

Havant Thicket Reservoir - Phase 9 Planning Application - APP/26/00574

Visitor Centre, Bird Hide, Hub Building & NW layout Reserved Matters

I **object** to application APP/26/00574 for the Visitor Centre, Bird Hide, Hub Building and North-west layout of the reservoir site for the following reasons;

- The unnecessary siting of the Visitor Centre within wetland compartment 4 conservation area where it will result in increased disturbance to wildlife which has not been appropriately assessed (Section 1 and Appendix D).
- The provision of external terraces/ walkways, especially on the south-east and north-east wetland side of the Visitor Centre building (Section 2).
- The small size of the education hide and failure to optimise the layout/ design to make this a multi-user dual space for the benefit of families, the elderly and disabled users, with the hide not being fit for purpose due to the lack of internal circulation and mobility turning space in the viewing area (Section 3).
- The inadequate space allocated for the ground's maintenance store in the Visitor Hub building, with insufficient storage and no workshop area for staff/ volunteers, as well as no direct vehicle access (Section 4, Appendix F).
- Not complying with multiple reserved matters design criteria set out in the hybrid outline design permission. Further detail on non-compliance is set out in Appendix A.
- Not provided adequate barriers to stop people and dogs gaining access to the wetland conservation area shore, nor the wetland retaining structure islands.
- The material change to the proposal for 'Out of Hours Use' of the facilities (see below & Appendix B)
- Missing, incomplete or inadequate information that should be provided before the application is determined as it is material to the decision (Appendix C).

The hours of use of the buildings and the car park have not been specified, but it is clear from the information in the Design and Access Statement provided by the applicant that evening use is planned. With references made to fine dining, evening bar serving area, and opening up the education space out of hours to make a larger restaurant venue (see Appendix B).

The proposal to open the Visitor Centre after dark is material to considering its siting, layout and design, especially in terms of the need to reduce the impact on biodiversity and nighttime ecology. A building with a walkway and terraces over water that needs to be lit at night will have a greater impact with both light and noise reflecting off the water surface causing greater disturbance to biodiversity over a wider area. Page 34 of the Design and Access Statement shows the intended layout 'out of hours', including the use of the external terraces and walkways. Further information on where you can find the applicants references to out of hours use and the concerns about this are provided in Appendix B.

The outline design for **the original hybrid planning application assumed no evening use of the Visitor Centre to minimise the impact on the nighttime ecology**, as part of the environmentally led design, including no traffic movements through the ancient woodland at night. Any evening use is therefore a material change that must be considered as part of the environmental impact assessment for the Visitor Centre, requiring detailed consideration of the traffic impacts, landscape and visual impact (including on the Grade II listed Park & Gardens, especially from The Avenue viewpoint), biodiversity impacts including on ancient woodland (including commuting routes between Havant Thicket and Bells Copse), valuable wetland habitats and the species that use them (bats, badgers, nightjars, glow worms etc.). If evening use is planned it is even more important that the building should be located to help minimise the impact on ecology and that has not happened. **The island location selected for the Visitor Centre building will increase adverse ecological and visual impacts and should be rejected.**

If the Visitor Centre were to be open after dark, then the car park and access road barriers will also have to remain open. That will significantly increase the risk of anti-social behaviour involving vehicles, motorcycles and youths abusing the car parks, as well as an increased risk of fly tipping along the main access route through the ancient woodland. The clear intent at the time when the original hybrid application was granted permission was for the applicant to provide barriers at the entrances to the site access roads to prevent any vehicle access after dark as anti-social behaviour was a key concern of both stakeholders and the community. Planning Condition 18 specifically required; “The barriers should also be provided at the northern and southern entrances and **locked at night time to prevent anti-social behaviour.**”

I have set out below more detail on the specific objections, concerns and comments on the Visitor Centre siting, layout & design (Section 1 & 2), Bird Hide size & layout (Section 3), as well as the size and location of the ground’s maintenance store within the Hub Building (Section 4). Further comments and concerns on the information provided to date in relation to the NW corner application details are provided in Section 5.

If despite these significant objections and the importance of the missing information to evaluating the impact of the proposed development (including no EIA for out of hours use of facilities, no robust assessment of the increased disturbance to wildlife in the wetland that will be caused by the off shore location of the Visitor Centre, and the lack of a day/ nighttime visual impact assessment) **the LPA is minded to approve the application based on the proposed layout the following conditions should be applied.**

- I. No external terrace or public walkway shall be located on the south-east or north-east wetland conservation area side of the Visitor Centre building. A revised layout for the external terraces meeting these criteria shall be submitted to and approved by the LPA before construction of the Visitor Centre commences.

Reason: To reduce human disturbance to the wildlife in wetland compartment 4 and permit unobstructed views from the Visitor Centre cafe windows across the wetland allowing emersion and engagement with nature under all weather conditions.

- II. No external lighting to be located on the south-east and north-east wetland conservation area side of the Visitor Centre building. Only task specific external lighting to be located elsewhere on the building which is designed in a way to minimise light spill and reflectance off the water.

Reason: To protect the nighttime ecology.

Note: Details recently submitted for discharge of Condition 20 provides no information on the Visitor Centre lighting.

- III. Require provision of details for approval by the LPA of a Bird Hide with a larger footprint suitable for dual use by a guided group and the general public, including simultaneous use.

Reason: To provide a larger hide more in line with the original maximum size parameters of the hybrid outline permission that is optimally designed for both school education and public use including families the disabled and elderly.

- IV. Hours of use condition to ensure that the Visitor Centre and Hub Building cannot to be used after dark.

Reason: To protect the nighttime ecology. Noting that there has been no Environmental Impact Assessment for use after dark.

- V. Requirement for the southern and northern car park vehicle barriers to be closed and locked after dark prohibiting the use of the car parks at night.

Reason: To protect the nighttime ecology, remove the need for lighting and reduce the risk of anti-social behaviour. The permission could allow for up to 12 evening (or dawn) events for a maximum of 20 people to take part in guided educational walks. For example, guided walks to search for bats, nightjar, glow worms or moths.

- VI. Require provision and approval of details for a larger Grounds Maintenance Store & Workshop at least equivalent in area to that originally shown in the hybrid outline application/ permission within the Control House building, with the layout ensuring direct vehicle access to the store is available.

Reason: To make provision for safe and secure storage of grounds maintenance equipment and a workshop space with good vehicle access as previously provided for within the approved hybrid outline planning application.

- VII. Require provision and approval by the LPA of details of how all site entrances to the NW area of the reservoir site, whether they are for vehicles, horses, cyclists or pedestrians will be designed to prevent unauthorised motorcycle access. The approved measures must be in place before the NW area opens to the public.

Reason: To prevent motorcycle access to the NW area of the reservoir site in order to protect the health and safety of legitimate recreational site users of the paths. This includes providing details of how the vehicle entrances to each carpark will be protected.

*Note: Planning Condition 18 on the original hybrid planning consent for the reservoir required; “details of **measures to deter motorcyclist access** shall be submitted to and agreed in writing by the Local Planning Authority.” With the reason given as; “In the interests of highway safety, visitor amenity and safety and protection of new and existing habitats.” This information has not been provided by the applicant.*

- VIII. Details of the phasing, programme and triggers for installation of play equipment to be provided to the LPA for approval before work on the NW corner of the reservoir site commences. This should include the programme for the delivery of spaced play around the 2 km walking route within Havant Thicket. All play equipment shown on the approved plans, or equivalent equipment agreed by the LPA, to be delivered within 3 years of the opening of the NW area to the public.

Reason: To ensure that sufficient play equipment is provided on the opening day of the NW area and further equipment to be agreed by the LPA is delivered in a timely manner.

- IX. Details of measures to be used to prevent dogs and people from accessing the shoreline of wetland compartment 4 and the retaining structure islands shall be submitted to the LPA and approved before the commencement of works in the NE area of the reservoir site. All agreed stockproof fences, hedges and barriers to prevent access to the wetland must be in place before the NW area opens to the public.

Reason: To protect the sensitive wetland habitats and ecology from disturbance.

- X. Details of the siting, access and construction of the slipway as well as confirmation as to what it is to be used for to be provided to the LPA and approved before construction in the NW area of the reservoir is commenced.

Reason: No detailed currently provided on the construction, nor use of the slipway shown on landscape masterplan drawing which forms part of the development.

1. Objection to the siting of the Visitor Centre within the wetland & other specific concerns

- a) There has been no robust or balanced assessment provided to review the advantages & disadvantages of siting the visitor on the shoreline as opposed to within the wetland. Assessing alternatives is a requirement of the EIA Regulations and a balanced assessment of alternative locations for the Visitor Centre should have been provided with the application. Especially as significant concerns about an island location were previously raised by Councillors and the public at the outline hybrid planning application stage and Bob Taylor committed to working with the community to find a solution. A summary of the impact of alternative siting of the Visitor Centre as an island and a shoreline location is provided in Appendix D.
- b) The offshore location results in the loss of valuable wetland habitat below the footprint of the Visitor Centre building and extends the zone of disturbance much further out into the wetland than is necessary. This is demonstrated on the maps provided in Appendix D which show the smaller zones of disturbance if the Visitor Centre had been located on the shore of the wetland, including causing less disturbance to the area of water in front of the bird hide. The zones of disturbance for the shoreline and island Visitor Centres were produced with the help of a wetland specialist with more than 30 years' experience of creating, managing and monitoring freshwater wetlands in South Hampshire.

Note: Page 10 of the Statement of Conformity with the Environmental Statement confirms for biodiversity that the Visitor Centre proposals "were not assessed in detail at the outline stage." The impact of the siting, layout and design must now be considered in detail.

- c) The Applicants consultant suggests that as the reservoir is not yet present there is no incumbent bird community to disturb by placing the visitor centre within the wetland (Statement of Community Involvement page 5). This is to miss the point. It is not acceptable to ignore the loss of biodiversity benefit that will result from the Visitor Centre being placed within the wetland because that habitat/ wildlife is not yet there. The habitat lost by placing the Visitor Centre in the wetland and the extended zone of disturbance must be properly considered and assessed as it can be avoided with a better more environmentally led layout/ design. The EIA Regulations require alternatives to be assessed. The applicant as not followed the mitigation hierarchy when siting the visitor centre to avoid the impact on the wetland.
- d) The assessment of disturbance zones at the reservoir wetland should not be based on studies for an open estuary with extensive mudflats, as that is not a comparable setting to the open water habitat to be provided at the reservoir. Birds and other wildlife behave differently in open water, or when feeding/ roosting on islands surrounded by water, compared to the how they would behave on exposed mudflats.

- e) The applicant's consultant has prejudged the assessment of a shoreline location by stating that it would require high fences and lighting at night for security reasons. That has not been substantiated, and I do not agree that is the case. Since 2008 when I first became Project Manager for HT Reservoir Project (now retired but still visiting visitor centres) I have visited over a hundred visitor centres and I cannot recall one that was surrounded by high fencing, even those in sub-urban areas. What is needed is intelligent and robust design of the building to ensure the risks associated with antisocial behaviour are designed out. Security measures such as CCTV and a response mechanism will be needed whichever location is selected.

Note: Excellent views across the wetland/ reservoir can still be achieved from at least 2 sides of the building if sensibly positioned on the shoreline. Views are not necessary from the other side of the building where the toilets, stores & the kitchen can be located.

