The Planning Inspectorate
Yr Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed Hampshire Water Transfer & Water Recycling Project

Case Reference: WA010002

Adopted by the Planning Inspectorate (on behalf of the Secretary of State) pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

31 August 2023

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1. INTRODUCTION

1.0.1 On 21 July 2023, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from Southern Water Services Limited (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed Hampshire Water Transfer & Water Recycling Project (the Proposed Development). The Applicant notified the Secretary of State (SoS) under Regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development and by virtue of Regulation 6(2)(a), the Proposed Development is 'EIA development'.

1.0.2 The Applicant provided the necessary information to inform a request under EIA Regulation 10(3) in the form of a Scoping Report. The Scoping Report is submitted as seven files in three separate volumes, with the third volume comprising five parts. It is available from the following links:

- Hampshire Water Transfer & Water Recycling Project: EIA Scoping Report – Volume I Main Report

  http://infrastructure.planninginspectorate.gov.uk/document/WA010002-000035

- Hampshire Water Transfer & Water Recycling Project: EIA Scoping Report – Volume II Appendices

  http://infrastructure.planninginspectorate.gov.uk/document/WA010002-000036

- Hampshire Water Transfer & Water Recycling Project: EIA Scoping Report – Volume III Figures Part 1 of 5

  http://infrastructure.planninginspectorate.gov.uk/document/WA010002-000037

- Hampshire Water Transfer & Water Recycling Project: EIA Scoping Report – Volume III Figures Part 2 of 5

  http://infrastructure.planninginspectorate.gov.uk/document/WA010002-000041

- Hampshire Water Transfer & Water Recycling Project: EIA Scoping Report – Volume III Figures Part 3 of 5

  http://infrastructure.planninginspectorate.gov.uk/document/WA010002-000042

- Hampshire Water Transfer & Water Recycling Project: EIA Scoping Report – Volume III Figures Part 4 of 5

http://infrastructure.planninginspectorate.gov.uk/document/WA010002-000038

- Hampshire Water Transfer & Water Recycling Project: EIA Scoping Report – Volume III Figures Part 5 of 5

  http://infrastructure.planninginspectorate.gov.uk/document/WA010002-000039

1.0.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the Proposed Development as currently described by the Applicant. This Opinion should be read in conjunction with the Applicant's Scoping Report.

1.0.4 The Inspectorate has set out in the following sections of this Opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the Applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.

1.0.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in Appendix 1 in accordance with EIA Regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in Appendix 2. These comments have been taken into account in the preparation of this Opinion.

1.0.6 The Inspectorate has published a series of advice notes on the National Infrastructure Planning website, including Advice Note 7: *Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping* (AN7). AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.

1.0.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/

1.0.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (eg on formal submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure

Project (NSIP) or Associated Development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.1 Description of the Proposed Development

(Scoping Report Volume I Main Report Chapters 1 and 3)

ID	Ref	Description	Inspectorate's comments
2.1.1	Paragraph 1.5.4	Phasing of development	The Scoping Report states that the proposed water recycling plant (WRP) is likely to be delivered in two phases, with the first phase producing 20 million litres per day (Ml/d) of recycled water at peak operation and the second phase increasing peak output to a total of 60 Ml/d recycled water. The assessment in the ES should include consideration of any additional or different impacts arising from the phasing of the Proposed Development, based on the worst case allowed for in the draft Development Consent Order (dDCO). Any assumptions made, for example in respect of the start date and duration of each construction phase, should be explained.
2.1.2	Paragraphs 1.3.8, 1.5.7 and 3.2.1	Maximum output through pipelines	The approximate maximum output of the Proposed Development would be 90 Ml/d through the underground pipeline between Havant Thicket Reservoir and Otterbourne Wastewater Treatment Works (WSW). It is stated that this would be during severe drought conditions. The output through other pipelines within the Proposed Development would be between 60 Ml/d and 80 Ml/d once all phases are operational and there would be a continuous sweetening flow of approximately 20 Ml/d. The ES should explain what would comprise severe drought conditions and any assumptions that have been made about the frequency and duration of such conditions for the purposes of assessment. The maximum output required for the sweetening flow should be confirmed and an explanation as to why this volume is

ID	Ref	Description	Inspectorate's comments
			required. The ES should clearly define the worst case scenario allowed for within the dDCO and use that as the basis for the final study areas selected for the assessment of effects arising from operation of the Proposed Development.
2.1.3	Paragraphs 1.5.12, 3.1.5 and 3.3.5	Reject water via Eastney transfer tunnel (TT) and long sea outfall (LSO)	The Scoping Report states that no physical changes are proposed to the Eastney TT and LSO but the Applicant might need operational powers over the existing infrastructure in the dDCO. Reject water from the WRP would be discharged through this existing infrastructure. The ES should explain the nature of these operational powers and how they would relate to the operation and maintenance of the Proposed Development. Any impact pathways arising from the exercise of such powers should be assessed in the ES where significant effects are likely to occur.
2.1.4	Paragraph 3.3.5	Water quality failure event	In a water quality failure event, water would be returned via the reject stream from the proposed WRP to Budds Farm Wastewater Treatment Works (WTW) and then discharged via Eastney LSO while a shutdown is initiated. The ES should describe any assumptions made in the assessments about the likely frequency and duration of such an event, and the expected composition of reject water discharged via Eastney LSO. Any likely significant effects should be assessed.
2.1.5	Paragraph 3.2.1	Optionality	Options remain under consideration for several components of the Proposed Development, including the underground pipeline between the WRP and Havant Thicket Reservoir, which could be a single continuous tunnel or two separate tunnels, with a connection at Bedhampton Springs. The location and number of intermediate

ID	Ref	Description	Inspectorate's comments
			pumping stations (IPS) and break pressure tanks (BPT) would be dependent on the final underground pipeline route. The ES should include an indication of the main reasons for the final option(s) chosen, including how environmental effects have been considered. If final options have not been selected at the point of application, the ES should assess all remaining options and identify any measures proposed to mitigate significant adverse effects.
2.1.6	Section 3.3	Works to existing infrastructure	The Proposed Development would connect into existing infrastructure at Budds Farm WTW, Otterbourne Water Supply Works (WSW) and Eastney outfall (including the TT and LSO) and proposed development at Havant Thicket Reservoir, which has planning permission. The ES should include diagrams and figures to illustrate the components of the Proposed Development and demonstrate how it interacts with existing infrastructure and planned development forming part of the wider project, including any mitigation secured for planned developments. The Applicant's attention is drawn to Natural England's comments (Appendix 2 of this Scoping Opinion) about mitigation tree planting secured for Havant Thicket Reservoir project. The Scoping Report indicates that in some instances upgrade works may be required to existing infrastructure, which may be pursued through separate consenting regimes. In other instances, no physical works are proposed but there would be changes to discharges affecting existing environmental permits. The ES should identify and describe all consequential or related works and/ or changes to permits required as part of the wider project, including those that are proposed to be delivered outside of the DCO. It should confirm the mechanism for delivering these works and the status of any application(s). Any likely significant effects arising from

ID	Ref	Description	Inspectorate's comments
			the cumulation of the Proposed Development and such works should be assessed in the ES.
2.1.7	Paragraph 3.3.23 to 3.3.34	Associated development	The Applicant should clearly define what elements of the Proposed Development are integral to the NSIP, and whether any elements are 'Associated Development' under the PA2008 or ancillary matters. Any proposed works and / or infrastructure required as Associated Development or an ancillary matter (whether on or off-site) should be assessed as part of an integrated approach to environmental assessment. This includes the temporary construction hub, even where this is located outside of the Order limits and may have been consented through a different regime.
2.1.8	Paragraphs 3.3.3 and 3.6.4	Development parameters for the WRP	The ES should confirm the final parameters (minimum and maximum dimensions) of the WRP, including any access roads (if required) and parking provision. It should assess any likely significant effects resulting from the construction, operation/ maintenance, or decommissioning of the WRP.
2.1.9	Paragraphs 3.3.4 and 3.3.16 to 3.3.20	Above ground plant (AGP)	The ES should confirm the maximum number, location and final parameters (minimum and maximum dimensions) of all AGP, including the high lift pumping station (HLPS), IPS and BPT, including any access roads (if required). It should assess any likely significant effects resulting from construction, operation/ maintenance, or decommissioning of the AGP.
2.1.10	Paragraphs 3.5.4 to 3.5.15	Pipeline installation methods and special crossings	The Scoping Report describes a range of pipeline installation methods that could be used, stating that most of the pipeline is likely to be installed using open-cut techniques with a working width of 40m. Trenchless methods may be used where crossings are required that are not suited to open-cut methods.

ID	Ref	Description	Inspectorate's comments
			The ES should confirm the methods assumed for each section of pipeline. If flexibility is sought regarding the use of open cut or trenchless techniques, the ES should assess the available options or identify and assess a worst case scenario. The ES should define the applicable parameters for the construction working width and the pipeline trenches for each installation method proposed or apply a worse case. It should be clear how these parameters are secured through the dDCO or other legal mechanism. The Applicant's attention is drawn to the comments of Natural England (Appendix 2 of this Opinion) regarding potential impacts from pipeline crossings of the River Itchen SAC, River Meon and River Hamble. The ES should confirm the proposed crossing technique for these receptors and assess the likely significant effects. Effort should be made to agree the scope of survey required to inform the assessments with relevant consultation bodies. The Applicant's attention is drawn to Portsmouth Water's comments (Appendix 2 of this Opinion) regarding potential constraints to undergrounding of pipeline in several locations and the need to install pipeline above ground. It should be clear within the ES where pipeline is to be installed above ground and the likely significant effects arising from this method should be assessed.
2.1.11	Paragraphs 3.3.23 to 3.3.32	Temporary site compounds	The ES should describe what parameters have been used in the assessment for temporary site compounds, including the total number, locations, dimensions of any buildings and parking numbers.
2.1.12	Paragraphs 3.3.33 to 3.3.34	Temporary water storage lagoons	A temporary lagoon for storage of water is proposed to be located approximately every 3km along the pipeline route. The ES should confirm the maximum number of lagoons proposed, together with their width, depth and volume. It should explain how the land used for the lagoons would be reinstated following construction.

ID	Ref	Description	Inspectorate's comments
2.1.13	Paragraphs 3.5.1 to 3.5.2	WRP piling method	The WRP is proposed to be constructed on the site of a former landfill. The Scoping Report states that piling requirements would be informed by assessment of ground conditions to ensure the landfill's integrity is not affected. The Inspectorate considers that the assessment of ground conditions should be undertaken to inform assessment in the ES so that the likely significant effects are fully understood. A piling risk assessment and strategy should also be provided with the ES.
2.1.14	Paragraph 3.6.5	External lighting	The Scoping Report indicates that there would be external lighting at the WRP during operation. No information is provided about external lighting during construction. The ES should describe the location and design of external lighting, including along construction working widths and at construction compounds. Any likely significant effects should be assessed. The design standards that any additional lighting required during construction and operation will be required to meet should also be described in the ES, including any measures incorporated to avoid intrusive lighting impacts for sensitive receptors such as the South Downs National Park (SDNP), which is an International Dark Sky Reserve.
2.1.15	Paragraphs 3.6.7 to 3.6.14	Development parameters for underground pipelines	The ES should confirm the final parameters (minimum and maximum dimensions) of the underground pipelines and associated components such as isolation valves, air valves and washout chambers. It should also include details of required easements for pipeline maintenance, to ensure that the likely impacts from the Proposed Development are fully understood.

ID	Ref	Description	Inspectorate's comments
2.1.16	N/A	Natural resources	The ES should include a description of the nature and quantity of natural resources proposed to be used during construction and operation, including: ▪ Any additional water supply required, including the predicted volume and source. ▪ Substances required for the micro-filtration and advanced oxidation processes, including the predicted volume and source of supply. ▪ Energy requirements for the operation of WRP and pumping stations, including the predicted demand and source. ▪ Materials required for the construction, operation and maintenance of the Proposed Development, including any additional material required resulting from the extraction of sand and gravel in affected Minerals Safeguarding Areas (MSA). Any likely significant effects arising from these matters should be assessed in the ES.
2.1.17	N/A	Residues and emissions	The ES should include an estimate of expected residues and emissions produced during the construction and operational phases. This should include the predicted volume and composition of waste arising from excavation of the former landfill site to facilitate construction of the WRP. The Scoping Report indicates that for the underground pipeline installation, IPS and BPT, a cut and fill balance would be targeted. The ES should confirm the predicted volume of soil excavated from these components and any shortfall or remainder from the fill. The ES should confirm the volume of reject water anticipated to be discharged from the WRP based on the maximum output of the WRP, as well as its predicted chemical composition.

