LPA, councillors and the public to fully understand the impacts/ risks of siting the valve tower offshore;

The embankment crest path is not shown on the southern elevation, as a result it is not clear that the concrete tower top is 0.6m higher, and top of the railings are 1.8m higher than the crest path, which at its closest point is only about 20m away from the embankment crest.

Only the top water level is shown on the elevations, not the operational drought drawdown level or full drawdown level. Given the reservoir is a drought resource this is significant information that should be provided to the LPA to aid their assessment of the visual impact and accessibility of the tower during different operational drawdown scenarios.

Remembering that when the low level draw-off point is reached water levels will continue to drop due to evaporation in a drought.

No security measures are depicted to show large signs and spikes etc. needed to deter unauthorised access to the tower. A post and rail fence as shown will not prohibit unauthorised access, any additional security measures needed will be ugly and should be shown.

Nor is it clear where the gate for boat access to the tower will be and how this is accessed safely and secured. If steps are provided this will also allow unauthorised access by children and drunks.

No overhang is shown at the top of the tower, a previous drawing suggested there would be an overhang on some elevations. Will there be an overhang and what will this look like?

The finishes for the surface of the tower are not shown or labelled. Will they be smooth? Could they be climbed?

The surface covering for the embankment slope are not shown on the sections. During drawdown if the tower is only about 20m offshore there will be a strong draw for children and others to try and walk out to it. What new hazards will this present? (slippery rocks or deep mud?)

11 October 2024