- f) Anti-social behaviour will not be eliminated by an offshore design. The floating design will be a lure for youths and adults, especially in hot summers. Those wishing to jump or dive off the floating pontoon will not be put off by the prospect of getting wet to get access out of hours as they plan to get wet anyway. The high number of water related fatalities during the hot summer of 2026 should be a warning of the increased risk that results from providing a structure over water. I hope that the council will heed that warning and reject the application.
- g) The choice of oak shingles (tiles) on the walls may be sustainable but is unlikely to be robust against vandalism. The design criterion required durability in a challenging public setting and in my view this has not been achieved.
- h) Not adequately considered the impact on setting and views. Page 24 of Planning Statement refers to the design requirement to consider views (including from the Grade II listed park & gardens) along with other design principles (see Appendix A). The island siting of the visitor centre will result in a greater visual impact with a metal roof reflecting the light and 3 large turrets that make the building look like a cruise liner stranded in the wetland, as can be seen below in the Figure 2 illustration taken from page 9 of the Planning Statement.



A key design criterion was to make the Visitor Centre integrate with the rural landscape character and ancient woodland setting, instead the building makes a statement in the landscape, with a stainless-steel roof and 3 steeply pitched turrets to 'provide internal drama', it is at odds with the rural woodland landscape,

it will stand out in views from around the reservoir site. Yet the applicant has not provided a visual impact assessment.

- No visual impact/ photomontages from key vantage points, including The Avenue viewpoint (Grade II listed Park & Garden), western embankment, and bird hide locations.
- No visual impact when the reservoir is drawn down and the visitor centre sits on mud, no longer floating. The minimum water levels shown on the application drawings are not representative of a reasonable worst-case scenario with the reservoir drawn down.
- No nighttime visual impact assessment, with no photomontages to show what the Visitor Centre will look like when lit up at night, including from the SCP Terrace, the Avenue viewpoint, or residential properties.

The visual impact assessment should consider all 3 new buildings and ancillary structures which form part of the application, including the Bird Hide and Hub.

- i) The design does not minimise the whole life costs and maintenance requirements, a key design requirement. A building over water is harder to service, foul drainage has to be vacuum pumped, services are exposed and more vulnerable, there is no vehicle access so everything for the staff and café, including waste has to be carried on/off via the boardwalk, increasing manual handling risks and costs (see Appendix A).
- j) An on-water location provides no future proofing. In recognition of stakeholder concerns and those of other reservoir visitor centre managers that there had to be space and flexibility for future proofing, Portsmouth Water committed to ensuring the design of the Visitor Centre was future proofed to enable expansion, if necessary, in the future. This design requirement has not been met (Appendix A).
- k) Lighting the access walkway and building after dark will add to disturbance of the nighttime ecology. The NW corner of the reservoir site and adjacent woodland tracks are used by nightjar, woodcock and bats. Lighting directed down to reduce light spill will hit the water and reflect over a greater distance than if the Visitor Centre were on land causing increased disturbance to wildlife.
- l) There is no delivery vehicle access, nor emergency vehicle access to the Visitor Centre. Access for emergency vehicles was a design requirement which has not been met. The offshore Visitor Centre is accessed via a pedestrian walkway. This means that all supplies needed and waste generated must be carried or trolleyed in and out. The resultant need for storage in the Hub building where there is vehicle access will result in double handling of all supplies, which will add to the lifetime costs, as well as the health & safety risks.

Note: When visiting the Attenborough Centre island visitor centre referenced by the applicant, I asked the manager if given the opportunity to start again would he choose an island or shoreline building location? Without hesitation he indicated on the shore, saying that would be more flexible, including when dealing with school groups.

The current Environmental Impact Assessment is not adequate for this application. The environmental assessment of the original outline design did not fully consider the biodiversity impact, historic landscape, landscape & visual impact for this element of the design as there was no detailed design for the Visitor Centre and the location had not been fixed, making assessment impractical. Nor was the traffic impact or lighting effect at night assessed as it was assumed the Visitor centre would be closed at night.

A full Environmental Impact Assessment should be undertaken for the detailed design, which now includes 2 separate buildings, to fully assess the impact and that should include a meaningful and robust assessment of the advantages and disadvantages of siting the Visitor Centre on the shoreline compared to an over water location.

The Biodiversity Mitigation and Compensation Strategy for the Havant Thicket Reservoir Project produced by AtkinsRealis in August 2024 (HTR-ATK-ZZ-ZZ-RP-Y-0001) was based on a number of core elements for on-site mitigation and compensation, as set out within the Outline Biodiversity Mitigation and Compensation Strategy. This included the **requirement to create an environmentally led design based on the mitigation hierarchy approach of avoid the impact first**, then minimise, or compensate. By placing the Visitor Centre within the wetland conservation area, the applicant has failed to;

- follow the principles of an environmentally led design;
- develop a design based on the mitigation hierarchy approach;
- avoid the direct loss of wetland habitat under the footprint of the building, and
- locate and design the visitor centre & terraces to minimise wildlife disturbance.

The application should be rejected.

2. Objection to the provision of external terraces and walkways at the Visitor centre

I object to the inclusion of terraces/ walkways around the external edges of the visitor centre, especially the south-east and north-east wetland side of the building as this will;

- a) Increase disturbance of wildlife in the wetland (noise & movement of people).
- b) Increase litter blown into the wetland from tables.
- c) Increase the need for external lighting over those walkways/ terraces at night if evening use of the VC is planned which will add to disturbance of wildlife.

Downward lighting that can reduce impacts on land would reflect off the water extending the zone of impact into more of the wetland. The Design & Access Statement page 34 confirms the intent for these terraces to be accessible out of hours.

Excellent views will be available from within the VC with large windows providing the wow factor and allowing a connection to nature without causing unnecessary disturbance, as is provided at many successful visitor centres including the WWT Reserve at Arundel. Terraces are not an essential component, a terrace is certainly not essential on the south-east side overlooking the wetland, where the widest terrace is currently shown. In fact, if the south-east terrace is removed there will be better unobstructed views of the wetland and reservoir from the cafe window, allowing users to be immersed in nature in winter and summer regardless of the weather.

Removing the terrace on the NE side of the Visitor Centre will reduce disturbance to the area of the wetland closest to the Education Bird Hide, giving more chance of wildlife being visible from the hide, increasing the educational opportunity/ experience.

The reality is that it will not be possible to stop children running up and down the external wooden walkways/ terraces or throwing items into the water. If terraces have to be provided over the water (which they don't) they should only be provided on SW and NW side of the building, where their use would cause less disturbance to the main wetland conservation area.

At the Attenborough Centre they have experienced problems with the hydraulics of the drawbridge not working in freezing weather preventing access to the Visitor Centre, as well as attempts to vandalise the cabling. While a drawbridge may help reduce access to the Visitor Centre at night, it will not prevent it, and nor is it infallible.

Providing the Visitor Centre on a floating pontoon with terraces over water increases the health and safety risks (see Section 1f)

3. Objection to small size & layout of the education bird hide which does not optimise community or wider educational use

The bird hide is disappointingly small and not designed for dual use. When I was the Portsmouth Water Havant Thicket Reservoir Project Manager (before retirement) we repeatedly assured stakeholders and the local community in response to questions at meetings that the education hide would be designed to have a multi-purpose use to optimise the benefits to the community. Enabling families, the elderly and disabled to use the hide close to the carpark to maximise its benefit, and to ensure those that could not reach hides further away would still have the opportunity to use a bird hide.

Unfortunately, the design and layout of the hide have focused on providing an educational use, instead of optimising the size and layout to facilitate a dual use. Multipurpose hides are provided successfully at many RSPB reserves (e.g. Leighton Moss) and Wildlife Trust sites (Blashford Lakes, Hampshire) and the LPA should ensure that a multipurpose (dual use) hide is provided at Havant Thicket Reservoir. Photos of hides from other sites providing multi-purpose use and showing the greater circulation space needed are included in Appendix B.

Confirmation that the hide is not intended to be used for dual use with general public access is provided in the Disability Access Statement (Building Regulations Part M Compliance) which states the education bird hide;

- is generally used only by one group at a time (page 4)
- the entrance door operated by a card swipe, coded entry or remote control (page 5). From this it is clear the hide will be kept locked.

The Disability Access Statement also refers to; visual and audible warnings are provided to warn people of the hide doors automatic operation when both opening and shutting. This is of concern in terms of wildlife disturbance, an audible alarm at the bird hide should be avoided and a visual warning would have to be carefully sited to prevent disturbance. The reference to the bird hide building having no lobby (page 5) or no internal lobby (page 6) is incorrect as the separate 'education space' room provides that function.

Specific concerns about the current hide design;

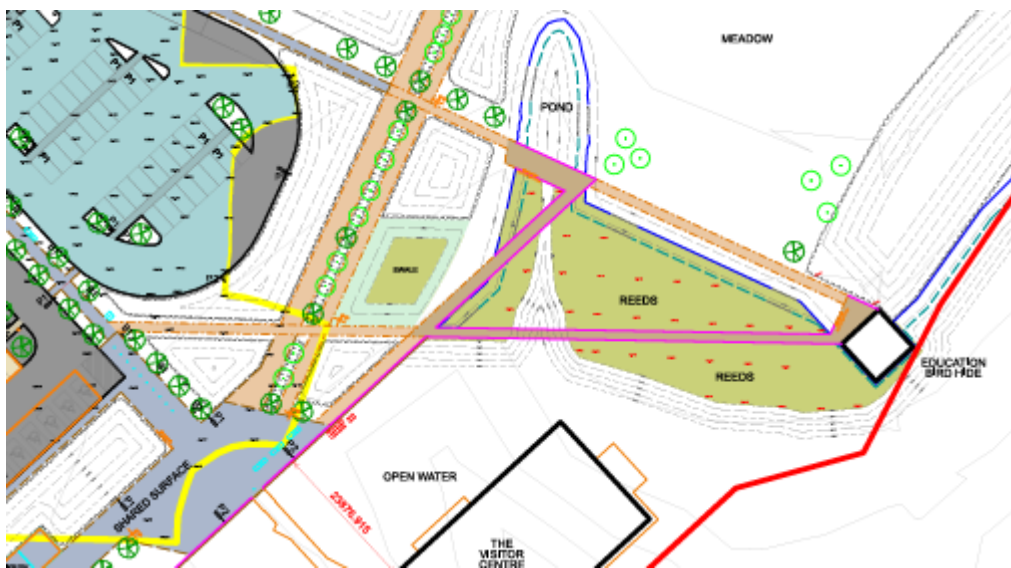
- a) The hide is too small (7.7m x 7.7m) creating a wasted opportunity to provide a more useful facility, the parameters from the original reservoir planning application allowed for a much larger building envelope of 9m x 20m (*Planning Statement page 23*).
- b) A larger longer structure orientated along the shore of the wetland in a v-shaped frontage would provide more capacity and greater viewing opportunities over the wetland.

- If the NE and SE frontages were pivoted more to be angled to the water frontage (v-shaped) the hide would provide better viewing opportunities over the wetland, especially in different light conditions.
- c) The hide is only designed for a half class of 15 pupils; there is no indication that it has been designed to be dual use (multi use) and its layout is not optimised for that. A longer hide would open up the opportunity for more seating, a second access door, and provision of a folding screen to separate off the education area for a half class when needed, as is provided at Blashford Lakes. The photos in Appendix B of the hide at Blashford Lakes show the different design/ space provided at each end of the hide to allow a multi-function dual use.
- d) The circulation space within the viewing area of the hide is inadequate to allow visitors to sit at the benches and set up telescopes with tripods without blocking access/ egress. The hide is not fit for purpose in this respect.
- e) There is inadequate floor space to allow mobility vehicles or larger electric wheelchairs space to turn easily inside the hide. This does not appear to have been considered in the Disability Access Statement submitted in relation to compliance with Condition 13. The hide is not fit for purpose in this respect.
- f) There is contradictory information provided by the applicant in the window configuration of the hide. Page 46 of the Design and Access Statement referred to 'shutters open to provide discrete viewing slots to observe wildlife', but these shuttered slots (found in a typical bird hide) are not shown on the design drawings for the bird hide, only larger windows are shown. The photos of the existing education hide at Leighton Moss and Blashford Lakes show the different window configurations that provide opportunities for a variety of types of user. The large non-opening windows shown being ideal for school, other groups and families allowing great views but limiting the transfer of noise to the wetland. Whereas the slotted windows that can be opened are more suitable for people of all ages and abilities using binoculars, telescopes and cameras to view wildlife.
- g) One way glass should be provided in the larger hide windows to stop visitor arrival/ movement in the hide being visible from the wetland, as is provided at Leighton Moss and Blashford Lakes education hides, to minimise disturbance of wildlife and maximise the educational viewing opportunities. At present only 'bird protection glass is mentioned' to reduce the risk of bird strikes.
- h) There appears to be no provision for protection of the hide windows at night, such as roller shutters. This will leave the hide vulnerable to anti-social behaviour.
- i) The view over the wetland has not been optimised, with only one small window viewing NE. Additional windows should be provided to optimise viewing over the north area of wetland compartment 4.
- j) The reedbed shown to the SW of the hide will not be adequate to screen visitors approaching the hide to prevent disturbance, especially in winter when the reed dies back. In summer the height of the reeds when fully grown are likely to

obscure views of the wildlife. If the reed is cut regularly to maintain views its screening function on the approach would be much reduced.