ID	Ref	Description	Inspectorate's comments
			The ES should describe the washout process, including the predicted frequency, chemical composition of the water and the methods for disposal of the water. The ES should describe the likely residues and emissions from the water recycling process and how these would be managed or disposed of. Any likely significant effects arising from these matters should be assessed in the ES.
2.1.18	N/A	Demolition	The ES should include a description of any demolition works required to facilitate construction of the Proposed Development. Any likely significant effects resulting from demolition works should be assessed.
2.1.19	N/A	Construction days and hours	The ES should confirm what construction days and hours have been assumed in the assessment and how these would be secured in the dDCO.
2.1.20	N/A	Construction access	The ES should describe the predicted number of vehicle movements, proposed construction access routes and any works proposed to existing roads and/ or access points to facilitate construction. This should include confirmation of any predicted hazardous loads and/ or abnormal indivisible loads (AIL) that would be required. Any likely significant effects resulting from their use should be assessed. Any assumptions, for instance in relation to the volume of soil may need to be brought to or removed from the site, should be explained.
2.1.21	N/A	Reference to local planning policy	The Inspectorate notes that several consultation bodies have made comments about errors in referencing to local planning policy within the Scoping Report (Appendix 2). Where the ES describes planning

ID	Ref	Description	Inspectorate's comments
			policy, reference should made to the relevant and up-to-date documents and policies.

2.2 EIA Methodology and Scope of Assessment

(Scoping Report Volume I Main Report Chapters 4 and 5)

ID	Ref	Description	Inspectorate's comments
2.2.1	Section 3.7 and paragraph 5.2.17	Decommissioning effects	The Scoping Report states that effects from decommissioning will be considered but that it is expected these would be similar to or less than construction phase effects. The ES assessment of impacts resulting from decommissioning in each aspect chapter should be proportionate but include a description of the process and methods of decommissioning, land use requirements and estimated timescales. Consideration should also be given to possible changes to the future baseline, including from climate change, which could have a bearing on decommissioning. The Scoping Report states that the Proposed Development is assumed to have a life cycle of a minimum of 100 years. The ES should confirm whether there are any components that may need to be dismantled or replaced on a shorter timeframe and, if so, provide an assessment of decommissioning impacts if significant effects are likely to occur. The Applicant's attention is drawn to the Environment Agency's (EA) comments regarding risk posed to the water environment by unused conduits, tunnels and pipes (see Appendix 2 of this Opinion). The Inspectorate considers that these components should be considered in the assessment of decommissioning effects.
2.2.2	Chapter 4	Order limits	The scoping area shown on Figures 1.1 and 1.2 is proposed to be refined further through scheme development and EIA processes prior to confirmation of the Order limits within the DCO application. The ES should include an explanation of any changes made following scoping,

ID	Ref	Description	Inspectorate's comments
			including how environmental effects have been considered in finalising the Order limits.
2.2.3	Chapter 4	Alternatives	Paragraph 4.1.4 of the Scoping Report references a separate document, Scheme Development Summary, from the Applicant's consultation in summer 2022, which provides further detail about alternatives assessed during the development of the project. The Inspectorate considers that this document should be submitted as part of the ES, eg as a technical appendix, together with any other relevant documentation that has been used to inform the consideration of alternatives through the Regulator's Alliance for Progressing Infrastructure Development (RAPID) gated process.
2.2.4	Paragraph 5.2.13	Effects arising from temporary construction hub	The Scoping Report states that the temporary construction hub location is unknown and it may be located outside of the scoping area. If this is the case, potential effects would be screened and assessed as appropriate, including through further fieldwork. The Inspectorate considers that effort should be made to discuss and agree the scope of any additional survey and assessment work with relevant statutory consultation bodies once the location of the temporary construction hub is confirmed. Evidence of steps taken and the level of agreement reached should be presented in the ES.
2.2.5	Paragraphs 5.2.17 to 5.2.18	Operational phase effects	The Scoping Report states that the Applicant is not seeking a time limited consent and the operational life will not be specified in the DCO application but as worst case permanent effects of the operational phase, which is assumed to be a minimum of 100 years will be assessed. It is also stated that no significant effects are considered likely for maintenance activities. Given the expected life of the Proposed Development, the ES should describe whether any major replacement work is likely to be required during its operation and, if so, what it is expected to comprise,

ID	Ref	Description	Inspectorate's comments
			together with the frequency and duration of any works. The ES should assess any likely significant effects arising from such activity.
2.2.6	Paragraph 5.2.19	Duration of potential effects	The Inspectorate notes that the definition of short term for the construction period covers a relatively long period of time, ie the entirety of the construction period plus 1 year of reinstatement, which could extend to six years. The Inspectorate considers that care should be taken in the determination of significance so that potentially significant construction phase effects are not underreported on the basis that they are short term in duration.
2.2.7	Paragraphs 5.2.36 to 5.2.37	Flexibility	The Inspectorate notes the Applicant's desire to incorporate flexibility into their draft DCO (dDCO) and its intention to apply a 'Rochdale Envelope' approach for this purpose. Paragraph 5.2.37 states that the *"…assessment will be based on a realistic worst-case approach. The assessment will establish those parameters likely to result in the realistic worst-case approach and be undertaken accordingly to determine significance."* The Applicant should make every attempt to narrow the range of options and explain clearly in the ES which elements of the Proposed Development have yet to be finalised and provide the reasons. At the time of application, any Proposed Development parameters should not be so wide-ranging as to represent effectively different developments. The development parameters, including any limits of deviation, should be clearly defined in the dDCO and in the accompanying ES. It is a matter for the Applicant, in preparing an ES, to consider whether it is possible to robustly assess a range of impacts resulting from many undecided parameters. The description of the Proposed Development in the ES must not be so wide that it is insufficiently

ID	Ref	Description	Inspectorate's comments
			certain to comply with the requirements of Regulation 14 of the EIA Regulations. It should be noted that if the Proposed Development materially changes prior to submission of the DCO application, the Applicant may wish to consider requesting a new scoping opinion.
2.2.8	Paragraph 5.2.42	Monitoring of mitigation	Paragraph 5.2.41 of the Scoping Report states that proportionate monitoring of mitigation measures will be proposed where appropriate to monitor effectiveness of mitigation. The ES should identify for which mitigation measures monitoring is required and, where it is, describe who would be responsible, the frequency of monitoring, any reporting required, how the need for any remedial action would be ascertained and how this would be implemented. It should be clear how these matters would be secured in the dDCO.
2.2.9	Paragraph 5.2.43	Mitigation	The Scoping Report states that mitigation will be secured by way of requirements in the DCO or through other appropriate control mechanisms. Only mitigation measures which are a firm commitment and can be shown to be deliverable should be taken account in the assessment. The DCO application should set out how measures proposed in the ES are secured, which could be through a summary table on mitigation.
2.2.10	Paragraph 5.2.44	Management plans	The Scoping Report identifies various management plans and mitigation strategy documents that will be produced with iterations as the detailed design is developed. It is stated that these would be secured and delivered through the DCO. The Inspectorate considers that drafts or outlines of all management plans and mitigation strategies identified within the ES, which are

ID	Ref	Description	Inspectorate's comments
			relied upon to mitigate significant adverse effects, should be submitted with the DCO application. The Applicant should consider submitting a hierarchy of plans document that demonstrates how management plans relate to one another.
2.2.11	Paragraph 5.2.48	In-combination effects	The Scoping Report states that in-combination effects, ie those that result from the interaction between the individual effects of the Proposed Development, will be considered within each individual ES aspect chapter. The Inspectorate considers that this approach is acceptable provided that the ES clearly describes any likely significant effects arising from the interaction of environmental aspects of the Proposed Development during its construction, operation and decommissioning. A summary table within the cumulative effects chapter may assist in this regard.
2.2.12	Paragraphs 5.2.51 to 5.2.52	Transboundary	The Inspectorate on behalf of the SoS has considered the Proposed Development and concludes that the Proposed Development is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area State. In reaching this conclusion the Inspectorate has identified and considered the Proposed Development's likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency and reversibility of the impacts. The Inspectorate considers that the likelihood of transboundary effects resulting from the Proposed Development is so low that it does not warrant the issue of a detailed transboundary screening. However, this position will remain under review and will have regard to any new or materially different information coming to light which may alter that decision.

ID	Ref	Description	Inspectorate's comments
			Note: The SoS' duty under Regulation 32 of the 2017 EIA Regulations continues throughout the application process. The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the Annex to its Advice Note Twelve, available on our website at http://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/
2.2.13	Paragraph 5.5.5	Biodiversity net gain (BNG)	The assessment of BNG reported within the ES should be based on an appropriate metric that allows clear understanding of how gains and losses have been calculated. The ES should clearly distinguish between mitigation for significant adverse effects on biodiversity from wider enhancement measures. It should be clear how and where the delivery of BNG has been secured.
2.2.14	Paragraph 21.3.2	ES technical appendices	The Scoping Report includes a (non-exhaustive) list of documents that will be used to inform the ES, either as technical appendices or standalone reports. The Inspectorate considers that documents forming part of the assessment in the ES should be incorporated as technical appendices so that the ES presents a comprehensive report of the EIA.
2.2.15	N/A	Assessment of effects arising from discharge of water to surface, ground and coastal water, including from emergency overflow of Havant Thicket Reservoir during operation	The Inspectorate considers that the ES should provide an assessment of effects arising from potential changes to water quality arising from all discharges to surface, ground and coastal waters during operation, including from potential emergency overflow/ reservoir overtopping of Havant Thicket Reservoir. This matter is of relevance to several aspects, including terrestrial and freshwater biodiversity, marine biodiversity and the water environment, given the potential for downstream impacts to habitats and species. The relevant chapters of the ES should include an assessment of the implications of any changes in water quality of affected aspects.

ID	Ref	Description	Inspectorate's comments
2.2.16	N/A	Assessment of effects arising from construction on a former landfill site	The Inspectorate considers that the ES should provide an assessment of effects arising from construction of the WRP on the former landfill, in respect of the potential release of leachates and gases. The assessment should consider human, ecological and water receptors. The Applicant's attention is drawn to the comments of the EA, Natural England, Havant Borough Council and East Hampshire District Council, and Rowlands Castle Parish Council (Appendix 2 of this Opinion) in this regard.
2.2.17	N/A	Assessment of effects to the SDNP	The Inspectorate considers that the assessment of effects to the SDNP should include consideration of the special qualities of the SDNP and all relevant guidance and baseline data, including the SDNP Management Plan, Viewshed Study Report and tranquillity mapping.

