Rowlands Castle Parish Council

Dominic Harland-Jones
Clerk

11 The Green
Rowlands Castle
Hampshire PO9 6BW
Tel: 02392 413044
Email:
clerk@rowlandscastleparishcouncil.gov.uk
Website: www.rowlandscastlepc.org.uk

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Narinder Lakhan
Principal Planning Officer
Planning Services
Havant Borough Council
Public Service Plaza
Civic Centre Road
Havant
Hampshire PO9 2AX

Email: Narinder.Lakhan@havant.gov.uk
Planning.development@havant.gov.uk

Reference: Planning Application APP/26/00574
Application for approval of all Reserved Matters (siting, scale, external appearance, and landscaping) **relating to Phase 9 (North West Corner and Visitor Centre) of the Havant Thicket Reservoir development** pursuant to Condition 2 of the S73 consent planning reference APP/24/00312 dated 6th December 2024.

Dear Narinder,

Firstly, it was concerning that Rowlands Castle Parish Council had no notification of this Planning Application directly as we only heard about it through a 3rd party. As the Visitor Centre (VC) and its locality are contiguous with our parish and East Hants District and part of the overall Havant Thicket Reservoir Project we would have expected to receive such a notification.

Rowlands Castle Parish Council (RCPC or 'the Council') objects to the above application as submitted on the following grounds:

a. The siting of the VC to float within wetland compartment 4.
b. The provision of external terraces/ walkways, especially on the south-east and north-east wetland side of the VC building.
c. The size of the educational bird hide and failure to optimize the layout and design to make this a multi-user space for the benefit of families, the elderly and disabled users, with the lack of internal circulation space in the viewing area resulting in the hide not being fit for purpose.
d. 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.
e. Not complying with multiple reserved matters design criteria set out in the hybrid outline design permission.
f. The material change to the proposal for 'Out of Hours Use' of the facilities and the resultant requirement for lighting around the NW area.
g. Missing, incomplete or inadequate information that should be provided before the application is determined as it is material to the decision.

The hours of use of the buildings and the car park have not been specified by the applicant but it is clear from the information in the Design and Access Statement (Page 32) that evening use of the VC 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. The proposal to open the VC after dark is absolutely material to considering its siting, layout and design, especially in terms of the need to reduce the impact on biodiversity and the night-time 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. No suggestion of doing this has been make to stakeholders to date and this is an attempt on the quiet to increase the variety of use of the VC beyond what has been discussed in public so far.

The outline design for the original hybrid planning application assumed no evening use of the Visitor Centre to minimize 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 VC. This requires detailed consideration of the traffic impact, landscape and visual impact across the reservoir, biodiversity impacts including on ancient woodland, 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 minimize the impact on ecology and that has not happened. The island location selected for the VC will considerably increase adverse ecological and visual impacts and should be rejected.

It is RCPC's view that night time use of the VC goes against all the previous discussions between Portsmouth Water and stakeholders and invalidates their statement that the HTR is an environmentally-led project. The absence of light in the countryside is critical to the survival of many species that require the dark and the presence of lighting both fixed on buildings and around the NW area generally, plus the headlights of traffic on the access roads is not acceptable. The Council notes the application to discharge Condition 20 (Lighting Strategy) through the use of low-impact lighting but artificial light will still have a negative impact on an area containing wildlife that previously had no such lighting at night except during the temporary construction period.

The Statement of Community Involvement page 4 states that "Some concern was raised by a small number of stakeholders over how much the VC will be used during the hours of darkness". The number was NOT small, many of us expressed strong concern about the VC being used during the hours of darkness because we had understood previously that such use was not intended by Portsmouth Water and they have now gone back on their word. RCPC notes that the Appendices that contain the detailed records of the feedback have not been supplied to date, which indicates a desire to hid information relating to stakeholder engagement. The applicant needs to reconsider this very significant material change to use of the site if they are not to be seen to ignore their own assertions and statements on the reservoir being an environmentally-led project. The Council remains firmly opposed to use of the VC during the hours of darkness.