- k) The boardwalk approach through the reed bed directly to the hide (see map extract below) needs to be moved away to join the main access path on land much further west of the hide, or removed altogether, as visitors walking on the boardwalk will disturb the wildlife in front of the hide on approach. The reed will not provide adequate screening of people on the boardwalk, especially in winter when it dies back, or has to be cut down close to the hide to maintain views. Page 18 of the Design and Access Statement refers to a triangle of access. Disturbance would be significantly reduced if there were only the one access path to the hide on land set back from the water's edge.

Note: Having an education hide is only worthwhile if there is something to view from the hide. If the wildlife is disturbed due to a poorly designed access the cost of the investment would not be worthwhile.



Note: The Design & Access Statement suggests the water depth at the reedbed will be 100 to 300mm. The reservoir margins will dry out in summer due to natural seasonal fluctuations, so the reedbed will not be deep enough to deter people and dogs from accessing the water's edge.

- l) A gate needs to be placed at a suitable point on the hide access path, well before the hide, with signage to make it clear that dogs are not permitted on the final approach path to the hide, nor in the hide.
- m) It is not clear if there are fences or barriers either side of the hide to prevent people and dogs walking round in front of the hide? A robust barrier must be provided.

Note: On the northside of the hide is an area of woodland planting on a raised mound (see map extract above), it is not clear if the tree planting will be fenced and whether the fence will connect to the hide to prevent people or dogs getting between the hide and the planted mound to the wetland.

- n) The 4.5m building height for the hide is completely unnecessary and being made of metal will reflect light increasing the visibility of the structure, including from

the Avenue viewpoint (Grade II listed Park & Gardens). The design objective was for the structure to blend in with the rural setting; it does not achieve that.

- o) A metal roof will make the hide very hot in summer and very noisy when it rains, the 4.5m metal roofed structure should be rejected.
- p) The hide roof drainage is described as a 'stainless steel spout for discharging rainwater' (page 53 Design & Access Statement). The hide drawings show the waterspouts terminating over the wetland in front of the hide. When raining the discharge of water will be noisy and obscure views across the wetland which is not a good design.

In summary, I object to the small size, layout and design of the bird hide because it is too small to meet the needs of the community and is proposed to be kept locked when not in use for education. It is poorly designed for disabled use, bird watching and photography, with inadequate nighttime security measures to address the risk of antisocial behaviour. Visitors on the approach path will cause disturbance and insufficient measures have been provided through intelligent design to prevent disturbance of wildlife. The hide as proposed is a wasted opportunity to provide a dual use hide which would optimise the use and benefit to the community, while allowing separation of an education space when needed.

Note: A more robust design would be to extend the landscape mound located to the north of the hide further south and conceal the hide structure within the mound, as has been done for the design of the Control House. This would maintain the functionality of the hide, allow great views out, while reducing the visual impact and risk of vandalism.

The image below taken from the Havant Thicket Reservoir Design and Access Statement submitted to the Local Planning Authority with the outline design in 2020 (Fig 6.7 & 6.18) shows the approach to a bunker style construction in a landscape mound and indicative palette of materials. This would allow most of the hide to be hidden within the mound, while any exposed walls could still be rammed earth as currently planned.



A central entrance with roller shutter doors for security could give access to a lobby area with 2 doors, supporting a dual use option, allowing the hide to be divided when needed for education, but at other times providing community use with both doors and ends of the hide accessible. The two ends of the hide could be separated by a fixed wall with a separating door that can be locked when an education group are in occupation, or by providing a built-in robust sliding partition which is shut only when necessary.

4. Provision for grounds maintenance store is inadequate

I object to the size and location of the ground's maintenance store shown in the Visitor Hub building. Intelligent design has not been used to think ahead to make adequate provision for this important facility in a safe way.

The original outline planning application made provision for a ground's maintenance workshop/ store in the remote Control House building which was large enough not only to store maintenance equipment (mowers, strimmer's etc) but was also big enough to be used as a workshop for staff and volunteers. Appendix F shows the 'Site Maintenance Workshop room' within the Control House building. When this element was removed by the applicant from the Control House design the LPA and stakeholders were assured that alternative provision would be provided in the NW area of the reservoir site. Unfortunately, adequate provision has not been made in the current planning application. The provision made is too small to be fit for purpose.

Specific concerns about the provision made for the Grounds Maintenance Store in the Visitor Hub building;

- a) The allocated store area is too small to serve its intended purpose.
- b) The store is shown as a walk-in cupboard no bigger than 2 small toilet cubicles, the same size as the cleaners cupboard alongside. The space shown is not large enough to store the mowers, strimmer's, volunteer tools (saws, spades etc.), safety equipment and signage needed for site maintenance.
- c) It is not large enough for use as a workshop by staff and volunteers to make repairs to equipment, bird/ bat boxes etc, dry wet equipment and clothes. With no provision indicated anywhere else for additional space.
- d) The store is shown on the same side of the building as the cafe kiosk opening. These uses are not compatible; the store should be on the rear of the building so that staff and volunteers can access it easily to load vehicles from the road without having to carry tools with blades etc. through the main family circulation area between the kiosk and toilets.
- e) Where will the fuel and oil needed for grounds maintenance plant and equipment be stored? The cupboard allocated does not appear to be suitable.

The location of the store should have been selected to be of adequate size and positioned to design out health and safety conflicts. Unfortunately, this has not happened.

Note: There is unlikely to be surplus space in the plant room to accommodate grounds maintenance equipment such as mowers, as the room will be sized to accommodate the energy centre, vacuum drainage system controls etc. which the designer has acknowledged is better placed on land than at the floating visitor centre.

If space is not provided for a suitably sized ground maintenance store and workshop then it is highly likely that a large metal container will have to be located on site later to meet this obvious need as soon as the site opens. A metal container would be very unsightly and vulnerable to theft of equipment, as the security system for the Visitor Hub (CCTV etc) would not protect it. Portsmouth Water committed to making adequate provision to avoid the need for such a container and the LPA should ensure the commitment is honoured by rejecting the current Hub Building layout as inadequate.

5. Concerns regarding the general arrangements of the NW area

5.1 I am very concerned about the **lifelong costs, viability and practicality of running the two separate buildings** shown on the Landscape Masterplan. There is a high risk that the Visitor Centre (VC) will become a white elephant for the site, as its location offshore will make it very difficult and expensive to maintain. If the intention of the NW layout is to reduce disturbance by drawing the families away to the play area and kiosk, then a big percentage of the site visitors will not be spending money in the visitor centre resulting in less income to pay for its expensive annual upkeep.

The **additional cost of staffing** is also a key concern, as having 2 buildings will significantly increase the number of staff needed to service the VC and kiosk areas when both are open. This will also make staff cover more difficult at times of sickness/ leave. There is a high likelihood that one of the buildings will have to close at quieter times. The obvious building to close to the public would be the VC as it will be more expensive to heat and run, which really defeats the object of having the VC. Surely, it is better to have one VC on land which accommodates everything that is needed that can be run by less staff and be more cost effective to operate. A VC constructed on the shore would still have large windows with great views out over the wetland and reservoir, while having the additional advantages of being closer to the play area, cycle shelter, bin store etc.

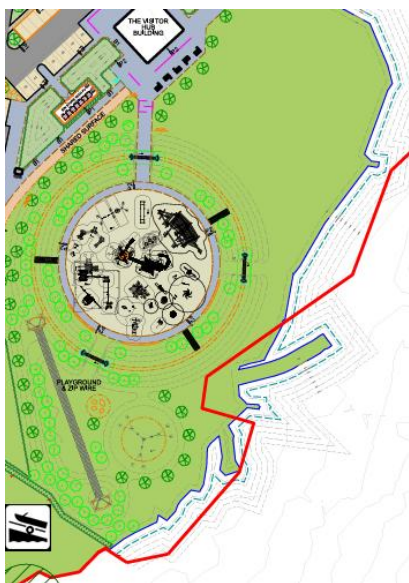
It is only the siting of the VC offshore that is driving the need for a second service building with kiosk. The need for a second building, extra maintenance, more staff and double handling of goods would be removed if the VC was located on the shore.

5.2 Robust fencing & hedging is not provided to prevent access to the NW shoreline of wetland compartment 4 from the busy recreational hub area.

Riparian plants alone will not be adequate to prevent people and dogs accessing the shore/ water, as a result there will be unnecessary disturbance to wildlife using the wetland and erosion of the shoreline vegetation.

The Landscape Visualisation illustration on Page 7 and 19 of the Landscape Design and Access Statement appears to show railings along part of the water's edge near to the play area (see extract below), but there is no secure barrier (e.g. hedge with

stockmesh fence inside) that would stop children or dogs accessing the shore of the wetland conservation area. This is needed for health and safety reasons near the play area, to prevent disturbance of wildlife using wetland compartment 4, and to prevent people/dogs getting to the wetland retaining structure islands which are only a short distance offshore. Noting that the spillways that separate the islands on the retaining structure that would normally help to discourage access to the islands will be dry during reservoir drawdown, so a robust barrier is essential to prohibit access to the retaining structure islands. The railings shown on the illustration below are not a robust barrier to deter access, but not even these inadequate railings are marked on the general arrangement drawings or Landscape Masterplan (see extract below), no barrier is shown along the wetland shoreline.