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Air Quality & Odour

(Scoping Report Volume I Main Report Chapter 6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	Paragraphs 6.6.6 to 6.6.8 and Table 6-9	Impacts on human and ecological receptors from odour during construction	The Scoping Report identifies the potential for odour emissions during excavation works for the WRP due to the proposed location on a former landfill site. It is proposed to scope this matter out of assessment based on no significant odour issues being raised as part of another scheme located on the former landfill site, which has been granted planning permission, and that any odour produced would be short in duration (ie the duration of the excavation works) and could be adequately mitigated to avoid adverse effects. The Inspectorate acknowledges that a previous planning permission may have been granted in the vicinity of the proposed WRP location. However this relates to a different form of development and limited information has been presented as to whether the nature of the construction activities is comparable. The Inspectorate considers that there is a potential impact pathway, as ground works associated with the Proposed Development have the potential to release odour, which could affect human receptors. Limited information has been provided about the likely duration of these works. The Inspectorate considers that the ES should provide an assessment of impacts from odour emissions to human receptors for the construction phase of the WRP or demonstrate that no likely significant effects would occur and agreement from relevant consultation bodies. Any mitigation relied upon should be clearly described in the ES and secured through the DCO.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The Inspectorate agrees that this matter can be scoped out for ecological receptors as they are not likely to be sensitive to odour emissions.
3.1.2	Paragraph 6.6.9 and Table 6-9	Impacts on human and ecological receptors from dust and particulate matter during operation	The Scoping Report proposes to scope this matter out on the basis that the activities involved in the operation of the Proposed Development have inherently low dust generation potential. The Inspectorate agrees that the operation of the Proposed Development is unlikely to produce dust on a scale that would result in significant effects. This matter can be scoped out of further assessment.
3.1.3	Paragraph 6.6.10 to 6.6.11 and Table 6-9	Impacts on human and ecological receptors from road traffic emissions during operation	The Scoping Report states that whilst the operation of the Proposed Development may result in changes to traffic flows on the surrounding road network, it would not be of a scale that would result in significant air quality effects on human and ecological receptors as the daily movements fall below the screening criteria in the Institute of Air Quality Management (IAQM) guidance published in 2017. The Inspectorate agrees that providing traffic flows are confirmed as being less than the IAQM criteria for detailed assessment, and subject to our comments at ID 3.1.6 and 3.1.8 of this Scoping Opinion, this matter can be scoped out. The ES should also demonstrate that cumulative vehicle movements with other developments would not exceed the IAQM thresholds based on worst case assessments. If such confirmation is not possible, an assessment should be provided.
3.1.4	Paragraph 6.6.12 and Table 6-9	Impacts on human and ecological receptors from Non-Road Mobile Machinery (NRMM) and machinery emissions during operation	The Scoping Report Proposes to scope this matter out on the basis that the only source of emissions to air during operation would be from back-up diesel generators used for minimum periods in emergency use. The Inspectorate agrees that the use of these back-up generators is unlikely to have significant effects but does not have sufficient information to exclude the possibility of likely significant

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			effects. The Inspectorate considers that this matter should be assessed in the ES or it should demonstrate why significant effects are not likely to occur and agreement from relevant consultation bodies that the matter can be scoped out of assessment. The ES should confirm the likely frequency and duration of emergency generator use, the number of generators that would be required and their location.
3.1.5	Paragraph 6.6.13 and Table 6-9	Impacts on human and ecological receptors from odour emissions during operation	The Scoping Report proposes to scope this matter out on the basis that there would be no changes to Budds Farm WTW and the secondary treated effluent entering the proposed WRP has been shown to have an odour concentration of below 1.0 $ou_E/m^2/s$ which is *"the lowest concentration at which odour can be detected in laboratory conditions by 50% of a human test panel"*. On this basis, the Inspectorate is content to scope this matter out of further assessment but details of the surveys undertaken at other sites should be provided within the ES together with confirmation of any records of odour complaints from the existing operation. Any best practice measures or other mitigation, including design measures to avoid impacts, should be clearly secured through the dDCO.

ID	Ref	Description	Inspectorate's comments
3.1.6	Paragraph 6.5.24 and 6.7.5	Designated habitats	In determining whether any of the identified European sites should be taken forward for assessment of air quality impacts, reference should also be made to Natural England's guidance relating to assessment of road traffic emissions under the Habitats Regulations, NEA001.
3.1.7	Paragraph 6.7.2	Baseline data collection	The Scoping Report proposes to use local authority monitoring data, Defra background mapping and modelling to establish the baseline air

ID	Ref	Description	Inspectorate's comments
			quality conditions. It is not proposed to undertake any specific monitoring for the Proposed Development. The Inspectorate considers that this is an acceptable approach given the nature of the Proposed Development and availability of other data sources, which demonstrate that EQS are currently not exceeded across most of the study area. The ES should explain what approach has been taken to use of baseline data affected by restrictions during the Covid-19 pandemic, with reference to relevant guidance and any agreement with consultation bodies. The Inspectorate considers that reference should also be made to data available from the Air Pollution Information System (APIS) in respect of background air quality at designated nature conservation sites.
3.1.8	Table 6-6	Road traffic screening criteria	In applying the 0.15% increase or more of existing annual average daily traffic (AADT) (over 5 years) threshold from Joint Nature Conservation Committee (JNCC) Guidance on Decision-making Thresholds for Air Pollution (2021) to ascertain potential for significant effects, consideration should be given to the implications of restrictions during the Covid-19 pandemic in determining the AADT.
3.1.9	N/A	Human receptors	The ES should include a figure to identify the final study areas for the air quality assessment, including the location of human receptors that have been considered (in addition to ecological receptors, as shown on Figure 6.1 in Volume III).

3.2 Archaeology & Cultural Heritage

(Scoping Report Volume I Main Report Chapter 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.1	Paragraph 7.6.15	Effects to heritage assets located near to the Eastney TT and Eastney LSO during construction	The Scoping Report states that no physical works are anticipated to the Eastney TT and Eastney LSO during construction of the Proposed Development. As a result, no physical disturbance or change to the setting of designated and non-designated heritage assets are considered likely as result of including this existing infrastructure within the Order limits, aside from the connection at Budds Farm WTW which would be assessed. On the basis described in the Scoping Report, the Inspectorate agrees that the construction of the Proposed Development is unlikely to result in significant effects to heritage assets located in proximity to the Eastney TT and LSO and is content to scope this matter out of further assessment. This matter should be revisited if physical works are required. For clarity, the ES should confirm which assets are scoped out of the assessment on that basis and evidence any agreement with relevant consultation bodies.
3.2.2	Paragraph 7.6.16	Effects from works at the proposed Havant Thicket Reservoir during construction	The Inspectorate agrees that effects arising from the construction of the Havant Thicket Reservoir (aside from those relating to construction of the proposed pipeline and connections) do not need to be assessed on the basis that the DCO would not need to cover these matters as planning permission has already been granted. However, the ES should also assess the cumulative construction effects of the Proposed Development and Havant Thicket Reservoir in the event that the planning permission has not been implemented (and therefore the effects of the project do not form part of the baseline).

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.3	Paragraph 7.6.18	Effects to heritage assets located near to the Eastney TT and Eastney LSO during operation	Paragraph 7.6.18 states that "*no physical works or visible change*" are proposed at the Eastney TT and Eastney LSO during operation of the Proposed Development. Effects to designated and non-designated heritage assets during operation are proposed to be scoped out of further assessment. On the basis described in the Scoping Report, the Inspectorate is content to scope out effects to heritage assets located near to the Eastney TT and Eastney LSO during operation. However, should any additional maintenance of the Eastney TT and Eastney LSO be required beyond the existing arrangements that has the potential to affect heritage assets, this should be assessed in the ES where significant effects are likely to occur. The Inspectorate's comments at ID 3.2.2 apply equally to this matter.
3.2.4	Paragraph 7.6.18	Effects to heritage assets located near to Havant Thicket Reservoir during operation	The Applicant proposes to scope out this matter on the basis that there will be no physical works or visible change to the Havant Thicket Reservoir during operation. The Inspectorate agrees that the operation of the Proposed Development is unlikely to impact heritage assets located adjacent to Havant Thicket Reservoir and is content for this matter to be scoped out of further assessment. The Inspectorate's comments at ID 3.2.2 apply equally to this matter.
3.2.5	Table 7-8	Direct physical effects on designated heritage assets during operation	The Scoping Report states that operation of the Proposed Development would not cause direct physical effects to designated assets. On this basis, the Inspectorate agrees that direct physical effects, as defined within the Scoping Report (change to the fabric of an asset, hydrological change resulting in different ground conditions that could result in subsidence of buildings or other physical changes) to heritage assets can be scoped out of further assessment.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.6	Table 7-8	Direct physical effects on non-designated heritage assets during operation	The Scoping Report describes that potential hydrological changes leading to desiccated or inundated ground could result in direct physical effects. At this stage, the Inspectorate does not have sufficient information about known or unknown archaeological remains and deposits, and potential hydrological changes as a result of the existence of the Proposed Development to exclude the possibility of significant effects. The Inspectorate considers that this matter should be assessed in the ES or it should be demonstrated why significant effects are not likely to occur and agreement from relevant consultation bodies that this matter can be scoped out of further assessment.
3.2.7	Table 7-8	Indirect physical effects on designated and non-designated heritage assets during operation	The Applicant proposes to scope out indirect physical effects during operation on the basis that physical effects would only occur during construction. Based on information in the Scoping Report, the Inspectorate notes that the operation of the Proposed Development is not likely to generate indirect effects such as vibration, changes in ground conditions or dust deposition that would have an impact pathway to designated and non-designated heritage assets. On that basis, the Inspectorate is content for this matter to be scoped out of further assessment.
3.2.8	Table 7-8	Temporary change to the setting of heritage assets during operation	The Inspectorate agrees that temporary changes to the setting of heritage assets are unlikely to occur during operation and is content for this matter to be scoped out of further assessment.

ID	Ref	Description	Inspectorate's comments
3.2.9	Paragraph 7.4.2	Study area	The Scoping Report states that a general study area of 500m from the site boundary for non-designated assets and 1km for designated

ID	Ref	Description	Inspectorate's comments
			assets will be used to collect detailed information on the cultural heritage baseline to be used in the assessment. However, paragraph 7.4.2 notes that consideration will also be given to designated assets within 3km of the visible elements of the Proposed Development due to the potential effects caused by changes to their setting. The ES should clarify the relationship between the study areas proposed and explain how the 500m and 1km study areas have been selected. It should identify and describe any designated assets located outside of the 1km study area and within 3km of the site that may be affected by the Proposed Development. The ES should also explain how these designated assets were identified with reference to information obtained by site walkover, setting assessment, and Zone of Theoretical Visibility (ZTV). Effort should be made to agree the study area and heritage assets to be scoped into the assessment with the relevant consultation bodies.
3.2.10	Section 7.4	Palaeolithic and mesolithic finds	The Applicant's attention is drawn to Winchester City Council's comments (Appendix 2 of this Scoping Opinion) in relation to palaeolithic and mesolithic finds. In order to ensure a robust baseline in the ES, the Applicant is advised to refer to the data from the Jacobi and Wymer collections in addition to the the Historic Environment Record (HER).
3.2.11	Section 7.5	Baseline conditions	The Applicant's attention is drawn to Historic England's comments (Appendix 2 of this Scoping Opinion) in relation to assets on the Heritage at Risk register. In order to ensure a robust baseline in the ES, the Applicant is advised to refer to any relevant information from this data source about Fort Widley, Fort Southwick, Brambridge House and Southwick Conservation Area. The location of Southwick Conservation Area should be identified on a figure within the ES.

ID	Ref	Description	Inspectorate's comments
3.2.12	Paragraph 7.7.4	Archaeological surveys	The Applicant should ensure that the information used to inform the assessment is robust and allows for identification of heritage assets likely to be impacted by the Proposed Development. The Applicant should make efforts to agree the need and extent for intrusive archaeological investigations with relevant consultation bodies. Where necessary to inform the assessment and any mitigation required thereafter, intrusive investigations should be completed prior to submission of the DCO application and reported in the ES.
3.2.13	Table 7-4	Determining heritage importance	The ES should explain how heritage importance will be assigned to Registered Parks and Gardens (RPGs) and confirm the grade at which each RPG considered in the assessment is listed.
3.2.14	Paragraph 7.9.8	Site specific mitigation measures	The Scoping Report states that *"any further site-specific measures will be determined post-consent as the Proposed Development is progressed in a specific and bespoke manner."* For the avoidance of doubt, the ES should assess all likely significant effects to archaeology and cultural heritage and identify the mitigation required to address adverse effects. Mitigation should be secured in the DCO. Whilst some mitigation may be in draft or outline at DCO application, this should provide a clear framework through which detail can be developed.
3.2.15	N/A	Non-designated heritage assets	For clarity, the assessment of effects to non-designated heritage assets should include consideration of areas of non-designated historic landscape character and buildings that are non-designated heritage assets (ie not just locally listed buildings).