Specific Comments and concerns

VC location.

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 VC should have been provided with the application. The location of the VC being off-shore in the western wetland area with its external terrace/walkways, especially on the wetland side of the building, will result in considerable disturbance to the birds using that part of the wetland and means that only birds habituated to the presence of humans are likely to be seen close to the Centre. The offshore location results in the loss of valuable wetland habitat below and in the vicinity of the footprint of the Visitor Centre building and extends the zone of disturbance much further out into the wetland than is necessary It appears that the delivery of a floating VC was considered on the basis of security and visitor enjoyment rather than taking into

account the adverse impact on the wildlife for which the wetland has been formed. However, anti-social behaviour will not be eliminated by an offshore design, which 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 If security requirements are to be the key driver requiring the siting of the VC over water in the wetland compartment 4 then, at the very least, the external veranda on the south-east side of the VC should be removed, thus reducing the impact of humans on that section of the wetland. As designed and located we consider it to be overly impactful with a negative effect on the wildlife.

A key design criterion was to make the VC 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'. As such it is at odds with the rural woodland landscape and will stand out in views from around the reservoir site, yet the applicant has not provided a visual impact assessment. There should be an independent visual impact assessment of the VC and the Bird Hide and also the Hub.

There is no direct vehicle access to the VC for any requirement so that all types of supplies, waste produced and emergency removal of anyone taken ill has to done over the long walkway. There is also no opportunity for future proofing whereas a land-based solution could be expanded if required by visitor demand.

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 and visual impact for this element of the design as there was no detailed design for the VC and the location had not been fixed, making assessment impractical. Nor was the traffic impact along the Access Roads or lighting effect at night assessed as it was assumed the VC 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 it should include a meaningful and robust assessment of the advantages and disadvantages of siting the VC on the shoreline compared to an over water location.

Provision of external terraces and walkways at the VC

Excellent views will be available from within the VC with large windows providing the 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 and certainly not on the south-east long side overlooking the wetland, where the widest terrace is shown. Actually, 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. Having people outside will increase disturbance to wildlife and keep most birds further away except those habituated to humans who see them as a source of food! Any lighting on the terraces will adversely impact the environment as it will reflect upwards from the water. The terraces should be removed from the design if the VC is permitted to be built over water.

Size & layout of Bird Hide

When the HTR Project was first put before the stakeholders and the wider public Portsmouth Water repeatedly assured everyone that the education hide would be designed to have a multi-purpose use to optimize the benefits to the community. The design and layout of the hide now focus on providing an educational use only rather than a place that all can enjoy when not required for specific educational visits. The Council wishes to see the Bird Hide made available for all (young and old, able and disabled), otherwise it is a waste of an asset for much of the time. To have such an asset only for use by a small section of the community goes against the fundamental ethos of inclusiveness. In summary the design of the hide needs a fundamental re-

think, be less impactful on the landscape and thus be like normal low-aspect hides with long narrow viewing slots with shuttering and with decent wheelchair access. As designed the hide is not fit for purpose and is more about the architect's need to produce something dramatic in design.

Specific concerns about the hide design are:

a) The approach route is substandard in that in winter the reedbed will not be adequate to screen visitors and so wild life will not approach the hide except for human-habituated species. Most bird hides have wood screens on the approach route and the route itself is keep as far away from the water by geometry as possible. Also, a gate is required well before the hide with signage to make it clear that dogs are not permitted on the final approach path or in the hide itself.

b) 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. At the same time the 4.5m build height is completely unnecessary and does not fit in with the design objective, which was to blend in with the rural setting, it does not do that. The metal roof will make the hide very hot in summer and very noisy when it rains.

c) 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.

d) The drawings of the Education Bird Hide show a technical discrepancy that is fundamental to its purpose. In the technical drawings of the south-east and south-west elevations overlooking the wetland, it is indicated that the windows are ceiling to floor PPC aluminium framed double-glazed windows set between reclaimed Oak fins (no.9 in the drawing notes). They look exactly the same as the PPC aluminium framed double-glazed window on the north-east elevation technical drawing (no.5 in the drawing notes). However, in the 'NW Corner Reserved Matters Application - Planning Statement (Final)' document page 19 it states, "The hide will accommodate a half-class group of students with two teachers and will be very minimally serviced. Shutters open to provide discrete viewing slots to observe wildlife."