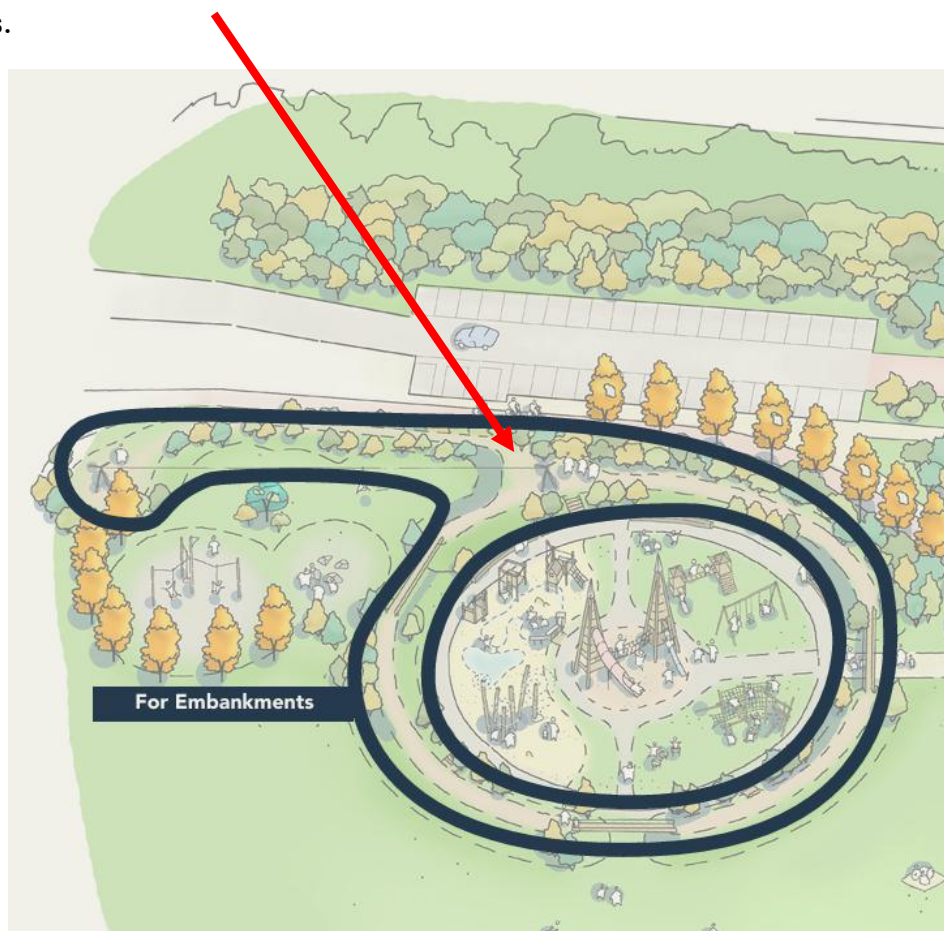
Left – Extract of HTR Landscape Masterplan shows no barrier/ hedge along the wetland shore

Rights – Hedge and fence installed at Arlington Reservoir to prevent dog/ people getting to the shore which was eroding riparian vegetation and preventing the habitat from establishing.

Note: The applicant may claim that the barrier to provided specifically to prevent access to the wetland retaining structure is outside of the red line. However, when I asked for the information on the barrier at the time of the retained wetland area application, I was told it was outside that applications red line and it would be provided with the NW corner reserved matters application. As this is the final application the details must be provided.

5.3 The artificial channel with the reedbed and pond dipping area NW of the Visitor Centre has no natural source of water and will dry out as reservoir levels drop. If the pond dipping platform is required for use all year round, then when reservoir water levels drop an alternative means of filling this area with water will be needed. No information is provided on how water levels will be retained in the channel.

5.4 No access path to the play area where there will be an obvious desire line; The page 27 extract provided below from the Landscape Design and Access Statement shows a path to play area from southern access path which is not shown on the main drawings.



If no path is provided visitors from Warren park, or those using the crest path and maintenance track arriving from the south, must walk to the Visitor Hub building then double back to access the play facilities. The reality is that they will take a shortcut and a desire line will form through the landscaping. The path linking the path from the south to the play facilities shown on the visualisation above should be added to the general arrangement and landscape masterplan.

5.5 Gap in multi-user route information for the area where NW Corner (Phase 9)

meets the Southern Access Road application area; There is a lack of detail showing how the paths in the NW area of the reservoir site connect to the paths that merge at the northern end of the Southern Access Road. Pedestrians and cyclists need to be able to safely drop down from the western embankment crest path onto the maintenance track, which runs parallel with the access road, and heads north towards the visitor hub. The detail for this was not provided with the Southern Access Road application and when this was queried the response was that the detail would be with the NW corner application, but it is not. Where the multi-user routes merge cyclists and pedestrians will be travelling in different directions at different speeds. A detailed drawing should be provided to address the following.

- How will merging routes at the north end of the western embankment be set out safely? (staggered barriers, markings on surface, different colour surfacing?)
- Will the path be wider at the point where the multi-user routes merge?
- Will there be a roadside barrier to prevent cyclists travelling down the embankment slope and emerging straight onto the road?

5.6 There is nothing on the drawings provided for the NW area to show how motorcycle access will be prevented at the new entrances. For example;

- Northern access barrier and Emergency Access Barrier Control drawings show boulders alongside the barriers, while these look aesthetically pleasing and would prevent a car by-passing the barrier, the boulders do not look sufficient to prevent motorcycle access.
- No barrier to motorcycles shown across the 3 new site entrances shown on the northern boundary of the NW area. For those which are pedestrian only routes this could be achieved using a kissing gate.

Note: Currently a ditch and stockmesh fence prevents access.

- No horse friendly motorcycle barrier shown at the new entrance located along the western boundary adjacent to the horse box parking area. The Design & Access Statement pdf page 79 refers to the bridleway connection by the horsebox parking area having 'no obstruction for riders'. The barrier to be provided will need to deter motorbikes while allowing a horse to step over.

Note: Currently a tree line and fence prevents access.

5.7 Vulnerabilities at the viewpoint / screen north of the bird hide; The view point is shown as ramped wooden boardwalk to a flat wooden decking area surrounded on 3 sides by Cortan Steel screens.

a) The raised structure looks very vulnerable to vandalism/ fires in this sub-urban location where there is a history of anti-social behaviour.

b) The woodland planting on the landscape mound either side of the viewing platform does not appear to provide a secure barrier linked to the viewing platform structure to prevent access from the path approaching the platform to the wetland shore. A gap is certainly shown down the south side, see map extract below. A robust stockmesh fence (or other barrier) must be provided to prevent access by people and dogs to the wetland. Ideally, dogs should not be permitted on the path approaching the viewing platform, nor on the viewing platform. This can be achieved with a gate and signs on the approach path.



Ensuring durability in a challenging public setting is a design requirement. More robust provision could be made by having a lower landscape mound between the two existing mounds, with a gentle approach slope, gravel path, ending at a 1.2m high curved wall facing the water, over which visitors could view. This would not require any wooden decking, would require a lower level of maintenance and could incorporate interpretation boards and wildlife art.

5.8 The general arrangements drawings do not show where different fence and barrier details will apply. While drawings are provided to illustrate the construction details for fences, barriers and hedges (Typical Landscape Detail 1 of 3 Drg. HTR-FIR-XX-ZZ-DE-L-4005-PO2) there is no general arrangements plan(s) that shows where each detail will be used.

5.9 After dark use of the play area; No barriers are shown to discourage access to the play area after dark. While the landscape banks around the play area are useful in some respects to screen the noisy activity from the wetland it does raise some other concerns;

- What thought has been given to how these areas will be used out of hours?
- Is there a risk that youths will gather in such an area obscured from the view of the main paths by the landscape mounds?
- How durable is the play equipment to vandalism and anti-social behaviour?

5.10 Details of the exact siting and construction of the slipway have not been provided. Nor has there been confirmation as to what the slipway is for and who may use it. The slipway forms part of the development description but is only currently shown as a symbol on the Landscape Masterplan. There appears to be no vehicle

access shown to the slipway on the Landscape Masterplan nor on the Hard Landscape Strategy drawing. If details are not to be provided with the current planning application, then there should be a condition requiring details (including access and use) to be provided to the LPA and approved before construction in the NW area of the reservoir is commenced.

5.11 Planting Strategy / early tree planting proposal insufficient

The Design & Access Statement (pdf page 61) refers to early planting of the proposed tree belt to the western edge of the site, which the applicant has indicated they would be keen to progress as soon as possible after planning approval. The absolute priorities for early tree planting should include;

- a) The provision of a hedge incorporating a fence along the western shore of the wetland adjacent to the main recreation hub (see section 5.2), to allow this to become established before visitors start using the play and picnic area. This natural barrier is essential to protect the wetland edge planting and enable it to establish but is not mentioned in the Planting Strategy (Section 3.4 Water Margins).
- b) The woodland on the landscape mounds to be provided along the western edge of wetland compartment 4, but this is not mentioned. Early planting of the woodland on the landscape mounds is essential to allow early growth to help separate/ screen the wetland from the busy recreational access paths crossing the meadow.

5.12 Biodiversity benefit/ net gain claimed in the Design & Access Statement document which includes the Landscape Design and Access Statement

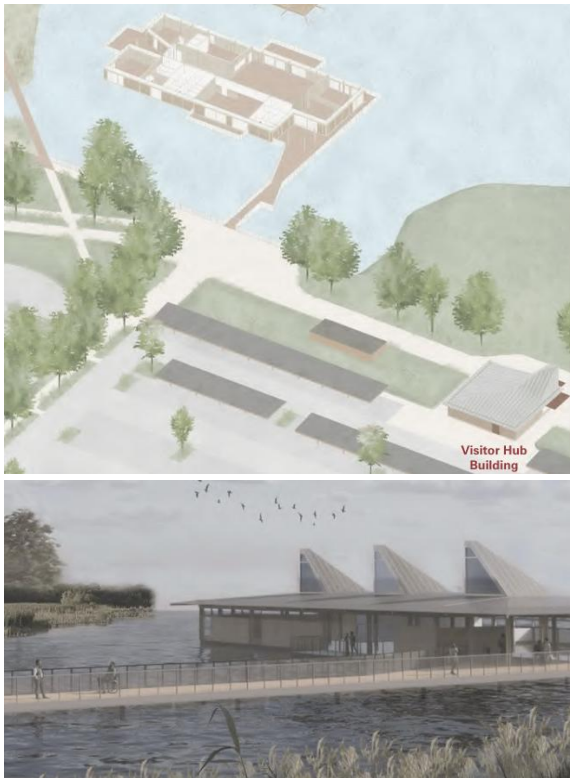
- a) Pdf page 100 suggests that the “meadow offers the opportunity to contribute 10% biodiversity net gain”. This is not the case the area where the meadow is located was already open grassland before reservoir construction commenced.
- b) Pdf page 101 suggests that “reedbed also provides compensation for the area of water covered by the Visitor Centre.” The area of the wetland lost below the building was to be high quality wetland habitat with a variety of water depths, including deep water that would only dry out during extreme drawdown events, which would be suitable for a wide variety of species. The reedbed is in a location that was already grassland prior to development, in an area of high future disturbance, where the water depth is only 100-300mm at the margins of the reservoir which will seasonally dry out. It does not compensate for the valuable wetland habitat lost below the Visitor Centre building.

5.13 Minimum water level misleading; Many of the drawings show a minimum water level of 38.8m (e.g. Visitor Centre sections HTR-UFA-VC-VC-DR-A- 031), this is not correct, water levels can drop lower during drawdown events. The reasonable worst case of the Visitor Centre pontoon sitting on mud is not made clear.

Appendix A

Design Requirements Not Met

Requirements taken from extracts of the Design Principles on pages 23 to 28 of the applicants Planning Statement. Right column highlights where requirements not met.