3.3 Terrestrial & Freshwater Biodiversity

(Scoping Report Volume I Main Report Chapter 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.1	Table 8-8 and Table 8-12	Statutory and non-statutory designated sites over 200m from the scoping area (excluding European sites, Sites of Special Scientific Interest (SSSI) and those hydrologically connected to the Proposed Development during construction and operation	The Applicant proposes to scope these matters out on the basis that due to the distance and lack of potential impact pathways present and through implementation of best practice measures no likely significant effects on statutory and non-statutory designated sites located over 200m from the scoping area are anticipated. The Inspectorate notes a discrepancy between Table 8-8 and 8-12 of the Scoping Report with Table 8-8 requesting to scope out designated sites and Table 8-12 requesting to scope out both statutory designated sites and non-statutory designated sites. For the avoidance of doubt, the Inspectorate considers that the Applicant is requesting to scope out the assessment of both statutory and non-statutory designated sites over 200m from the scoping area (excluding European sites, SSSIs and those hydrologically connected to the Proposed Development). In the absence of further information relating to receptors and potential impact pathways, the Inspectorate is not in a position to scope out these matters from the assessment. The Inspectorate considers that all sites with hydrological connectivity to the Proposed Development should be scoped in. In the absence of evidence demonstrating clear agreement with relevant statutory bodies, the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects. The ES should clearly define and justify the scoping area with agreement from relevant consultation bodies where possible. The ES should identify

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			any best practice measures relied upon to avoid significant effects and explain how these are secured through the dDCO.
3.3.2	Table 8-8	Eurasian beaver during construction and operation	The Applicant proposes to scope out an assessment of Eurasian beaver from the ES on the basis that the species is not considered to be present within the scoping area due to no records being identified in the desk study and catchments within the study area not being connected to any known release sites. On this basis, the Inspectorate agrees that an assessment of beavers can be scoped out of the ES.
3.3.3	Table 8-8	Great crested newt (GCN) during construction and operation	The Applicant intends to offset the effects of the Proposed Development on GCN by obtaining a licence through the Natural England (NE) District Level Licensing (DLL) scheme. The Inspectorate understands that the DLL approach includes strategic area assessment and the identification of risk zones and strategic opportunity area maps. The ES should include information to demonstrate whether the Proposed Development is located within a risk zone for GCN. If the Applicant enters into the DLL scheme, NE will undertake an impact assessment and inform the Applicant whether their scheme is within one of the amber risk zones and therefore whether the Proposed Development is likely to have a significant effect on GCN. The outcome of this assessment will be documented on an Impact Assessment and Conservation Payment Certificate (IACPC). The IACPC can be used to provide additional detail to inform the findings in the ES, including information on the Proposed Development's impact on GCN and the appropriate compensation required. The Applicant's attention is drawn to the comments from Havant Borough Council and East Hampshire District Council (Appendix 2), noting that these authorities state they are not part of a DLL scheme

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			for GCN. If it is not possible to use the DLL, the ES should include a full assessment of any effects on GCN resulting from the Proposed Development.
3.3.4	Table 8-8 and paragraphs 8.5.38 to 8.5.39	Terrestrial invertebrates during construction and operation	This Applicant proposes to scope this matter out on the basis that the desk study identified a small number of records of notable terrestrial invertebrates within the study area. In addition, given the habitats to be crossed by the Proposed Development, it is considered highly unlikely that the assemblages present are of sufficient importance to result in likely significant effects. The Applicant further states that the habitats to be affected by the Proposed Development are widespread throughout the scoping area and as such, it is anticipated that despite temporary habitat losses there would be sufficient habitat remaining in any one location to sustain the assemblages present. The Inspectorate notes that both Scoping Report Volume I Main Report and Scoping Report Volume II Appendices refer to suitable habitat for diverse invertebrate assemblages, which include nationally rare and scarce species within the scoping area. In the absence of further baseline information relating to notable invertebrate assemblages and potential impact pathways, the Inspectorate is not in a position to scope out these matters from the assessment. The ES should provide an assessment of these matters where there is potential for likely significant effects to occur or demonstrate that no likely significant effects would occur with agreement from relevant consultation bodies.
3.3.5	Paragraph 8.8.8	Surveys for reptiles, National Vegetation Classification (NVC) and hedgerows	The Scoping Report states that reptile surveys, NVC surveys and hedgerow surveys will be undertaken where preliminary surveys identify the potential for effects.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The Inspectorate notes that the Scoping Report identifies records of reptile species near to and within the scoping area, and 110.8km of hedgerow within the scoping area. The Inspectorate agrees with the approach set out but where further surveys are scoped out, the ES must present a clear justification for this approach. Effort should be made to agree the survey scope and methodology with relevant consultation bodies. Please note the Inspectorate's comments at ID 3.8.21 of this Scoping Opinion regarding hedgerows.
3.3.6	Table 8-12 and paragraphs 8.5.53 to 8.5.55	Other notable species during construction and operation	The Scoping Report does not propose species' specific surveys for hedgehog, brown hare and harvest mouse and Table 8-12 does not identify whether these species are to be scoped in or out of the assessment. Baseline information in the Scoping Report states that the desk study has returned records of hedgehog and harvest mouse within the scoping area and a record of brown hare within 150m of the scoping area. The ES should assess effects on these species, based on robust survey data or provide justification for scoping them out including evidence of agreement with relevant consultation bodies.
3.3.7	N/A	Ancient woodland and veteran trees during construction and operation	The Scoping Report identifies that there are areas of ancient woodland and veteran trees within 200m of the scoping area. For the avoidance of doubt, the ES should assess any likely significant effects to ancient woodland and veteran trees from the construction and operation of the Proposed Development.
3.3.8	N/A	Operational effects	The Scoping Report has not addressed the following potential impact pathways during operation of the Proposed Development: ▪ airborne pollution (eg from vehicle emissions);

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			▪ run-off; ▪ damage to or loss of habitat; ▪ killing and injury of protected and notable species; and ▪ disturbance/ displacement of protected and notable species through habitat loss and fragmentation. The ES should include an assessment of these impact pathways or otherwise demonstrate why likely significant effects would not occur and agreement from relevant consultation bodies.

ID	Ref	Description	Inspectorate's comments
3.3.9	Table 8-3 and Paragraph 8.4.4	Field surveys	The Scoping Report states that due to the size of the study area, it would not be appropriate to survey in its entirety but that fields surveys will be undertaken within the scoping area and a buffer distance. It is unclear as to the exact location of field surveys proposed. Assessment in the ES should be based on robust baseline data including field surveys. The extent of survey area should be clearly explained and justified in the ES for each receptor assessed. The survey effort should include areas of land proposed for mitigation of significant adverse effects. Given that the study area for habitats is stated to be 200m as the maximum distance for indirect effects from air and water, the Inspectorate considers that the survey area buffer for terrestrial habitats should be 200m not 50m. Effort should be made to agree the location of field surveys with relevant consultation bodies.
3.3.10	Table 8-3 and	Bird surveys	It is unclear whether the quoted field survey area of 50m buffer from the scoping area for terrestrial habitats and protected/notable species includes birds. The ES should confirm and justify the spatial extent of

ID	Ref	Description	Inspectorate's comments
	Paragraph 8.4.4		bird surveys undertaken and should consider whether any areas of functionally linked land (FLL) would be affected by the Proposed Development. The Applicant's attention is drawn to Natural England's comments (Appendix 2) regarding the potential for the Proposed Development to affect FLL of Special Protection Areas (SPA) scoped into the assessment.
3.3.11	Section 8.5 and Table 8-6	Potential disturbance of fish due to noise and vibration effects associated with construction activities	The Applicant's attention is drawn to the EA's comments (Appendix 2 of this Scoping opinion) regarding the absence of a baseline description for fish in the terrestrial and freshwater environment, and potential effects to fish and incubating eggs from drilling in proximity to these environments. The ES should identify the locations where fish could be affected by impacts from drilling and include a baseline description based on robust data, ie including the EA's Ecology and Fish Data Explorer. Where there is potential for likely significant effects to occur to fish from drilling during construction of the Proposed Development, these should be assessed in the ES. Effort should be made to agree the scope and method of baseline data gathering and assessment with relevant consultation bodies.
3.3.12	Table 8-6	Spread of invasive non-native species (INNS) and disease	The ES should consider the potential for INNS and disease to be spread via the transfer of water, particularly between catchments and provide an assessment where there is potential for likely significant effects to occur.
3.3.13	NA	Confidential annexes	Public bodies have a responsibility to avoid releasing environmental information that could bring about harm to sensitive or vulnerable ecological features. Specific survey and assessment data relating to the presence and locations of species such as badgers, rare birds and plants that could be subject to disturbance, damage, persecution, or commercial exploitation resulting from publication of the information,

ID	Ref	Description	Inspectorate's comments
			should be provided in the ES as a confidential annex. All other assessment information should be included in an ES chapter, as normal, with a placeholder explaining that a confidential annex has been submitted to the Inspectorate and may be made available subject to request.

3.4 Marine Biodiversity

(Scoping Report Volume I Main Report Chapter 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.1	Paragraph 9.3.7	Sand eel surveys	Paragraph 9.3.7 of the Scoping Report highlights the likely presence of two sand eel species within the study area and states that geophysical surveys were conducted which provide an indication of the sediments that can generally infer areas suitable for sand eel (and other fish species) spawning. It is further stated that as effects on juvenile fish and eggs will be assessed, further investigation of sand eels specifically would not add value to the EIA. It is proposed to scope out additional surveys on that basis. The Inspectorate does not consider that the Applicant has provided sufficient justification as to why sand eel surveys are not required. Surveys should be undertaken to inform the baseline description unless agreement is reached with relevant consultation bodies that these are not required. Evidence of this agreement should be provided in the ES.
3.4.2	Paragraph 9.4.3	Effects arising from underground pipelines between the WRP and Havant Thicket Reservoir and Havant Thicket Reservoir and Otterbourne WSW during construction and operation	The Scoping Report states that these components of the Proposed Development would have no interaction with the marine environment and are therefore proposed to be scoped out further assessment. The Inspectorate agrees that effects from these components can be scoped out on the basis described in the Scoping Report.
3.4.3	Tables 9-21 and 9-27	Potential effects on marine ecology from the introduction and/or INNS during construction and operation	The Scoping Report proposes to scope this matter out on the basis that no physical works are taking place with direct connection to the marine environment and there is therefore no pathway for INNS to enter the water column.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The Inspectorate agrees that this matter can be scoped out of further assessment on the basis described in the Scoping Report.
3.4.4	Tables 9-21 and 9-27	Potential effects on marine ecology (mammals and fish) from visual disturbance (human presence, vehicle movement and light pollution) during construction and operation	The Scoping Report proposes to scope this matter out on the basis that the seal haul-out site present within Langstone Harbour is thought to be over 2km from the terrestrial works and that, given the current usage of the harbour, seals using it are likely to be used to changes to the visual baseline. There would be no connectivity between tunnelling activity and the water column, so fish would not be affected. Reference has been made within the Scoping Report to the potential presence of harbour porpoise, bottlenose dolphins and minke whales within the study area but these are not referred to in Table 9-21. Based on the information in the Scoping Report, the Inspectorate agrees that it is unlikely that any marine mammals would be close enough to the location of works to be visually affected. However, as described at ID 2.1.4 of this Scoping Opinion, the ES should include information about external lighting. On that basis, the Inspectorate agrees that this matter can be scoped out of further assessment.
3.4.5	Tables 9-21 and 9-27	Temporary habitat loss during construction	The Scoping Report proposes to scope this matter out on the basis that there would be no connectivity between tunnelling activity and seabed habitats, as entry and egress of the pipeline would be in the terrestrial environment. It is noted that the potential for pollution events to affect marine biodiversity during construction is proposed to be scoped into the assessment, given the potential for spills into the marine environment. However, the Scoping Report does not address the possibility of likely significant effects on habitats as a result of

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			accidental releases of drilling fluid. The Inspectorate does not have sufficient information at present to exclude the possibility of likely significant effects from temporary habitat loss arising from pollution events. The ES should include an assessment of this matter or demonstrate why significant effects are not likely and agreement from relevant consultation bodies.
3.4.6	Tables 9-22 and 9-27	Direct habitat loss during operation	The Scoping Report proposes to scope this matter out on the basis that there is no land take or construction proposed within the marine environment that would result in the direct loss of marine habitat during operation. Noting that potential for indirect impacts to marine habitats arising from changes to discharge from the Eastney LSO are scoped into the ES (Table 9-20 of the Scoping Report), the Inspectorate agrees that this matter can be scoped out of further assessment the ES on the basis described in the Scoping Report.
3.4.7	Table 9-27	Underwater noise and vibration associated with construction of the proposed underground pipeline between Budds Farm and the proposed WRP on marine habitats during construction	The Scoping Report proposes to scope this matter out on the basis that the noise and vibration generated is likely to be highly localised and temporary in nature; the marine habitats identified in the Scoping Report are not sensitive to underwater noise and vibration. The Inspectorate agrees that this matter can be scoped out of the ES on the basis described in the Scoping Report.
3.4.8	Table 9-27	Underwater noise and vibration from the proposed underground pipeline between Budds Farm and the proposed WRP during operation	The Scoping Report proposes to scope this matter out for all marine ecology receptors on the basis that underwater noise and vibration would only be generated during the construction phase. The Inspectorate agrees that this matter can be scoped out of further assessment on the basis described in the Scoping Report.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.9	Table 9-27	Pollution events (from use of plant and machinery) during operation	The Scoping Report proposes to scope this matter out as during operation no works are planned to take place using substantial plant and best practice measures would be in place making the probability of significant effects from pollution negligible. The Inspectorate agrees that this matter can be scoped out of the ES on the basis described in the Scoping Report. The ES should describe the management and control measures that would be in place to avoid potential pollution events and confirm how these are secured through the dDCO.
3.4.10	Table 9-27	Changes in effluent discharge from Eastney LSO during construction	The Scoping Report proposes to scope this matter out on the basis that no change to the effluent currently discharged from the Eastney LSO would occur during the construction phase. The Inspectorate agrees that this matter can be scoped out of the ES on the basis described in the Scoping Report.