This is extremely confusing. Is the educational bird hide being fitted with ceiling to floor double glazed windows as the technical drawings suggest or is it being fitted with the more traditional discreet shutter window design, which can be opened and closed, as suggested in the 'NW Corner Reserved Matters Application - Planning Statement (Final) document'? The Council view is that floor to ceiling glass is a fundamental design flaw and the last thing needed for an effective bird hide. When using optical devices to look out through glass that latter provides distortion and also visual interference because of the inevitable dirt that will accumulate over time on the glass. Also, the heat engendered by the sun shining through the glass in the summer will become unbearable. What is needed is walls of a solid nature (wood, rammed earth or similar) with shallow long openings with internal shutters as seen in every other bird hide ever visited by councillors, which hides the presence of humans leaving just the required aperture to look out and observe. The Council very firmly objects to the glass wall design that will go against the purpose of a bird hide, which is to hide humans!

The Council's opinion is that unless the whole hide design and approach is rethought the return on the investment will be very poor. The design smacks of an architectural grand idea rather than a low-profile building designed properly to reflect its purpose and should not be approved.

<u>Visitor Hub – Ground Maintenance Store</u>

The original outline planning application made provision for a grounds' maintenance workshop cum 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. 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 and the space provided in the Hub design is too small to be fit for purpose.

a. 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, strimmers, volunteer tools (saws, spades etc.), safety equipment and signage needed for site maintenance.

b. 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. There is no provision indicated anywhere else for additional space.

c. 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 can access it easily to load vehicles from the road without having to carry equipment through the main family circulation area between the kiosk and toilets.

d. Where ill fuel and oil be stored for the equipment? The cupboard allocated appears inadequate.

Overall, the provision for site maintenance equipment and associated work is inadequate and needs to be re-thought.

<u>Non-compliance with multiple reserved matters design criteria set out in the hybrid outline design permission</u>

Pages 23-28 of the Design Principles in the applicant's Planning Statement give various design requirements that have not been met. Some examples are:

a. Intelligent design has not been used in the siting of the VC over water. There is no vehicle access to the VC. The siting maximizes the need for both manual handling and double handling of all supplies needed for the VC and all waste to be removed. 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.

b. 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 but makes the VC stand out and be visible from around the entire reservoir site, which is unnecessary.

c. The 3 turrets design adds unnecessary height and visibility which the designers indicate are included to provide drama. Drama is not required! In Council's (and others' opinion) the Figure 2 visualization in the Planning Statement (as well as page 5 & 40 in the Design & Access Statement) makes the VC looks like a vessel stranded in the wetland.

d. The design aim was to minimize whole life costs such as maintenance and need for replacement ensuring durability in a challenging public setting. Siting the VC over water increases the whole life costs considerably in aspects such as maintenance, the pumped drainage system and any degradation of the pontoon requiring replacement.

e. It was stated that the VC should include a waterside terrace (when the VC was assumed to be located on-shore), there was no requirement for the terrace to be over water or for terraces all around the building.