Accordance of the RMA with the Environmental Design Principles	
Environmental Design Requirement	Examples of where design principles have not been met
<p>Create a safe environment to work and play. Use creative and intelligent design to minimise any short and long-term health and safety issues.</p> 	<p>Work - Intelligent design has not been used in the siting of the Visitor Centre (VC) over water. There is no vehicle access to the VC. The siting maximises the need for both manual handling and double handling of;</p> <ul style="list-style-type: none"> - All supplies needed for the VC/café. - All waste to be removed from VC <p>Everything will have to be delivered to the Hub (see illustration on left), stored, and then carried or trolleyed to the VC at least 75m away, including across a 25m length of boardwalk for the whole life of the building.</p> <p>Ground Store – Is located adjacent to the kiosk in the Visitor Hub building with no vehicle access. Staff/ volunteers will have to carry tools with blades and machinery along the main public circulation route between the kiosk, picnic area and toilets presenting unnecessary health & safety risks.</p> <p>Play – The VC will act as a draw/ challenge for youths & adults in this sub-urban location in summer, wanting to jump/ dive off the floating platform or boardwalk access. It is unlikely that the drawbridge will prevent this as the water will be shallow and they already plan to get wet.</p>
<p>Maintain and integrate with the rural landscape character and woodland setting, through the design layout and material selection process.</p>  <p>Extract of Figure 2 (Planning Statement)</p>	<p>Building over water does not integrate the VC design with the rural landscape. The siting/ design does not blend in with the ancient woodland setting it makes the VC stand out and be visible from around the entire reservoir site, which is unnecessary. The 3 turrets design adds unnecessary height and visibility which the designers indicate are included to provide drama. In the Figure 2 visualisation in the Planning Statement (as well as page 5 & 40 in the Design & Access Statement) the VC looks like a cruise liner stranded in the wetland.</p>

<p>Where possible developing soft engineering solutions - limiting structures and ancillary clutter.</p>	<p>Structures and clutter have not been limited. The over water design has resulted in the need for an extra Hub building and a 25m long access boardwalk, adding to the urbanisation of the site.</p> <p>Lighting infrastructure is required over a wider area if the VC is offshore. Lighting at the VC directed down to reduce light spill will hit the water and reflect over a greater distance than if the VC were on land.</p>
<p>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 and gardens, conservation area and South Downs National Park.</p>	<p>No daytime or nighttime visual impact assessment has been provided with the application to assess the impact on views, not even from The Avenue viewpoint which is located within the historic Conservation Area (see Section 1h).</p> <p>The design does not blend in, the VC's siting offshore and design ensure that it stands out.</p>
<p>Design to minimise whole life costs such as maintenance and need for replacement ensuring durability in a challenging public setting.</p> <p><i>Note: No information has been provided on the durability of the materials to be used. Not only to weathering with time but also importantly to vandalism.</i></p> <ul style="list-style-type: none"> - Hemp cassette's to form VC walls - Rammed earth Hub & bird hide walls (site-won clay). <p>See also Appendix C4 challenge on missing information.</p> <p>and flexibility in the design to manage future requirements.</p>	<p>Siting the VC over water increases the whole life costs;</p> <ul style="list-style-type: none"> - Increased labour for deliveries increases running costs. - Makes maintenance of the building and services more difficult and expensive. - Requires a vacuum or pumped drainage system, increasing lifetime costs for operation & maintenance. - Creates a very moist environment which is likely to reduce the longevity of building materials. <p>How often will VC timber and hemp cassette walls need to be replaced compared to a brick structure? If more often, how has this been taken into account in the sustainability and carbon assessment?</p> <p>Oak shingles on VC walls are likely to be vulnerable to vandalism. Benches & picnic tables currently illustrated as wooden. In the past wooden structures in the local area have been prone to vandalism.</p> <p>A key requirement that stakeholders repeatedly made clear in workshops and consultations since 2008 was for the VC design/ layout to be flexible to allow 'future proofing'. This was also recommended as being really important by other reservoir site managers to accommodate future growth & changes in need. This design objective is <u>not</u> achieved with the over water siting of the VC,</p>

	as future extensions (or other building adjustments) would be more difficult to accommodate.
Incorporate recreational facilities that are in keeping with the quiet enjoyment of the countryside setting, optimising health and wellbeing opportunities.	Details for 'spaced play' along the main visitor routes in Havant Thicket have not been provided with this or any of the other applications. The applicant has indicated that the details will be provided with the Site Management Plan (a requirement of the s106). The public must be given the opportunity to comments on the provision for 'spaced play'.
<p>Optimise educational opportunities in all design elements.</p> <p><i>Note: The education bird hide is currently much smaller than the hybrid outline design approval anticipated/ permitted. Maximum envelope for the Bird Hide of 9m x 20m permitted. Proposed envelope for Education Bird Hide is 7.7m long by 7.7m wide PW previously committed to stakeholders that the hide would be dual use</i></p>	<p>The hide close to the VC is described as an Education Bird Hide with provision for a half class of 15 with 2 teachers. There is no reference to the hide being designed or having a dual use as a public hide. The opportunity has not been optimised for education if the public and families are prohibited from using the hide. Optimising the use would include making the hide larger and dual use, with the opportunity to shut off an area for classes/ groups when needed. It is common for education hides to be dual use.</p>
<p>Maximise opportunities for biodiversity in the design of the landscape and buildings and minimise and mitigate any conflict with wildlife through forward planning.</p> <p><i>Note: Page 10 of the Statement of Conformity with the Environmental Statement confirms for biodiversity that the Visitor Centre proposals "were not assessed in detail at the outline stage." The impact of the siting, layout and design must now be considered in detail.</i></p>	<p>A VC over water results in the direct loss of valuable wetland habitat, in an area that had a high biodiversity value providing variable depths, including deeper water, and therefore the design definitely does not maximise the opportunities for biodiversity, nor minimise the impact.</p> <p>The siting of the VC also increases disturbance across a wider area of the wetland, as does the addition of terraces and walkways on all sides.</p> <p>For more details see Section 1 and the maps in Appendix D</p>
Incorporate public art into the design in an innovative and robust way.	More use could be made of cycle stands, benches and street furniture to incorporate art in an interesting but robust way. There is a lack of detail on the provision to be made.
Optimise opportunities for a sustainable design where practical to include	
<p>Minimising material quantities as much as possible and select alternative low carbon materials in design wherever possible. Support the UK's Net Zero Carbon target by minimising where practical greenhouse</p>	<p>The application refers to using site won clay for rammed construction if possible. The contractor has been removing and working the clay for several years now, why don't they know if there if the site won clay is suitable for construction?</p>

gas emissions at all stages of the infrastructure lifecycle	The application lacks any detail on what material is proposed for the Hub and Bird Hide if the site won materials are not suitable (or not available) that by default the applicant is seeking permission for? Are the alternative materials in keeping with the rural character? If they cannot use site won clay and the sedimentary rock what impact does that have on the carbon assessment?
Design infrastructure which is resilient to expected climate change and extreme weather events	Portsmouth Water will have control over water levels in the reservoir, as a result the NW corner where the VC is located is not expected to flood. There is no flooding or climate change justification for placing the VC on a floating pontoon, as there was at Brockholes Nature Reserve.
Accordance of the RMA with the Detailed Design Principles	
Detailed Design Principles	Examples of where design principles have not been met
Visitor Centre: The visitor centre should include: A waterside terrace, with wildlife viewing facilities and space for additional visitors;	There was no requirement for the terrace to be over water. The requirement was for 'waterside'. There was no requirement for multiple terraces on different sides of the building.
Sympathetic to be provided to routes and key facilities. <i>Note: The applicant has asserted that if the VC were on land it would have to be lit at night with high security fencing, increasing its impact. I do not agree with this statement, robust intelligent design, with sensors activating lighting for CCTV recording would provide an adequate shoreline solution.</i>	Lighting infrastructure is required over a wider area if the VC is offshore, including over a longer length of path and boardwalk. Lighting at the VC directed down, as it would have to be to reduce light spill, will hit the water and reflect over a greater distance than if the VC were on land. The application refers to information provided with respect to Condition 20 but that information has not been provided for the VC.
Access for emergency vehicles.	There is no emergency vehicle access to the VC as it is offshore and accessed via a pedestrian walkway.
The design should incorporate natural security solutions.	There is no barrier shown where the retaining structure meets the NW shore. A natural secure barrier (hedge & fence) needs to be provided on the shoreline to prevent access to the retaining structure islands. A natural barrier should also extend from the slipway to the terrace to prevent children and dogs accessing the water next to the busy

	recreational hub area. This is not only a health & safety feature it will also prevent erosion of riparian vegetation. It is not realistic to expect dogs to be kept on a lead, a natural barrier such as managed hedge incorporating a stockmesh fence is vital.
Public Art: A wide interpretation of public art should include use of features such as benches, walls and signposts. An integrated approach of public art with street furniture will be explored for items such as benches, cycle racks and bins.	There is little evidence to indicate that public art is being incorporated into street furniture.
Public art should be used in part to celebrate and enhance the natural and cultural history of the area, including references to heritage features impacted by the Scheme, such as the Avenue.	There is little evidence to indicate that public art is being used in this way. More use could be made of cycle stands, benches and street furniture to incorporate art in an interesting but robust way.
Play Space: Spaced play to combine nature-themed playground equipment with trails and greenways will create a playful trail experience for children and families. Spaced play to be included along the shorter 2km pedestrian route through the woodland north of the visitor centre.	The applicant has indicated that this will be developed as part of the later Site Management Plan (SMP) on a site-wide level. The Plan is a requirement of the s106. The public must be given the opportunity by the LPA to comment on the SMP before it is approved, including on the applicants proposal for spaced play.
Consideration of the play area location (currently in proximity to the bin store, a more suitable location should be explored);	The main play areas have been sensibly located in the south of the NW corner away from the ancient woodland, wetland, and closer to the community at Warren Park. The main play areas are screened by soil banks. While this is useful in some respects to screen the noisy activity from the wetland it does raise some other concerns; <ul style="list-style-type: none"> - There is limited seating inside the banks to allow parents to supervise their children. The grassy banks will be too wet to sit on for much of the year. - What thought has been given to how these areas will be used out of hour? - Is there a risk that youths will gather in an area obscured from the view of the main paths? - How durable is the play equipment to vandalism and anti-social behaviour?
Grounds Maintenance Workshop & Store to be provided.	A Grounds Maintenance Workshop & Store has not been provided in the Reserved Matters design for the Control House Building.

<p><i>Note: On the approved hybrid application outline design this was shown as located within the Control House Building.</i></p>	<p>Nor is adequate provision made in the NW area. Only a 'Grounds Store' is shown in the layout for Hub Building in the 2026 NW layout, but that is not of sufficient size to be fit for purpose (see Appendix F)</p>
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Concerns re - 'Out of Hours Use' Mentioned in Design and Access Statement

Page no. (Pdf)	Text referring to 'Out of Hours Use' in the Design & Access Statement
32	The close adjacency of the education and café / restaurant spaces, with a sliding-folding screen between, means that out of hours the education space can be blended into the café space to make a much larger restaurant venue . The café/ restaurant is served by a large kitchen, which is extensively on show to allow a fine dining experience style with visible cooking activities. are expressly designed to allow table service, an evening bar serving area and fine dining opportunities.
34	Layout 3 title - café out of hours , uses education space, but shop closes. Note; Shading shows external terraces and walkway in use out of hours
36	Picture title - Education space used by restaurant out of hours
107	Re lighting; <ul style="list-style-type: none"> - refers to maximising round the clock use¹ - refers to car park & visitor centre will be the core areas of lighting <p><i>Note 1; There is a conflict of interest in the objective of maximising round the clock use of the site, as the aim of the design should be to reduce the use of the site at night (including at dawn and dusk) for recreational use in order to minimise the ecological impact, as these are critical times for wildlife activity at the site. That was the outline hybrid reservoir design objective in line with the reservoir being an environmentally led project. That is why the original EIA for the hybrid application did not consider after dark use of the facilities/ access.</i></p>

Concerns:

No information on the proposed hours or frequency of use is provided with the application, but it is clear from the information in the Design & Access Statement summarised above that use of the Visitor Centre is planned out of hours, including evening use.

No information on the hours of use for the car parks. At Staunton Country Park the car parks are not accessible in the evenings, the barriers ensure there is no access to the car parks when the park facilities close.

There is no assessment of the impacts of nighttime use in the Statement of Conformity with the Environmental Statement submitted with the application.

Original hybrid planning application assumed no nighttime use to ensure no impact on the important night time ecology which includes rare protected bat species, badgers, nightjar, woodcock and glow worms. **Any use after dark is a materials change that requires an environmental and ecological impact assessment.**

Therefore, there has been **no environmental impact assessment for the nighttime (after dark) use** of the Visitor Centre, external terraces and walkways, access roads (including through ancient woodland) and lit car parks located adjacent to ancient woodland.

- No ecological impact assessment
- No lighting impact assessment
- No visual impact assessment

For example, lighting in the carpark may discourage bats from crossing the narrow pinch point in the commuting corridor between the Havant Thicket and Bells Copse woodland blocks.