ID	Ref	Description	Inspectorate's comments
3.4.11	Paragraph 9.1.5	Effects to marine birds	The Scoping Report states that potential effects on birds that use the marine environment will be considered only within the ES Chapter Terrestrial and Freshwater Biodiversity to avoid repetition. The Inspectorate considers that this approach is acceptable provided that the assessment in the ES Chapter Terrestrial and Freshwater Biodiversity includes consideration of potential effects to birds in the marine area, such as wading birds, which may be affected by construction works near the harbour. Cross reference should be made in the ES Chapter Marine Biodiversity to the location of these assessments.

ID	Ref	Description	Inspectorate's comments
3.4.12	Table 9-2	Sites designated for marine mammals	Table 9-2 of the Scoping Report states that the zone of influence (ZoI) for sites designated for marine mammals is 30km. The Scoping Report states that grey seals are reported to conduct mean round trips of 39.8km. The ES should confirm whether there are any designated sites where seal is a qualifying feature beyond the 30km ZoI that could be affected by the Proposed Development and, if so, where likely significant effects could occur these should be assessed in the ES.
3.4.13	Section 9.7	Proposed assessment methodology	The Scoping Report provides a detailed explanation of how the significance of effects would be determined, based on the relevant guidance from the Chartered Institute of Ecology and Environmental Management (CIEEM). However, no description has been provided of the methods that will be used to assess impacts and whether these will be quantitative or qualitative. The methodologies used for the assessments must be described and their use justified with reference to appropriate guidance and/or agreement with the relevant consultation bodies.
3.4.14	Paragraph 9.7.1	Underwater noise modelling	The Scoping Report states that a decision as to whether underwater noise modelling is required will be taken following completion of geophysical survey to inform the drilling methodology for the proposed pipeline between Budds Farm WTW and the WRP. The Inspectorate considers that this work should be undertaken in time to inform the EIA. If underwater noise modelling is determined to be required, this should also be submitted with the ES and used to inform the assessment of disturbance effects. If it is not required, the ES should include a justification for why it is had not been undertaken, including evidence of agreement with relevant consultation bodies.

ID	Ref	Description	Inspectorate's comments
3.4.15	Paragraph 9.5.2	Marine Conservation Zones (MCZs)	The Scoping Report identifies that the Bembridge MCZ is within study area 2. Several MCZs are in the vicinity of the Eastney LSO, which have not been considered within the Scoping Report, namely, Utopia and Selsey Bill and the Hounds. These MCZs should be included in the assessment where there is potential for likely significant effects to occur or the ES should demonstrate the absence of likely significant effects with agreement from the relevant consultation bodies. The assessment of effects to Bembridge MCZ should include consideration of cumulative effects arising from the Sandown water recycling scheme.
3.4.16	Figure 9.1 in Volume III	Study areas	Figure 9.1 in Volume III shows three study areas, including Study Area 3 relating to construction works, which is not referenced in the Main Scoping Report in Volume I. The ES should explain how Study Area 3 relates to the assessment of effects.

3.5 Carbon & Climate Change

(Scoping Report Volume I Main Report Chapter 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.1	Paragraphs 10.6.2 to 10.6.3	Decommissioning effects	The Inspectorate agrees that decommissioning effects can be scoped out of the greenhouse gas (GHG) assessment based on the information presented in the Scoping Report. Please refer to the Inspectorate's comments at ID 2.2.1 of this Scoping Opinion in respect of the climate change resilience (CCR) and in-combination climate change impact (ICCI) assessments.
3.5.2	Paragraphs 10.6.9 to 10.6.10	CCR assessment during construction	The Scoping Report proposes to scope out a CCR assessment for the construction phase of the Proposed Development on the basis that construction is expected to take place within the next 15 years and any gradual changes to climatic conditions are not anticipated to impact this period. Paragraph 10.6.10 states that any climate related extreme weather events would be managed through construction management plans. The Inspectorate does not consider sufficient evidence has been provided to scope this matter out of the assessment given the potential length of the construction period (circa 5 years) and possibility of it being extended further through phased delivery, as described in the Scoping Report. The CCR assessment should assess climate risks during the construction phase (such as extreme temperatures, extreme precipitation or storm events) where significant effects are likely. The assessment outcome should be used to inform measures within the construction management plans. Please refer to the Inspectorate's comments at ID 2.2.10 of this Scoping Opinion regarding management plans.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.3	Paragraph 10.7.1	ICCI assessment during construction	For the same reasons as set out in ID 3.5.2 above, the Inspectorate does not agree to scope this matter out of the ES.
3.5.4	Paragraphs 10.8.13 to 10.8.14	Cumulative effects within GHG emissions assessment	The Scoping Report proposes to scope out cumulative effects in the GHG assessment on the basis that GHG emissions released to the atmosphere are inherently cumulative in nature due to the global effects of climate change. The Inspectorate is content with this approach and agrees to scope out cumulative effects in the GHG emissions assessment.
3.5.5	Paragraphs 10.8.15 to 10.8.16	In-combination effects within GHG emissions assessment	The Scoping Report states that as the receptor for the GHG emissions assessment is the global atmosphere there are no common receptors with other environmental aspects. The Inspectorate is content with this approach and agrees to scope out in-combination effects in the GHG emissions assessment.
3.5.6	Paragraphs 10.8.32 to 10.8.33	In-combination effects within CCR assessment	The Inspectorate agrees that the receptors for the CCR assessment are the Proposed Development itself and any associated infrastructure leading to no common receptors between the CCR assessment and other environmental aspect chapters. The Inspectorate agrees to scope out this matter from further assessment.

ID	Ref	Description	Inspectorate's comments
3.5.7	Paragraph 10.6.6	Operation and maintenance	The ES should ensure that the GHG emissions associated with maintenance of all elements of the Proposed Development have been considered within the GHG emissions assessment.

ID	Ref	Description	Inspectorate's comments
3.5.8	Paragraph 10.8.12	Assessment scenarios	The Scoping Report describes that the Proposed Development is a drought resilience scheme to develop capacity to address future forecasts for water deficits and as such development of representative scenarios to determine the effect of GHG emissions is not only a case of comparing emissions with and without the Proposed Development in place. It is stated that the establishment of assessment scenarios will be an ongoing process, but it is likely that the GHG assessment will consider scenarios associated with iterations of the design. This is stated to be in accordance with Institute of Environmental Management and Assessment (IEMA) guidance. The final assessment scenario used should be described in the ES, together with a rationale for its selection and explanation of any limitations in the approach.

3.6 Land Quality & Ground Conditions

(Scoping Report Volume I Main Report Chapter 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.1	Paragraph 11.6.12 and Table 11-15	Impacts on geologically sensitive sites during construction and operation	On the basis that no geologically sensitive sites have been identified within the scoping area or the 250m buffer zone, the Inspectorate is content that significant effects are not likely to occur. Impacts on geologically sensitive sites during construction and operation can be scoped out of further assessment.
3.6.2	Paragraph 11.6.13 and Table 11.15	Direct impacts associated with operation and maintenance	The Inspectorate considers there is a lack of information provided with regards to the likely maintenance activities associated with the proposed WRP and HLPS to support the proposed scope out of this matter. The Inspectorate also notes the quantities of chemicals required for operation of the proposed WRP (paragraph 3.6.4 of the Scoping Report). Accordingly, the Inspectorate is not in a position to scope out this matter for the WRP and HLPS. Direct impacts associated with operation and maintenance of the proposed WRP and HLPS should be assessed in the ES where significant effects are likely to occur or the ES should demonstrate why these are not likely with agreement from relevant consultation bodies. The Inspectorate is content that direct impacts associated with operation and maintenance of the other elements of the Proposed Development are not likely to result in significant effects and can be scoped out.

ID	Ref	Description	Inspectorate's comments
3.6.3	Sections 11.4 and 11.5	Study area and baseline data	The study area and scope of ground investigation should have sufficient coverage to ensure that the baseline conditions are understood for all areas where significant effects are likely to occur. The Applicant should make effort to agree the scope of ground investigation with relevant consultation bodies, including local authorities. The Applicant's attention is drawn to the EA's comments (Appendix 2) regarding karstic features of the ground conditions and the potential for increased risk of rapid movement of water and potential contaminants. The Inspectorate considers that the final study area selected should be informed by an understanding of these conditions to ensure that a robust assessment.
3.6.4	Section 11.6	Scope of assessment - remediation	The ES should include a full description of any remediation which may be required and confirm how this is to be secured. The ES should assess any likely significant effects which could occur as a result of remediation. Any assumptions in this regard (for example, traffic movements, waste handling, and contaminated land) should be clearly stated in the ES.
3.6.5	Paragraphs 11.6.4 to 11.6.5	Effects on groundwater during construction	In addition to the pathways identified, the assessment should consider the potential for contamination of groundwater from storage of oils, fuel and chemicals, where this is required during construction, the Inspectorate notes that this matter is scoped in for operation.
3.6.6	Figure 11.6 in Volume III	Figures	Figures accompanying Chapter 11 of the Scoping Report (Figure 11.6, sheets 1 to 6) do not contain a key/ legend. Relevant figures accompanying the ES Land Quality and Ground Conditions assessment should clearly present baseline information.

3.7 Land Use & Agriculture

(Scoping Report Volume I Main Report Chapter 12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.1	Paragraphs 12.6.28, 12.6.30 to 12.6.32 and Table 12-8	▪ Demolition of: residential properties and ancillary structures, community facilities, commercial property and agricultural buildings/ property - construction and operation; and ▪ Temporary loss of gardens or car parking areas – construction and operation.	On the basis that the Proposed Development does not require the demolition of any such properties/ structures/ facilities, or the temporary loss of gardens or car parking areas, the Inspectorate is content that these matters can be scoped out of further assessment. The Scoping Report confirms that should demolition become necessary, an assessment will be undertaken in the ES.
3.7.2	Paragraphs 12.6.37 to 12.6.41 and Table 12-8	Direct effects on residential property, community land and facilities, commercial property and land, development land and agricultural land (resulting from temporary loss of access and boundary features) during operation	Considering the nature and characteristics of the Proposed Development, the Inspectorate considers that significant effects during operation are unlikely. Direct effects on residential property, community land and facilities, commercial property and land, development land and agricultural land (resulting from temporary loss of access and boundary features) during operation can be scoped out.
3.7.3	Paragraphs 12.6.38 and 12.6.39 and Table 12-8	Direct effects on community land and facilities, and commercial property and land (resulting from temporary or permanent loss of commercial land) during operation	The Scoping Report identifies the potential for permanent loss of community land and facilities and commercial property and land, and this matter has been scoped into the construction phase assessment (paragraphs 12.6.8 and 12.6.12). The Scoping Report proposes to report these as permanent construction effects and to scope these matters out for the operational phase (paragraphs 12.6.38 and 12.6.39 and Table 12-8).