Material change to the proposal for 'Out of Hours Use' of the facilities

The outline design for the original hybrid planning application assumed no evening use of the Visitor Centre to minimize the impact on the nighttime ecology. This was part of the environmentally-led design, including no traffic movements through the ancient woodland at night. In discussion of this particular issue at Stakeholder meetings attendees were assured by Portsmouth Water that the facilities would be closed at night and the Northern and Southern Access roads would be closed off by gates at their entry point. Any suggested evening use i.e. after dusk is therefore a material change that must be considered as part of the environmental impact assessment for the VC, requiring detailed consideration of the traffic impacts, landscape and visual impact, biodiversity impacts including on ancient woodland, valuable wetland habitats and the species that use them (bats, badgers, nightjars, glow worms etc.). If evening use is proposed it is even more important that the building should be located so as to help minimize the impact on the area's wildlife and flora 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.

The Council is greatly concerned that, because of the planned evening use, lighting is proposed for this area over and above emergency lighting that should only be required at night in an emergency. The reservoir is an environmentally-led project, which is what gained it widespread support amongst the community, yet the provision of lighting, however subdued, in the area of the VC and the carpark directly contradicts this approach. Wildlife is badly affected by artificial light and even downward-pointing subdued lighting will have an adverse effect. The VC being over water would compound the lighting effect because the surrounding water will just reflect the light into the wider environment. The Council objects to the provision of lighting other than that required to be switched on in case of an emergency on site during the hours of darkness.

If Portsmouth Water now insist they want to keep the VC open after dusk then the Environmental Impact Assessment (EIA) needs to consider lighting impacts, traffic through the ancient woodland and overall impact on night time ecology. The original planning application EIA assumed no night time use and no vehicles along the access track through the ancient woodland because of concerns about the impact and risk to ecology (bats, badgers, nightjars etc.) and the Parish Council was happy with the application because of the no-night-time use. Any change to this is a material change and so the LPA is requested not to determine the VC application until the planned opening times have been promulgated allowing interested parties to comment and also the EIA has been updated. At present the Council is firmly against any use in dark hours between sunset and sunrise.

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

a. As just stated there is no statement as to opening and closing times for the VC and the recreational area/carpark. Knowledge of this is essential to allow for interested parties to provide informed comment.

b. There is no scientifically-based objective evidence that the VC building location minimizes disturbance to the wildlife. It was indicated that it would 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 or made available.

c. 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.

d. A number of important stakeholder engagement documents are missing. These include:

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

b. The Statement of Community Involvement for the VC 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.

c. 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.

This lack of transparency is concerning and these documents should be added to the website and advised to interested parties for comment prior to determination.

Overall, the VC project is not going to deliver the environmentally friendly and wildlife friendly facilities as expected from earlier discussions by stakeholders with Portsmouth Water and much more work needs to be done to address the issues raised to deliver the right solution.

If despite these significant reasons for the Council objecting the LPA is minded to approve the application based on the information provided the following conditions should be applied:

a. No external terrace should be provided on the North-east and south-east sides of the VC itself and a revised layout for the external terraces should be submitted to and approved by the PLPA before work on the VC commences. (This is to reduce the disturbance to wildlife by humans and provide an unobstructed view from the VC windows).

b. No external lighting to be provided on the north-east and south-east side of the VC so as to reduce disturbance to wildlife.

c. A new bird hide design should be submitted that allows for the use by all people when educational visits are not taking place with a larger footprint and minimalist design that blends into the landscape.

d. No use of the VC or Hub during the hours of darkness i.e. from sunset to sunrise.

e. No public vehicle access to car parks with vehicle barriers to be closed and locked after dark. (To prevent disturbance to wildlife within the Havant Thicket from vehicles transiting the Northern Access Road.)

f. That provision for a Grounds Maintenance Store equivalent to that originally proposed in the hybrid outline application within the Control House be made and approved by the LPA in advance of the VC building and the Hub being approved.

g. Details of measures to be used to prevent dogs and people from accessing the shore of the retained wetland compartment 4 and the retaining structure islands shall be

submitted to the LPA and approved before the commencement of works in the NW 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.

Kind Regards

Dominic Harland-Jones
Clerk to Rowlands Castle Parish Council