Condition 18 of the original hybrid application consent required; “The barriers should also be provided at the northern and southern entrances and **locked at night time to prevent anti-social behaviour.**” It was clearly the intent that the reservoir site would not be accessible to vehicles or used after dark.

If the Visitor Centre were to be used in the evenings, then the entrance barriers to the access roads would have to remain open after dark and this would significantly increase the risk of anti-social behaviour and off road motorcycle use at the reservoir site.

If the LPA are minded to approve the current application, then conditions should be applied to any consent granted as follows.

- An hours of use condition to ensure that the Visitor Centre and Hub Building cannot to be used after dark.
 - *Reason: To protect the night time ecology. Noting that there has been no Environmental Impact Assessment for use after dark.*
- A requirement for the southern and northern car park vehicle barriers to be closed and locked after dark prohibiting the use of the car parks at night.
 - *Reason: To protect the night time ecology, remove the need for lighting after dark and reduce the risk of anti-social behaviour. The permission could allow for up to 12 evening (or dawn) events for a maximum of 20 people to take part in guided educational walks. For example, guided walks to search for bats, nightjar, glow worms or moths.*

Note: The HBC Planning Committee has already determined to require that a planning condition should be applied to the Southern Access Road permission to prevent use after dark to protect the nighttime ecology.

Appendix C

Missing, incomplete or inadequate information with respect to the Phase 9 NW corner application

The following information is missing, incomplete or inadequate in relation to application APP/26/00574 and should be provided before the application is determined as it is material to the decision to be taken by the LPA.

C1 Information to confirm the proposed hours of use of the facilities and car parks.

C2 A detailed environmental impact assessment is needed for the Visitor Centre and NW corner area, as this was not completed at the outline planning approval stage. This should include;

- After dark use of the access road, carpark & facilities if that is proposed.
- An alternatives assessment for impact of siting the Visitor Centre on shore or as an island.
- Scientifically based objective evidence that the Visitor Centre building location minimises disturbance to flora & fauna. Indicated to be provided with the Reserved Matters submission on page 15 of the Design & Access Statement, but that has not yet been submitted to the LPA/ made available.

Note 1: if this is the same evidence previously submitted to reservoir stakeholders it does not provide robust scientifically objective evidence. It is based on an open estuary study where there are extensive mudflats (the River Severn) which is not comparable to the retained wetland water body where the birds have the permanent safety of the water. Birds behave very differently to disturbance in an open estuary tidal environment where the safety of open water is much further away.

Note 2: The Middlemarch - Ecological Mitigation Compensation and Enhancement Measures: Visitor Facilities Phase (HTR-MME-VC-VC-RP-X-0001, July 2026) submitted in association with the application to discharge Condition 36 for Phase 9 does not fully assess the ecological impact of regular nighttime use of the access road, car parks, nor visitor facilities (such as the Visitor Centre) on bats or badgers. Impacts are likely to include increased disturbance, road casualties and lighting impacts, including on the narrow wildlife corridor between the ancient woodland blocks of Havant Thicket and Bells Copse. Page 21 refers to; “While occasional night-time use of the Visitor Centre is proposed, it is not anticipated that regular night-time illumination of the Visitor Centre will be required.” This is contrary to information elsewhere in the application referring to the evening use of the Visitor Centre as a restaurant (see Appendix B). If evening use is planned that is a material change and its impact must be assessed before consent is granted, or a planning condition applied that prevents use of the facilities and car parks after dark.

C3 Not yet clear that the planned Rammed Earth construction with sedimentary blocks at ground level for the Hub Building and Bird Hide is feasible using site won materials. No information is presented on the materials to be used if a Rammed Earth

construction using site won clay is not possible. As a result, it is not possible to assess the visual impact of the alternative back-up design as none is provided.

C4 Durability of materials in a challenging suburban public setting?

A key concern of stakeholders has been to ensure that the facilities provided are durable in the challenging sub-urban setting where there has been a history of vandalism and antisocial behaviour. As a result, a key design requirement is to ‘Design to minimise whole life costs such as maintenance and need for replacement **ensuring durability in a challenging public setting**’.

A number of novel approaches in material choices are planned in the design to improve sustainability and reduce carbon, but no information has been provided to demonstrate their longevity and durability, especially against vandalism. Information should be provided by the applicant to demonstrate that the materials selected will be durable in the challenging sub-urban public setting including for;

- Hemp cassette’s to form VC walls? (including in the damp over water location)
- Oak shingles on external walls of the VC?
- VC windows to be softwood with anti-bird strike glass? (no shutters proposed to protect the windows at night, they are only to be provided on the Hub building kiosk openings)
- Balustrade fencing to VC access walkway and external terraces to be glazed toughened glass?
- Rammed earth Hub Building and Bird Hide walls?
- Ancillary building furniture (e.g. downpipes where external)
- Glu laminated timber for car ports?
- Street furniture? (showing timber benches and picnic tables)

C5 A number of important stakeholder engagement documents are missing.

Stakeholder Engagement Tracker - Indicated to be provided with the Reserved Matters submission on page 59 of the Design & Access Statement, but it has not yet been provided.

The Statement of Community Involvement for the Visitor Centre submitted with the application refers to important appendices on page 3 that should be with the document but are missing from the version on the planning portal;

- Appendix A – Record of feedback from engagement with stakeholders, Under 18’s and the general public
- Appendix B – HTR Visitor Centre May 2026 customer research report

No substantive information has been provided by the applicant to support the claim that there was widespread support for the siting of the Visitor Centre as an island with the wetland conservation area.

Note: The Statement of Community Involvement does not reflect my own experience at stakeholder workshops, underplays the legitimate concerns made by stakeholders, and does not cover all of the concerns raised, so it is important that the missing documents are made available to substantiate claims made by the applicant, and so that the wider public, officers and councillors can see the wide range of concerns raised by stakeholders with respect to the Visitor Centre siting and design.

*I will attach to my response the 'Stakeholder Feedback Tracker V02_Jan 2026' a spreadsheet provided by Portsmouth Water to Stakeholders recording their feedback and subsequent actions in response. You will see that **the majority of respondents made it clear that they did not support the island location of the Visitor Centre.***

This was not a beauty contest, where the most popular location wins. The reservoir is claimed by Portsmouth Water to be an environmentally led project, so the Visitor Centre should be located where it will cause least environmental impact, especially on biodiversity, in line with ecological mitigation hierarchy to avoid the unnecessary additional disturbance.

I do not agree that a Visitor Centre located on land would have to be surrounded by security fencing and lit at night. I cannot think of any of the hundreds of visitor centres that I have visited that have this, not even in urban fringe locations. Instead, they use intelligent design of the building and robust materials to reduce the risk of vandalism. The assertion by the applicant's consultant about the need for security fencing & lighting has not been substantiated.

C6 Other documents referred to in the Design & Access Statement which have not been provided with the application include;

- a) Access & Recreation Implementation Management Plan, Jan 2025 (pdf page 73)
- b) Timberplay Document (pdf page 82)
- c) Havant Thicket Landscape Ecology & Conservation Plan (referred to on pdf pages 96 & 99)

C7 A Play Phasing Strategy has not been provided. Information on pdf page 94 of the Design & Access Statement indicates the installation of play equipment will be phased. However, there are no details other than the drawing for one small area on which play equipment will be installed initially at the time of opening the NW area to the public and what will follow later?

Details of the phasing, programme and triggers should be provided before the applications is determined, or this should be controlled by a condition to ensure a good level of provision is available when the NW area opens to the public, and that all play equipment is provided within 3 years.

C8 Lighting zones – Page 107 of the Design & Access Statement pdf refers to lighting zones being used as a tool to ensure visitors feel safe at the site during early mornings and evenings. The lighting map on page 107 does not appear to cover the Visitor Centre area which is part of the application under consideration. Nor is it included with the information submitted by the applicant in September 2026 in relating to discharge of the lighting condition.

Given that any lighting is key to determining the environmental and ecological impact of the NW corner siting and layout the lighting principles should not be left to be dealt with by condition. Clear information on what areas and facilities the applicant plans to be lit and in what form should be provided as part of the current application. Only the final detail should be dealt with by condition.

C9 Lack of information on fencing, barriers and hedging

- a) No information is provided on what fencing/ barriers will be in place to stop dogs accessing the play areas? The landscape mounds with multiple entrances will not prevent dog access, a key requirement for a children's play area. Design & Access Statement document pdf page 84 shows no gates or fences that would prohibit dog access.
- b) No information to show that a managed hedge incorporating a fence will be provided along the waters edge between the slipway and terrace to prevent access (people & dogs) to the water and damage to riparian vegetation along the shoreline adjacent to this recreational hub.

Note: At Arlington reservoir where there is open space and picnic tables between the car park and the reservoir shore riparian vegetation would not establish or was repeatedly eroded due to people & dog access until South East Water provided a managed hedge incorporating a fence along the shoreline (see photo in Section 5.2).

- c) No information provided to show a physical barrier (fence & hedge) to prevent access (dog and people) to the wetland island retaining structures, especially during drawdown when the spillway that would normally discourage access is dry? (further detail in Section 5.2)
- d) While drawings are provided to illustrate the construction details for fences, barriers and hedges (Typical Landscape Detail 1 of 3 Drg. HTR-FIR-XX-ZZ-DE-L-4005-PO2) there is no general arrangements plan(s) that shows where each detail will be used.

As a result, is not possible to establish what would prevent dog access to sensitive areas such as the wetland, the Viewing Platform on the water's edge, or the play areas.

C10 There is no visual impact assessment with photomontages etc., not even for the views from The Avenue viewpoint (which is within the boundary of the Grade II listed Park & Gardens). A visual impact assessment should be provided for key vantage points around the reservoir site.

- No visual impact/ photomontages from key vantage points, including The Avenue viewpoint (Grade II listed Park & Garden), western embankment, and bird hide locations.
- No visual impact when the reservoir is drawn down and the visitor centre sits on mud, no longer floating. The minimum water levels shown on the application

drawings are not representative of a reasonable worst-case scenario with the reservoir drawn down.

- No nighttime visual impact assessment, with no photomontages to show what the Visitor Centre will look like when lit up at night, including from the SCP Terrace, the Avenue viewpoint, or residential properties.

The visual impact assessment should consider all 3 new buildings and ancillary structures which form part of the application, including the Bird Hide and Hub.

The design of the buildings with its turrets (especially the 3 on the roof of the VC) will make them stand out. It is a requirement that the “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 and gardens”. An visual impact assessment should be provided so that the impacts can be evaluated before consent is granted.

C11 A slipway forms part of the development description and a symbol is shown on some of the drawings south of the play areas. No detail is provided for the exact location or design of the slipway. There appears to be no vehicle access shown to the slipway on the Landscape Masterplan. Detail of the design and proposed use of the slipway should be provided. For example, is it only for operational use by Portsmouth Water?

C12 There is no general arrangements drawing to show how the paths from the NW corner area will connect to the paths associated with the Southern Access Road. This was queried for the Southern Access Road application and it was indicated that the detail would be included with the later phase details. This is the last phase and the detail showing connectivity of multi-user paths, cycle routes and barriers/ bollards to slow movement where paths merge should be provided as a part of this application.

C13 No details have been provided of how motorcycles will be prevented from accessing the site at new horse, cycle and pedestrian entrances to the NW area. Condition 18 of the original hybrid planning consent required; “details of measures to deter motorcyclist access shall be submitted to and agreed in writing by the Local Planning Authority.” The reason given was “In the interests of highway safety, visitor amenity and safety and protection of new and existing habitats.”