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			Providing the ES assessment conclusions for areas of permanent loss clearly reflect the duration of impact, the Inspectorate is content with this approach and that a separate assessment of these matters for the operational phase is not required. Direct effects on community land and facilities, and commercial property and land (resulting from temporary or permanent loss of commercial land) during operation can be scoped out. The ES should clearly identify which areas of community land and facilities, and commercial property and land are to be temporarily lost during construction and which are to be permanently lost. Losses should be quantified.
3.7.4	Paragraphs 12.6.26 and 12.6.40 and Table 12-8	Impacts on development land (including those resulting from temporary or permanent loss of development land; and future sterilisation of land allocations or committed schemes) during operation	The Scoping Report explains that the Proposed Development would result in the permanent loss of employment land and potentially, the permanent loss of land allocated for housing. These matters have been scoped into the construction phase assessment (paragraphs 12.6.15 to 12.6.17). The Scoping Report proposes to report this as a permanent construction effect and to scope out an assessment of impacts on development land during the operational phase (paragraphs 12.6.26 and 12.6.40; Table 12-8). Providing the ES assessment conclusions for areas of permanent loss clearly reflect the duration of impact, the Inspectorate is content with this approach and that a separate assessment of these matters for the operational phase is not required. Impacts on development land during operation can be scoped out. The ES should clearly identify which areas of development land are to be temporarily lost during construction and which are to be permanently lost. Losses should be quantified.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.5	Paragraphs 12.6.27 and 12.6.41 and Table 12-8	Impacts on agricultural land (including those resulting from temporary or permanent loss of agricultural land) during operation	The Scoping Report identifies the potential for permanent loss of agricultural land due to proposed AGP or permanent wayleaves for pipelines and this matter has been scoped into the construction phase assessment (paragraph 12.6.21). The Scoping Report proposes to report this as a permanent construction effect and to scope out an assessment of impacts on agricultural land during the operational phase (paragraph 12.6.27 and Table 12-8). Providing the ES assessment conclusions for areas of permanent loss clearly reflect the duration of impact, the Inspectorate is content with this approach and that a separate assessment of these matters for the operational phase is not required. Impacts on agricultural land during operation can be scoped out. The ES should quantify the amount of agricultural land that would be temporarily and permanently lost as a result of the Proposed Development by Agricultural Land Classification (ALC) grade.
3.7.6	Paragraphs 12.6.33 to 12.6.36 and Table 12-8	Impacts on soils during construction	The Scoping Report proposes to scope out this matter on the basis that construction would comply with established best practice soil management measures, including preparation of the four management plans listed in paragraph 12.6.35 of the Scoping Report. The Inspectorate is not in a position to scope this matter out of the ES without further details of the likely measures to be included in the management plans and how these would be secured through the dDCO. Accordingly, the ES should include an assessment of effects on soils or provide evidence of agreement with relevant consultees that this matter can be scoped out and an absence of LSE. The ES should identify the best practice measures and explain how these are secured through the dDCO.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			Please refer to the Inspectorate's comments at ID 2.2.10 of this Scoping Opinion regarding management plans.
3.7.7	Paragraph 12.6.42 and Table 12-8	Impacts on soils during operation	Considering the nature of the Proposed Development, the Inspectorate agrees that significant effects on soils during operation are unlikely and that this matter can be scoped out of further assessment. However, if any maintenance or repair works are required which would result in disturbance or other impacts to soils, the ES should identify the best practice measures relied upon to ensure that significant effects do not occur and explain how these are secured through the dDCO. Please refer to the Inspectorate's comments at ID 2.2.10 of this Scoping Opinion regarding management plans.

ID	Ref	Description	Inspectorate's comments
3.7.8	Paragraphs 12.6.24 and 12.6.25 and Table 12-5	Sensitive receptors	The Scoping Report identifies potential for impacts on the amenity of users of community facilities and commercial properties, where these "*…are particularly sensitive to changes in their operating environment*". Table 12-5 sets out value sensitivity criteria, but it is unclear how receptors *"particularly sensitive"* to changes in their operating environment would be identified. The ES should explain the approach to identifying and determining the sensitivity of receptors. Effort should be made to agree the sensitive receptors with relevant consultation bodies.

ID	Ref	Description	Inspectorate's comments
3.7.9	Paragraph 12.7.3	ALC surveys	The Scoping Report states that the baseline will include data from agricultural land surveys to identify the extent of best and most versatile (BMV) land that will be impacted permanently by the Proposed Development. The study area for the survey(s) should have sufficient coverage to ensure that the baseline conditions are understood for all areas of agricultural land where significant effects are likely to occur, noting that this should include locations of permanent construction impacts considering the Applicant's approach to assessment as addressed in ID 3.7.6 of this Scoping Opinion. The Applicant should make effort to agree the scope and method of the ALC survey with relevant consultation bodies, including local authorities.

3.8 Landscape & Visual Impact Assessment

(Scoping Report Volume I Main Report Chapter 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.1	Paragraph 13.3.2	Night-time photography	The Scoping Report states that no concerns were raised by consultation bodies[1] at a meeting of its Historic Environment and Landscape EIA Working Group in respect of its proposal not to undertake night-time photography. No information is presented about why this approach is proposed but the Inspectorate notes that night-time lighting effects are proposed to be scoped into the ES. The Inspectorate considers that the assessment of night-time lighting effects in the ES should be informed by baseline night-time photography. Effort should be made to agree the location and number of viewpoint locations with relevant consultation bodies.
3.8.2	Paragraph 13.6.5 and Table 13-23	Below ground pipeline in tunnel during construction	The Scoping Report states that there would be no changes to the landscape or visual baseline during construction from installation of pipeline within tunnel aside from at launch sites and intermediate shaft sites (which would be assessed in the ES). The Inspectorate agrees that this matter can be scoped out on the basis explained in the Scoping Report.
3.8.3	Paragraph 13.6.6	Havant Thicket Reservoir during construction	The Scoping Report states that proposed changes to the Havant Thicket Reservoir relate to the storage of recycled water and not the physical structure, and therefore changes to the landscape or visual baseline are not likely.

[1] Consultation bodies included representatives from: the eight host local planning authorities, Historic England, Natural England and Chichester Harbour Conservancy.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			Chapter 3 of the Scoping Report identifies that physical changes are proposed at the Havant Thicket Reservoir during construction. The reservoir is in proximity to several landscape designations shown on Figure 13.1 in Volume III of the Scoping Report. The Inspectorate does not have sufficient information to exclude the possibility of likely significant effects during construction from activities at Havant Thicket Reservoir. Accordingly, the ES should include an assessment of effects on this matter or provide evidence of agreement with relevant consultees that this matter can be scoped out and an absence of LSE.
3.8.4	Paragraph 13.7.9	Local landscape character areas (LLCAs)	The Scoping Report states that the Applicant will assess impacts to landscape character at a range of scales, from national to local, using published landscape character assessments and its own defined LLCAs to draw distinction between localised and wider ranging effects. The LLCAs are shown on Figure 13.3 of Volume III of the Scoping Report. However, Table 13-23 summarising matters to be scoped in or out does not include LLCAs. For avoidance of doubt, the ES should include an assessment of impacts to LLCAs, where significant effects are likely to occur. This may form part of the overall assessment to district level landscape character but it should be clear what effects are predicted at the more granular scale. To inform this assessment the ES should also include a description of the baseline character of the LLCAs. Evidence of any agreement reached with relevant consultation bodies as to the assessment approach should be included in the ES.
3.8.5	Table 13-23	Below ground pipeline in tunnel during operation	The Scoping Report states that there would be no changes to the landscape or visual baseline during operation from installation of pipeline within tunnel.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The Inspectorate agrees that this matter can be scoped out of further assessment on the basis explained in the Scoping Report, but the ES should confirm that no easements are required for maintenance of these pipeline sections that would affect above ground landscaping.
3.8.6	Table 13-23	Eastney LSO during construction and operation	The Scoping Report states that no works are anticipated to the Eastney LSO. Paragraph 3.1.5 states that Eastney LSO may not be subject to physical works but is an area over which the Applicant may need operational powers. Paragraph 3.2.2 states that the existing infrastructure would be used for release of reject water. The Inspectorate agrees that this matter can be scoped out of further assessment on the basis explained in the Scoping Report. This matter should be revisited if physical works are subsequently found to be required.
3.8.7	Table 13-23	Havant Thicket Reservoir during operation	The Scoping Report states that there would be no changes to the landscape or visual baseline during operation as the proposed works relate to the storage of recycled water. The Inspectorate agrees that this matter can be scoped out on the basis explained in the Scoping Report. This matter should be revisited if physical works are subsequently found to be required.
3.8.8	Table 13-23	Havant Borough townscape areas TCA 2b, 2c, 7d, 7e and 7g during operation	The Scoping Report states that there would be no changes to the landscape or visual baseline during operation as the tunnel shafts will be capped. The Inspectorate agrees that this matter can be scoped out on the basis explained in the Scoping Report, but the ES should confirm that no easements are required for maintenance of these pipeline sections that would affect above ground landscaping.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.9	Table 13-23	Motorists on the A27/ M27, B2177 and local road networks during construction and operation	The Scoping Report states that these are *"low sensitivity receptors with sequential views unlikely [to result in] significant effects."* No further explanation is presented as to the predicted change from baseline to support this assertion and the description of baseline conditions in the Scoping Report indicates that motorists on these roads would be able to see several components of the Proposed Development. The significance matrix at Table 13-21 indicates that a significant effect could be determined to low sensitivity receptors if there is a very high or high magnitude of impact. The Inspectorate does not have sufficient information to exclude the possibility of likely significant effects to these receptors. The ES should include an assessment or further evidence to demonstrate why significant effects are not likely, including agreement with relevant consultation bodies.
3.8.10	N/A	Other landscape character areas (LCAs)	The Inspectorate notes that there are some LCAs listed in Table 13-12 and shown on Figure 13.2 in Volume III of the Scoping Report that are not addressed in Table 13-23. For example, LCA 7h South East Hampshire Downs and LCA 10b Portsmouth harbour. It is unclear whether it is proposed to scope these LCAs in or out of assessment. The ES should include an assessment of impacts to all LCAs where significant effects are likely to occur, unless otherwise agreed with relevant consultees.

ID	Ref	Description	Inspectorate's comments
3.8.11	Paragraph 13.2.18	Guidance	The Inspectorate considers that Historic England's published setting advice, The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) (GPA3) is of

ID	Ref	Description	Inspectorate's comments
			relevance to the assessment of effects to the landscape setting of heritage assets. The Applicant should consider the production of dynamic and kinetic assessments that engage with movement through the landscape (not just fixed point views), including in relation to motorists (please refer to the Inspectorate's comments at ID 3.8.9 of this Scoping Opinion).
3.8.12	Table 13-11	Baseline data	In addition to the data sources listed, the description in the ES should also include reference to soils, water and historic landscape character where these features contribute towards the landscape character. This may be by cross-reference to information within other chapters of the ES as relevant to avoid duplication.
3.8.13	Paragraph 13.5.15 and Figure 13.4, Volume III Figures	Viewpoint locations	The Scoping Report states that 107 viewpoints have been defined to represent visual receptors. The viewpoint locations are shown on Figure 13.4 in Volume III of the Scoping Report. The ES should include evidence of any agreement or otherwise reached with the relevant planning authorities as to the final viewpoint selection.
3.8.14	Paragraph 13.6.3	Removal of trees with Tree Preservation Orders (TPOs), veteran or ancient trees or protected hedgerows	The Inspectorate considers that this would amount to a permanent change and should be assessed as such (not a temporary construction effect).
3.8.15	Paragraph 13.7.4	Assessment methodology SDNP	The Scoping Report states that the assessment methodology for setting impacts to the SDNP will be developed further in the ES in consultation with the South Downs National Park Authority (SDNPA). The ES should include evidence of any agreement reached with SDNPA about the assessment methodology and describe any matters that are outstanding. It should be clear how the assessment has taken account of the special qualities of the SDNP, including

ID	Ref	Description	Inspectorate's comments
			tranquillity. In this regard, the ES should also consider potential in-combination effects between landscape and noise and vibration.
3.8.16	Tables 13-3 and 13-7	Determining value attached to landscape and views	The ES should set out the justification used for assigning value and sensitivity to receptors where this has involved the application of professional judgment and provide evidence of any agreement reached with relevant consultation bodies. It should be clear how the value of individual elements such as trees, hedgerow and agricultural land has been considered within the determination of value.
3.8.17	Paragraph 13.7.37	Photomontages	The Scoping Report states photographs and photomontages will be prepared in accordance with Landscape Institute Technical Guidance Note 06/19 (TGN 06/19) and that some Type 4 photomontages will be prepared for selected viewpoints. The Inspectorate considers that effort should be made to agree the number and location of photomontages, including Type 4 photomontages, with relevant consultation bodies.
3.8.18	Paragraph 13.9.5	Ancient woodland	The Scoping Report states that loss of ancient woodland will be avoided wherever practicable in line with the National Policy Statement (NPS) for Water Resources Infrastructure (WRI). If the Proposed Development results in the loss or deterioration of irreplaceable habitats such as ancient woodland, the ES must provide details of the proposed compensation strategy and the wholly exceptional reasons for such loss.
3.8.19	Paragraph 13.9.6	Mitigation planting	The ES should set out what opportunities have been considered for advanced planting and confirm which are proposed to be taken forward and which have been discounted, together with the reasons. The ES should include a management plan for mitigation planting demonstrating how it will be maintained to ensure it reaches the

ID	Ref	Description	Inspectorate's comments
			extent and quality of mitigation assumed in the assessment of residual effects at Year 15 of operation of the Proposed Development.
3.8.20	Paragraph 13.9.7	Design objectives and principles	The Inspectorate welcomes the Applicant's commitment to providing plans that illustrate type, extent and function of mitigation for landscape and visual impacts. The Inspectorate considers that a clear benchmark should be established within the ES as the basis for implementation of design mitigation.
3.8.21	N/A	Hedgerow and tree surveys	The Inspectorate notes that the Proposed Development has the potential to affect existing hedgerows and trees during construction and operation. It is considered that surveys should be undertaken to establish the baseline condition for these landscape features. Effort should be made to agree the survey scope with relevant consultation bodies. The ES should include information about the outcomes of the surveys.
3.8.22	N/A	Seascape character	The Scoping Report makes limited reference to seascape character and the potential for impacts to it from the construction and operation of the Proposed Development. Whilst this may form part of the overall landscape assessment, the ES should set out any specific seascape guidance that has been used to inform the assessment and describe the baseline conditions of seascape character areas that could be affected.
3.8.23	N/A	Landscape features	It should be clear in the ES how the assessment has considered individual landscape features of relevance, eg woodlands, rivers, drainage, fields, roads and settlements.
3.8.24	Figure 13.2 in Volume III	Published landscape character assessment areas	The Inspectorate notes that the landscape character assessment areas shown on Figure 13.2 are not entirely consistent with those described in Tables 13-12 and 13-23 of Volume I of the Scoping Report, with many additional areas identified in these tables. For

ID	Ref	Description	Inspectorate's comments
			example, the Havant Borough townscape areas referenced in ID 3.8.8 of this Scoping Opinion are not annotated on Figure 13.2. Figures in the ES should include information about the location of all landscape and townscape character areas considered in the assessment and there should be consistency across documents forming part of the ES.

3.9 Noise & Vibration

(Scoping Report Volume I Main Report Chapter 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.1	Paragraphs 14.5.10 to 14.5.12 and Table 14-14	Indirect temporary or permanent road traffic vibration impacts during construction and operation	The Scoping Report proposes to scope this matter out on the basis that the vibration from heavy vehicles is caused by movement over irregularities and the highways authority has a duty to maintain the road network. The Applicant confirms that a commitment will be made in a construction traffic management plan (CTMP) to reinstate the road surface condition if it is damaged by the Proposed Development. This means there would be no pathway for impacts. In addition, the Scoping Report states that an increase in heavy goods vehicles (HGV) on roads with existing irregularities would not result in a change to the vibration emitted. The Inspectorate agrees that this matter can be scoped out on the basis set out in the Scoping Report. However, the ES should provide further details of the likely measures envisaged to mitigate effects and how these would be secured through the dDCO. Please refer to the Inspectorate's comments at ID 2.2.10 of this Scoping Opinion regarding management plans.
3.9.2	Paragraph 14.5.13	Noise and vibration from underground pipelines during operation	The Scoping Report states that the proposed pipeline will be buried and noise from the flow of water is considered unlikely to be perceptible at receptor locations. The use of industry good practice in the design of the pipeline will ensure smooth flow. Based on the information in the Scoping Report, the Inspectorate agrees that this matter can be scoped out of further assessment. The ES should confirm the industry good practice measures incorporated into the design of the pipeline.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.3	Paragraph 14.5.16	Noise and vibration from Havant Thicket Reservoir during operation	The Scoping Report states that the works associated with the Proposed Development at Havant Thicket Reservoir comprise only storage of recycled water and no plant. Based on the information in the Scoping Report, the Inspectorate agrees that this matter can be scoped out of further assessment
3.9.4	Table 14-14	Direct temporary noise and vibration during operation	The Scoping Report proposes to scope this matter as no temporary impacts will be generated during the operation phase. The Inspectorate does not have sufficient information about the possibility of any temporary noise and vibration that may occur during operation, for example through maintenance and renewal works. The ES should include an assessment or demonstrate that significant effects are not likely to occur with evidence of agreement from relevant consultation bodies.
3.9.5	Table 14-14	Indirect temporary road traffic noise during operation	The Scoping Report proposes to scope this matter out on the basis that no temporary road traffic noise impacts will be generated during the operation phase. Based on the information in the Scoping Report and noting that road traffic movements during operation are predicted to be circa 57 per day, the Inspectorate agrees that this matter can be scoped out of the ES.
3.9.6	Table 14-14	Direct permanent noise impacts during construction	The Scoping Report proposes to scope this matter out on the basis that no permanent impacts would occur during construction. Based on the information in the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.7	Paragraphs 14.5.14 and Table 14-14	Direct permanent vibration impacts during construction and operation (from AGP)	The Scoping Report proposes to scope this matter out on the basis that impacts during the construction phase would be temporary and that vibration levels at the AGP during operation would be controlled by standard design measures such as pump balancing and anti-vibration mounts. Based on the information in the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the ES. The ES should describe the sources of vibration and the predicted vibration level with these design measures implemented.
3.9.8	Paragraphs 14.5.15 and Table 14-14	Indirect permanent road traffic noise impacts during construction and operation	The Scoping Report proposes to scope this matter out on the basis that impacts during the construction phase would be temporary and, whilst there would be additional vehicle movement during operation for maintenance activities, it would be a low number of vehicles and the associated noise impacts would be negligible. Paragraph 14.5.15 of the Scoping Report provides an indication of the expected vehicle movements. Based on the information in the Scoping Report, the Inspectorate agrees that this matter can be scoped out of further assessment.

ID	Ref	Description	Inspectorate's comments
3.9.9	Paragraphs 14.4.4	Study area for direct construction impacts	The Inspectorate agrees that Eastney TT can be excluded on the basis that the Scoping Report confirms that no physical works are proposed at this existing infrastructure. The Inspectorate does not agree that Havant Thicket Reservoir can be excluded from the assessment scope as information in the Scoping Report indicates that physical construction works are proposed at the reservoir. Consideration should also be given to the potential for

ID	Ref	Description	Inspectorate's comments
			cumulative effects between the Proposed Development and Havant Thicket Reservoir as described at ID 2.1.6 and Table 3.14 of this Scoping Opinion. Accordingly, the ES should include an assessment of this matter or evidence of agreement with relevant consultees that this matter can be scoped out and an absence of LSE.
3.9.10	Paragraph 14.4.4	Study area for direct operational impacts	The ES should confirm the final study area used in the assessment and explain how it has been selected by reference to relevant guidance.
3.9.11	Paragraphs 14.6.4, 14.6.11 and 14.6.34	Baseline noise surveys	The Scoping Report proposes to undertake baseline noise surveys only at locations where construction noise effects would exceed one month and where there would be direct operational noise effects, ie noise from buildings and plant. It is stated that for other construction effects, baseline noise levels are not required in the assessment based on guidance in BS 5228-1. The Inspectorate considers that this approach as acceptable, subject to confirmation in the ES as to: ▪ how the assessment has allowed for any potential for construction works to overrun; ▪ how construction noise at public open space will be assessed, as paragraph 14.6.11 suggests that this will require baseline noise levels; and ▪ where likely significant effects from construction traffic noise are identified, baseline surveys should be completed or a justification as to why this is not required. Effort should be made to agree the survey approach with relevant consultation bodies.

ID	Ref	Description	Inspectorate's comments
3.9.12	Paragraph 14.7.2	Assumptions	The Scoping Report states that the assessment of construction impacts will be based on information provided by the early works contractor, and that depending on the level of detail, worst-case assumptions may have to be made. Where assumptions have been made, the ES should contain a statement with the rationale behind them.
3.9.13	N/A	Figures	The ES should include figures showing the location of receptors considered in the assessment.
3.9.14	N/A	Vibration baseline	The ES should explain the vibration baseline that has been used in the assessment, or otherwise confirm why a baseline is not required.

3.10 Resource & Waste Management

(Scoping Report Volume I Main Report Chapter 15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Paragraphs 15.6.6, 15.6.15, 15.6.17 to 15.6.18 and Tables 15-6, 15-7 and Table 15-15	Consumption of material resources associated with the Proposed Development during construction and operation	Regarding construction, Tables 15-6 and 15-7 of the Scoping Report set out the quantities of aggregates and manufactured materials consumption (respectively) at which the Applicant considers a likely significant effect would occur. On the basis that aggregate and manufactured material consumption does not exceed the quantities set out in Tables 15-6 and 15-7, the Inspectorate is content that a significant effect is unlikely. Consumption of material resources associated with the Proposed Development during construction can be scoped out of further assessment. Regarding operation, the Scoping Report proposes to scope this matter out on the basis that quantities of the materials required would be *"…negligible in relation to the supply chain capacity".* Having regard to the nature and characteristics of the operational Proposed Development, the Inspectorate is content that a significant effect is unlikely. Consumption of material resources associated with the Proposed Development during operation can be scoped out of the ES assessment. Please refer to the Inspectorate's comments at ID 2.1.16 of this Scoping Opinion regarding natural resources required.
3.10.2	Paragraphs 15.6.6 and 15.6.21 and Table 15-15	Impacts on MSAs and safeguarded minerals and waste infrastructure during operation	The Scoping Report identifies potential impacts on MSAs and safeguarded mineral and waste infrastructure sites that are present in the vicinity of the Proposed Development, including the risk that they could be sterilised. This matter has been scoped into the construction phase assessment (paragraphs 15.6.4 and 15.6.5). The Scoping

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			Report proposes to scope out an assessment of impacts during the operational phase, as this *"...would not result in any further effects".* Providing the ES assessment conclusions for areas that would be permanently sterilised clearly reflect the duration of impact, the Inspectorate is content with this approach and that a separate assessment of these matters for the operational phase is not required. Impacts on MSAs and safeguarded minerals and waste infrastructure during operation can be scoped out. The ES should clearly identify which MSAs and safeguarded mineral and waste infrastructure sites are to be temporarily impacted/ lost during construction and any which are to be permanently sterilised
3.10.3	Paragraphs 15.6.6, 15.6.19 to 15.6.20 and Table 15-15	Disposal of waste associated with the Proposed Development during operation	The Scoping Report proposes to scope out an assessment of waste generated during operation, stating that the quantities would be *"…negligible in relation to the regional generation of industrial and commercial waste".* Liquid discharges generated during operation of the proposed WRP would be assessed in the Water Environment Chapter of the ES. Having regard to the nature and characteristics of the operational Proposed Development, the Inspectorate is content with this approach. Impacts from waste generated during operation can be scoped out of assessments in the Resource and Waste Management ES Chapter. Please refer to the Inspectorate's comments at ID 2.1.17 of this Scoping Opinion regarding predicted volumes of waste.