C14 The application letter states that separate applications have been made for the Visitor Centre in relation to discharge of Conditions, but no detail has been provided for the following conditions;

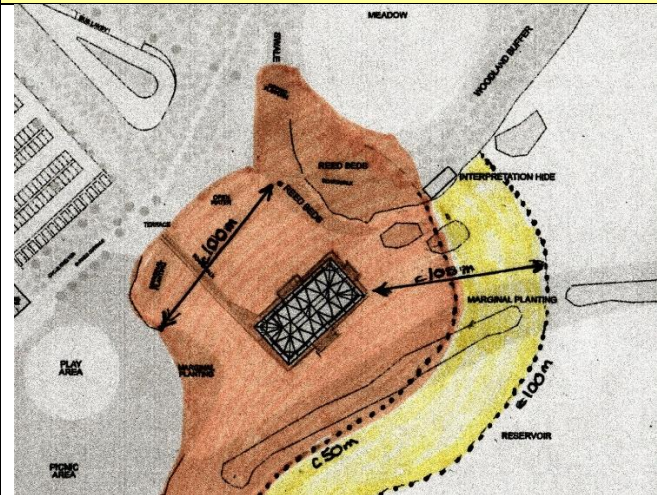
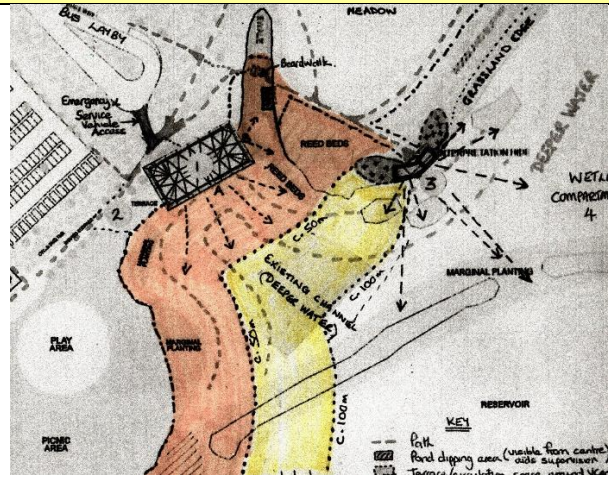
- Condition 20: Lighting for the Visitor Centre & boardwalk access
- Condition 34: Foul & surface water drainage

Given the planned location of the Visitor Centre over water the LPA should seek this information before determining the application for the NW corner of the reservoir site, as after dark use and lighting of the Visitor Centre is material to the impact assessment.

Note 1: There was a very late submission of details for the Condition 20 (Lighting of the car park & hub area only) and Condition 36 (Ecological mitigation). Comments on these details will be provided separately.

Appendix D

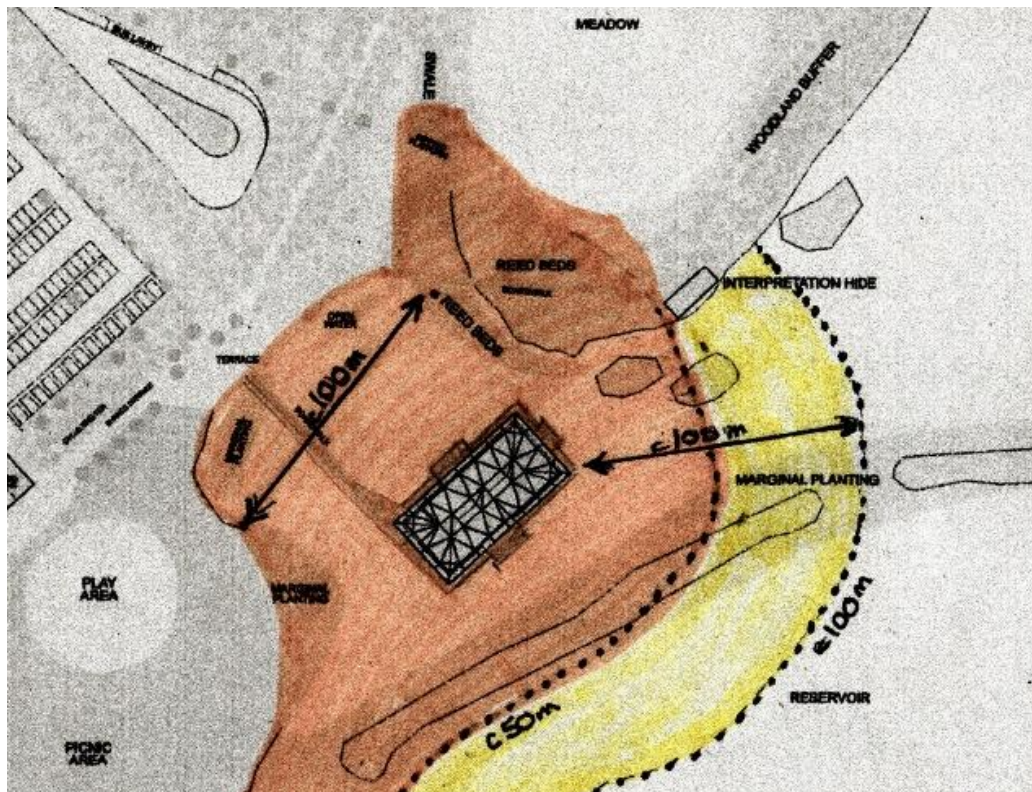
Summary of the impact of alternative siting of the Visitor Centre as an island or in a shoreline location, including an assessment of the anticipated Disturbance Zones

Island Visitor Centre (with external terraces)	Shoreline Visitor Centre (no front terrace)
Orange – High risk disturbance zone; area disturbed the majority of the time due to proximity to the play area, picnic area & Visitor Centre / terraces. Likely to see species that tolerate disturbance and can become habituated including; coot, mallard, mute swan, Canada goose, black headed gull & herring gull.	
Yellow – Moderate risk disturbance zone; disturbance more intermittent if very loud or sudden noise, or uncommon activity occurs. The good range of water depths and mix of riparian/ island habitats and open water should enable a greater range of species to feed and roost most of the time including; grey heron, little egret, great crested grebe, little grebe, <i>teal</i> , gadwall, <i>shoveler</i> , <i>wigeon</i> , tufted duck, <i>terns</i> , <i>redshank</i> , <i>black-tailed godwit</i> , <i>ringed plover</i> & kingfisher, as well as snipe and Mediterranean gull which previously used the reservoir site. (Species in <i>italic text</i> are qualifying species for nearby Langstone & Chichester Harbour SPA)	
	
Island location means high disturbance zone (orange) extends much FURTHER OUT into the wetland & reservoir.	Zone of high disturbance (orange) does NOT extend out as far into the wetland/ reservoir.
Reduced species diversity close to shore and VC (see orange box above), giving less for visitors to see. They would need a telescope to view more interesting species.	Greater species diversity likely to be present closer to shore and VC, increasing viewing experience/ opportunities for visitor engagement and education.
VC takes up valuable wetland habitat space which is completely unnecessary.	VC does not take up valuable wetland habitat, optimising the area of wetland habitat available.
Zone of maximum disturbance extends up to the education hide. The yellow zone of moderate disturbance extends in front of and beyond the Education Hide which will impact what can be seen. This can be avoided with careful siting of the VC to optimise the viewing opportunities from the education Hide.	Zone of maximum disturbance does NOT reach the Education Hide. The yellow zone of moderate disturbance only marginally impacts a small part of the view looking west from the Education Hide, ensuring great viewing opportunities & a broader range of species are more likely to be seen.
VC has excellent views out over the wetland and reservoir giving the 'wow' factor, the long access boardwalk, terrace on each frontage	VC on shore has excellent views south across wetland/ reservoir and to the east over swale channel and reedbed, still giving

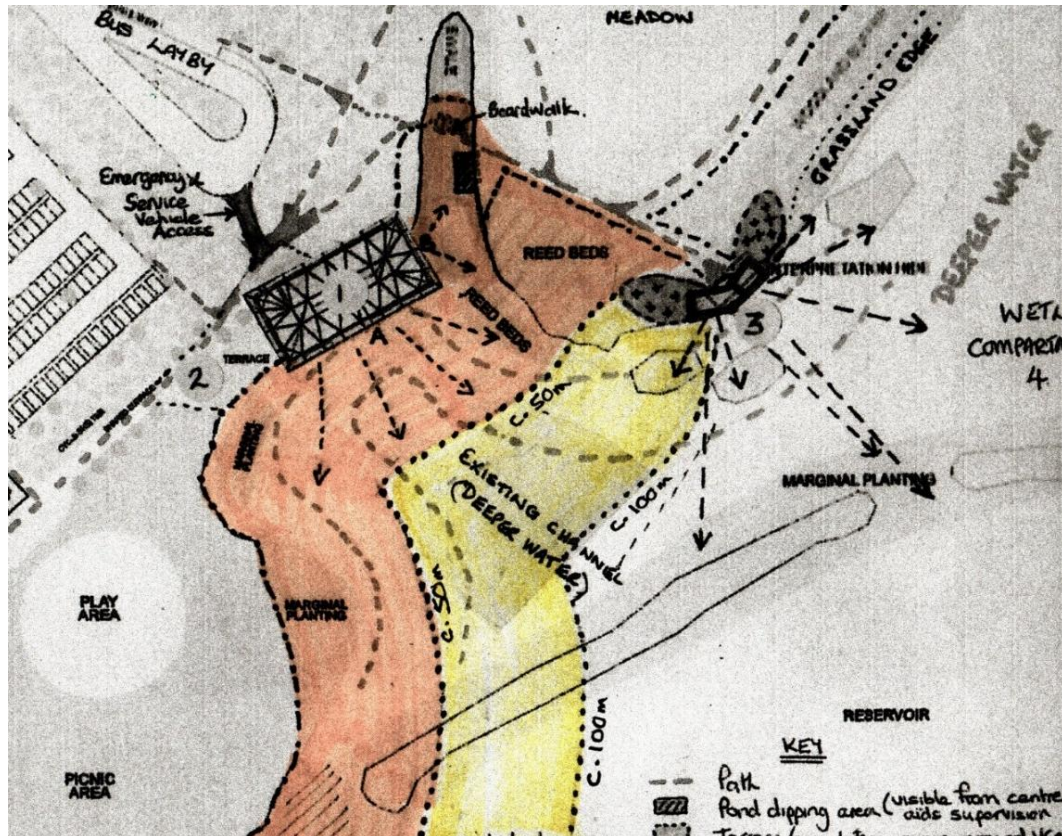
ensures the wetland habitat is disturbed so species available to view would be extremely limited (wasted opportunity)	a great 'wow' visitor experience. Space at rear taken up by toilet, kitchen & offices so does NOT need great views.
Long boardwalk (c.25m) over water for access to the visitor centre maximises disturbance to the wetland as noise of people & silhouettes breaking the skyline is guaranteed to scare off wildlife. Noise of trolley wheels carrying supplies & wheelchairs over boards (hit & miss noise) will add to the disturbance.	Excellent screened access from carpark minimises disturbance from visitors arriving, providing simple ALL ability short access to VC. Great connectivity between VC & terrace. Trolleys carrying supplies enter from rear causing no disturbance to wetland.
VC sits on top of existing valley which would have flooded to provide deeper water habitat.	Existing valley feature (see contours on map above) when flooded will provide a variety of submerged vegetation and deeper water which diving species such as tufted duck and great crested grebe could use & still be visible from the shore & VC.
The majority of the retaining structure island south of the visitor centre will be within the disturbance zones, with 80% expected to be within the high risk disturbance zone (orange), reducing the biodiversity value of the island habitat, especially for birds.	Less than 50% of the retaining structure island south of the visitor centre will be within the disturbance zones, with just 15% within the high risk disturbance zone, protecting the habitats on the island from significant and regular disturbance.
New reedbed enhancement north of VC shown on an area which was formerly dry neutral to acid grassland which is <u>not</u> likely to form a wet reedbed habitat and will <u>not</u> stop visitor/dog access to the shore. Limited wildlife value does not compensate for the loss of c.1269m ² (27m x 45m) of high quality wetland habitat taken up by the island location of the VC.	Swale and new reedbed enhancement will add interest to the view from the east end of VC, but access routes from VC to Interpretation Hide mean it will be within the high disturbance zone anyway, so any disturbance from the VC will make no difference.
Limited opportunity for intelligent design of the building to reduce disturbance as visitors, including children and dogs will be present causing disturbance outside the structure.	Intelligent design in location and layout can minimise impact on wetland. For example, sealed windows on south & east facades, vents can be directed away from wetland, building can help screen noise from the terrace, fencing & low hedging along shore can facilitate great views but stop dogs/ children disturbing the wetland shore.
Very exposed location of VC/ café and SW prevailing wind will make it impossible to stop litter blowing into the wetland (paper cups, napkins, drinks cans, wrappings & stirrers)	VC location sheltered by trees/ landscaping reducing the wind and risk of litter being blown into the wetland. Litter blown off tables can be captured on fence/low hedge around terrace on shore.

Note 1: Maps consider disturbance to the wetland/ reservoir area based on experience of visiting hundreds of similar sites. Zone s peer reviewed and agreed by Richard Levett (retired wetland specialist with more than 30 years' experience of managing/ monitoring wetlands).

Map 1 - Island Location - Visitor Centre as an island



Map 2 - Shoreline Location - alternative siting would reduce disturbance of wildlife and impact on the wetland (located within permitted VC area box in outline hybrid permission)



Note 2: In both location scenarios it is assumed the Education/ Interpretation Hide is screened on both sides to minimise disturbance in front of the hide.

Appendix E

Examples of Multi Purpose Dual Use Bird/ Education Hides

Blashford Lakes, Hampshire – New Tern Bird/ Education Hide – overlooking gravel pit



Wooden construction with steel structure, approach is screened. Bird silhouettes add interest.



Right end - Shaped frontage provides some variation in viewing angle, with lower window and shelf in disabled viewing position. Good circulation space for groups and tripods.



Left end - One-way larger glass windows this end of Tern Hide is designed to be good for education but is also available for use by the general public use. **This end of the hide can be separated off from the remainder of bird hide using a built-in fold out partition and used for education or guided group visits, with a separate entrance door provided for when the hide partition is in place, then the remainder of the hide can remain open to the public (i.e. it functions as a dual use hide).**

Leighton Moss RSPB Reserve, Morecombe Bay, Lilian Hide – multi-purpose hide



Excellent dual-purpose hide with central open viewing area ideal for education, groups and members of the public to enjoy the view. One way glass and windows sealed to reduce noise disturbance. There is an electricity supply to allow use of a remote-controlled camera and TV screens to aid education/ learning.

Wings on both sides provide a more traditional hide layout with windows having smaller openings on either side for birdwatching, but still with deeper circulation space behind benches to make it suitable for education and mobility access as well.



Note: Hide has to be closed to the public during education visits as no sliding partition to separate areas, nor a separate entrance door.

Pensthorpe education hide (Norfolk), with deeper interior and more circulation/ standing space behind the seats which is essential in an education hide



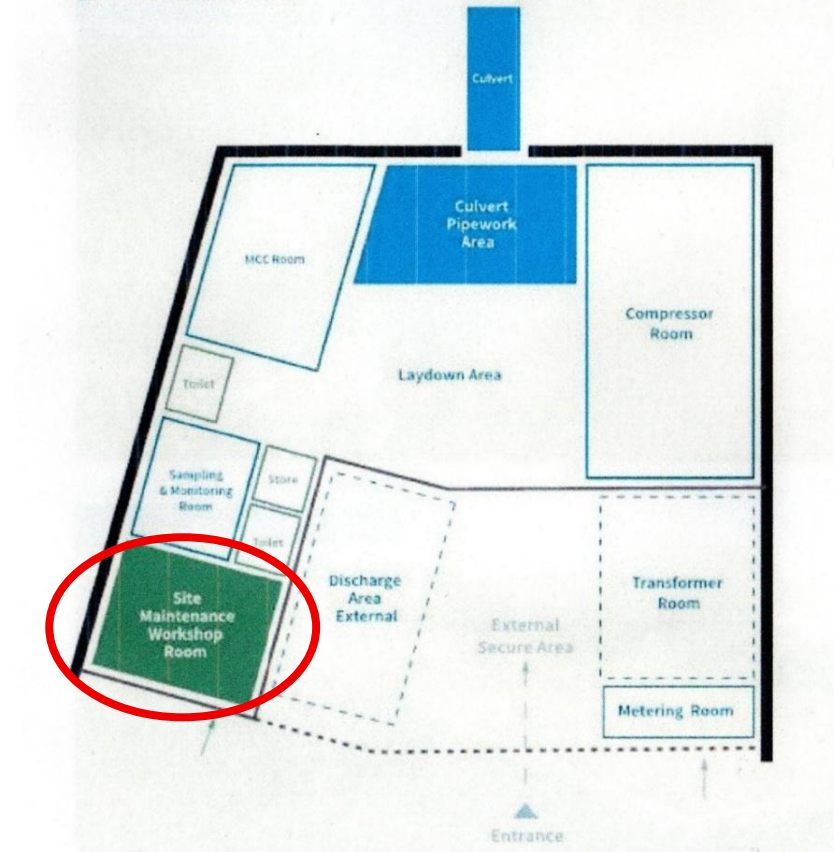
Appendix F

Inadequate allocation of space for Grounds Maintenance Storage & Workshop in 2026 planning application

2020 Planning Application Indicative Layout

Control House including Site Maintenance Workshop Room

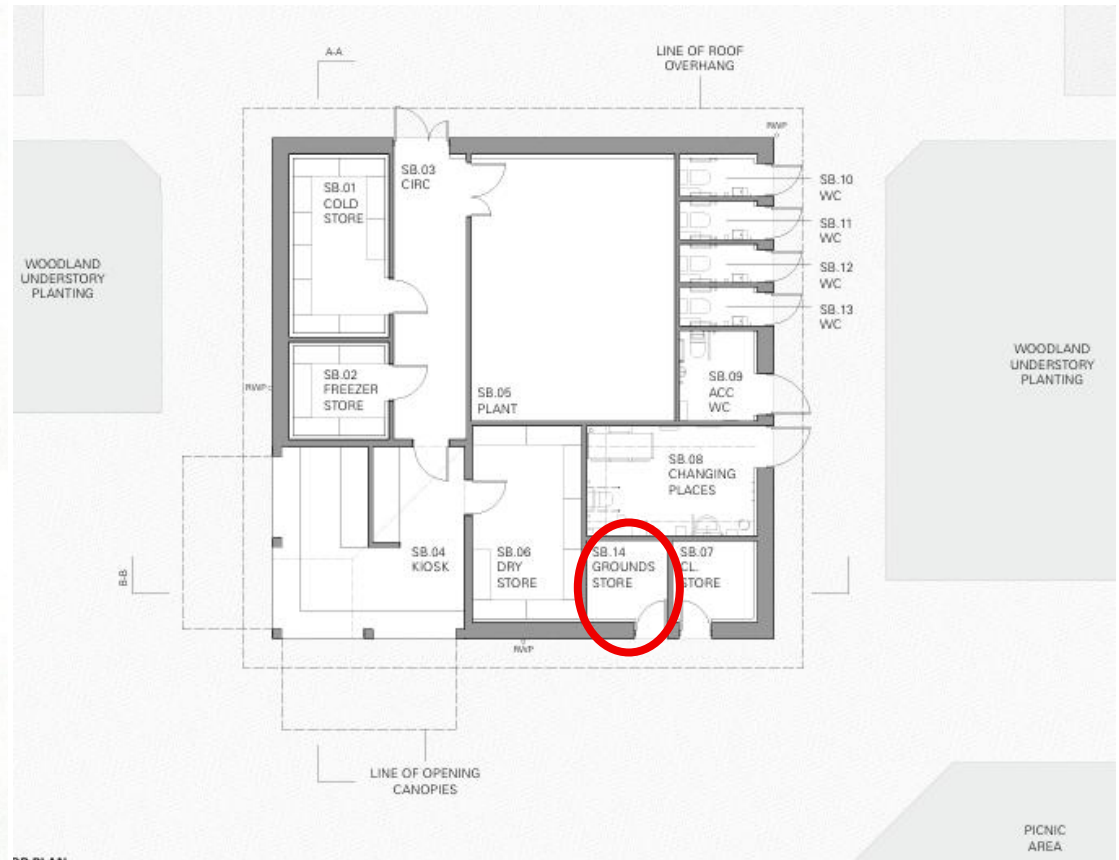
Figure 6.4: Indicative Layout



Source: 2020 Application – Extract from Design & Access Statement

2026 Planning Application Layout - Visitor Hub Building

includes only a very small Grounds Store (no workshop space)



Source: July 2026 Application – Extract from Visitor Hub drawing

The 'Grounds Store' shown within the 2026 Visitor Centre Hub building should have been designed to replace the Grounds Maintenance Store & Workshop area removed from the Control House building layout but it is much smaller and not fit for purpose.

- The new store is about the size of 2 toilet cubicles, more of a walk-in cupboard than a store and workshop.
- There is not adequate floor space to accommodate larger equipment such as mowers.
- There is not adequate internal space provided to enable the area to function safely as a workshop, with a workbench where staff and volunteers can maintain machinery, bird & bat boxes etc
- There is not enough space to accommodate the large variety of grounds maintenance equipment that will be needed such as strimmer's, chainsaws, hand tools for volunteers (saws, spades etc.), nor the safety equipment and safety signage needed.
- The store does not appear to be suitable for the storage of petrol and oil that will be needed to run machinery.
- There is no direct vehicle access for loading/ unloading machinery and equipment.

If things like sit on mowers are not to be accommodated at the Hub Building where are they to be accommodated and maintained?

There will not be space in the Visitor Hub plant room as this is to be used as an energy centre and plant room serving the needs of the Visitor Centre and Hub Building.

The LPA made it clear at the time of the Reserved Matters application for the Control House Building that as the Grounds Maintenance Store & Workshop had been removed from the design layout it would have to be re-provided elsewhere on site. The only other sensible place it can be re-located to is in the NW corner of the reservoir site.

If space is not provided for a suitably sized ground maintenance store and workshop, then it is highly likely that a large metal container will have to be located on site to meet this obvious need as soon as the site opens. A metal container would be very unsightly and vulnerable to theft of equipment, as the security system for the Visitor Hub (CCTV etc) would not protect it.

The access to the 'Grounds Store' is currently shown on the south-east side of the Visitor Hub, furthest away from the car park/ vehicle access, where families and the elderly will be circulating between the kiosk, picnic area/ play area and toilets, or queuing for the kiosk. As a result, staff and volunteers will have to take machinery or carry tools and equipment through that main pedestrian circulation area which presents unnecessary health and safety risks that could and should have been designed out by placing the store in a location where there is direct

vehicle access. Intelligent design to minimise risks to the public and reduce manual handling of machinery and equipment is a fundamental requirement.

If the LPA is minded to approve the current application for the NW corner of the reservoir, then a planning condition should be applied requiring provision of a larger Grounds Maintenance Store & Workshop at least equivalent in area to that originally shown in the hybrid outline application/ permission within the Control House building, with the layout ensuring direct vehicle access.

If the current NW reservoir site layout is to be approved the entrance to the store should be on the car park side of the Hub Building to enable easy and safe access and egress with tools and machinery for staff and volunteers to load a vehicle as close as practical to the store. As was previously provided in the original Control House location.



Example of a ground's maintenance store/ workshop at Rutland Water (Anglian Water) with level access and roller shutter doors