ID	Ref	Description	Inspectorate's comments
3.10.4	Paragraphs 15.4.6 to 15.4.7	Waste study area	The Applicant's attention is drawn to the comments of Hampshire County Council (Appendix 2), which indicate that the information presented in the Scoping Report about management of inert waste may be inaccurate. The final study area selected as the basis of assessment should be informed by accurate data and effort should be made to agree the approach with relevant consultation bodies.
3.10.5	Section 15.5	Baseline conditions	The Applicant's attention is drawn to the comments of Hampshire County Council (Appendix 2), which identify information of relevance to the baseline in respect of additional safeguarded sites within the Hampshire Minerals and Waste Plan and data available in the Hampshire Local Aggregate Assessment. The Inspectorate considers that this information should be used to inform the baseline description in the ES.
3.10.6	Paragraphs 15.8.2 to 15.8.3	Management Plans	Please refer to the Inspectorate's comments at ID 2.2.10 of this Scoping Opinion regarding management plans.

3.11 Socio-economics, Tourism, Recreation and Health

(Scoping Report Volume I Main Report Chapter 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Paragraph 16.6.12	Impacts on tourism within the SDNP during construction	The Scoping Report proposes to scope out tourism effects on the SDNP as a whole during construction on the basis that no likely significant effects are anticipated at this stage given the limited area of impact relative to the approximately 1,600 square kilometre coverage of the SDNP and that individual strategic tourism receptors in affected areas of the SDNP will be assessed. Therefore, the Inspectorate agrees that impacts on tourism within the SDNP as whole during construction can be scoped out on the basis set out in the Scoping Report. However, the ES should include an assessment of impacts to all individual tourism receptors within the SDNP where significant effects are likely and explain how such effects would impact its purpose and Special Qualities. It should clearly identify individual receptors that could be affected and the rationale for inclusion or exclusion from the assessment. Efforts should be made to agree the approach with relevant consultation bodies.
3.11.2	Table 16-18	Impacts on tourism within the SDNP during operation	The Inspectorate agrees that operation of the Proposed Development is unlikely to result in significant effects on tourism in the SDNP and is content for this matter to be scoped out from further assessment.
3.11.3	Paragraph 16.6.13	The following specific health determinants: indoor environment, diet and other lifestyle choices, workplace conditions, housing and social or community influences	The Scoping Report states that these health determinants are not relevant to the Proposed Development. The Inspectorate agrees that the Proposed Development is not likely to result in significant effects on these health determinants and is content for them to be scoped out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		(such as racism or social exclusion) during construction	
3.11.4	Paragraph 16.6.14	Impacts to strategic tourism receptors during operation	The Scoping Report states that operation of the Proposed Development would not result in likely significant effects from disruption to strategic tourism receptors including changes in or loss of access. It is stated that any effects from maintenance activities would be minimal or temporary in nature. The Inspectorate does not have sufficient information about the likely maintenance activities, and the requirement for any easements, to exclude the possibility of effects to strategic tourism receptors. This matter should be assessed in the ES where significant effects are likely, or confirmation should be provided as to how maintenance activities will be managed to avoid impacts to open space and access.
3.11.5	Paragraph 16.6.14	Impacts on Walking, Cycling and Horseriding (WCH) provision, including Public Rights of Way (PRoWs) and open spaces during operation	The Scoping Report states that operation of the Proposed Development would not result in likely significant effects on the access to WCH provision and any effects arising from maintenance activities on PRoWs and open spaces would be minimal or temporary in nature. The Inspectorate's comments at ID 3.11.4 apply equally to this matter.
3.11.6	Paragraph 16.6.15	Effects on employment from impacts on allocated employment land during operation	The Scoping Report states that effects on employment from impacts on allocated employment land would be limited to the construction phase of the Proposed Development and would be assessed in the ES as permanent construction effects. The Inspectorate is content to scope out effects on employment from impacts on allocated employment land during operation from further assessment on the basis described in the Scoping Report provided

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			that the assessment of the construction phase includes consideration of the long-term impacts from loss of the employment land.
3.11.7	Paragraph 16.6.16	Health determinants: access to health, open space and nature, social care and other social infrastructure during operation	The Scoping Report proposes to scope out this matter on the basis that there would be no change to the access provision to health, open space and nature, social care and other social infrastructure during operation of the Proposed Development. The Inspectorate is content with this justification and agrees to scope this matter out from further assessment, subject to comments at ID 3.11.5 regarding access to open space.
3.11.8	Paragraph 16.6.16	Health determinants: access to work and training during operation	The Scoping Report states that during operation of the Proposed Development there would be few additional employment and training opportunities created, so the population level benefit would not be significant. On this basis, the Inspectorate is content for this matter to be scoped out of further assessment.
3.11.9	Paragraph 16.6.16	Health determinants: social cohesion effects during operation	The Inspectorate agrees that operation of the Proposed Development is unlikely to result in significant effects on social cohesion and is content for this matter to be scoped out from further assessment.
3.11.10	Paragraph 16.6.16 and Table 16-18	Health determinants: accessibility and travel during operation	The Scoping Report states that impacts would relate to permanent construction impacts that affect access and provision of PRoW. Construction impacts are proposed to be assessed in the ES. The Inspectorate agrees that this matter can be scoped out on the basis set out in the Scoping Report.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.11	Table 16-18	Impacts on tourist accommodation during operation	The Inspectorate agrees significant effects on tourist accommodation is unlikely during operation of the Proposed Development and is content for this matter to be scoped out from further assessment.

ID	Ref	Description	Inspectorate's comments
3.11.12	Section 16.5	Baseline conditions	The Applicant's attention is drawn to the comments of United Kingdom Health and Security Agency (UKHSA) and Hampshire County Council (Appendix 2 of this Scoping Opinion) regarding the availability of baseline data from Joint Strategic Needs Assessment (JSNA). The ES should include relevant data from these documents.
3.11.13	N/A	Strategic tourism receptors	The ES should provide a clear definition of strategic tourism receptors and clearly set out which receptors may be affected by all phases of the Proposed Development.
3.11.14	N/A	Baseline information for PRoWs, cycleways and bridleways	The Inspectorate notes from paragraph 17.7.9 of the Scoping Report that Strava analysis will be used to ascertain existing usage of PRoWs. The ES should explain how existing usage of cycleways and bridleways have been ascertained and identify any limitations in the use of Strava analysis and how these have been bridged in the assessment. Effort should be made to agree any requirement for baseline surveys with relevant consultation bodies.

3.12 Traffic & Transport

(Scoping Report Volume I Main Report Chapter 17)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.12.1	Paragraph 17.6.9 and Table 17-8	Traffic impacts during operation including: ▪ Delay (driver) ▪ Delay (bus passenger) ▪ Accidents and safety ▪ Severance	The Scoping Report proposes to scope these matters out on the basis that traffic flows on the local road network would not exceed the thresholds in the Institute of Environmental Assessment (1993) Guidelines for the Environmental Assessment of Road Traffic (GEART). It is indicated that there would be circa 57 additional vehicles per day on the local road network. The Inspectorate agrees that this matter can be scoped out of the ES on the basis set out in the Scoping Report. The ES should confirm the predicted daily traffic movements during operation for all vehicle types.
3.12.2	Paragraph 17.6.8 to 17.6.9 and Table 17-8	Hazardous loads during construction and operation	The Scoping Report states that this matter can be scoped out on the basis that there will be no hazardous loads required during construction and the number of hazardous loads required during operation of the Proposed Development is not considered to be significant according to GEART. The Inspectorate agrees that since no hazardous loads are required during construction, this matter can be scoped out of the ES. The Inspectorate does not agree that this matter can be scoped out for operation. The ES should include an estimate of the number and composition of any hazardous loads. The ES should include an assessment of any likely significant effects or demonstrate why these are not likely with agreement from relevant consultation bodies. Please note the Inspectorate's comments at ID 3.12.5 of this Scoping Opinion regarding GEART.

ID	Ref	Description	Inspectorate's comments
3.12.3	Table 17-2	Strava heat maps	The Scoping Report states that Strava heat maps will be used as a data source to understand the usage of routes by non-motorised users. The ES should explain why this is a robust data source for establishing baseline conditions. Please refer to the Inspectorate's comments at ID 3.11.14 of this Scoping Opinion. The Applicant's attention is also drawn to the comments from Havant Borough Council in Appendix 2 of this Opinion.
3.12.4	Section 17.5	Baseline conditions	The Applicant's attention is drawn to the comments of Hampshire County Council regarding the description of the existing road network and presence of national cycle network (NCN) route 22. The baseline description in the ES should provide an accurate representation of the baseline conditions.
3.12.5	Paragraph 17.2.4	Guidance	The Scoping Report refers to Institute of Environmental Assessment guidance titled Guidelines for the Environmental Assessment of Road Traffic (1993). The Inspectorate notes that this guidance was replaced by new IEMA guidance titled Environmental Assessment of Traffic and Movement in July 2023.
3.12.6	Paragraph 17.3.6	Shipping of materials	The Applicant states that, although the delivery of materials is currently anticipated to be by road, there is a scenario where delivery via sea may be required. If deliveries by sea are proposed, the ES should provide details including frequency, anticipated routes and assess any related impacts where significant effects are likely to occur.
3.12.7	Paragraph 17.7.5	Modelling methodology	For the avoidance of doubt, the ES should contain a clear and full description of the methodology for any modelling used within the

ID	Ref	Description	Inspectorate's comments
			assessment. This should include the software and data sources used and any assumptions or limitations.
3.12.8	Paragraph 17.7.41	Abnormal indivisible loads (AIL)	The ES should include a description of the expected number of AILs and the proposed routeing. Any mitigation measures required to facilitate the delivery of AILs should be detailed in the ES and any resultant likely significant effects assessed.

3.13 Water Environment

(Scoping Report Volume I Main Report Chapter 18)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13.1	Paragraph 18.6.24	Direct disturbance of surface and groundwaters during operation	The Scoping Report proposes to scope this matter out on the basis that activities associated with the operation of the Proposed Development would not result in direct disturbance of surface water or groundwater bodies and that any routine intrusive maintenance work would be small scale and localised. The Scoping Report does not consider potential events such as a burst or breakage to the pipeline and leakage during operation on surface water bodies. The ES should provide an assessment of these matters where there is potential for likely significant effects to occur or demonstrate the absence of a likely significant effect with agreement from relevant consultation bodies. The Inspectorate agrees that given the spatial extent and limited duration of likely future maintenance activities, significant effects are unlikely to occur to groundwaters and is content to scope this matter out of further assessment.
3.13.2	Paragraph 18.6.25	Increased sediment supply during operation	The Scoping Report proposes to scope this matter out on the basis that routine or unplanned maintenance work which could result in increased sediment supply would be infrequent and limited to discrete areas of the Proposed Development. In addition, it is stated that best practice mitigation measures for preventing and limiting soil erosion and turbid runoff would be in place. The Inspectorate agrees to scope this matter out of the ES based on information in the Scoping Report. The ES should include a

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			description of the best practice mitigation measures proposed and confirm how these would be secured in the DCO.
3.13.3	Paragraph 18.6.26	Changes to groundwater flow during operation	The Scoping Report proposes to scope this matter out on the basis that changes to groundwater flows would be assessed as part of the construction phase assessments and that, once constructed, the underground infrastructure will not have any further likely significant effects on groundwater flows to those assessed during the construction phase. The Inspectorate is content to scope this matter out of further assessment on the basis set out in the Scoping Report provided that the construction phase assessment considers the long-term impacts of the infrastructure installed on subsurface flow patterns and volumes including through areas of sensitive geological faulting and spring flow.
3.13.4	Table 18-9	Havant Thicket Reservoir and receiving watercourses water quality during construction	The Scoping Report proposes to scope this matter out on the basis that no water would be present in the reservoir during construction resulting in no pathway for impact. Given the lack of impact pathway during construction, the Inspectorate agrees to scope this matter out of further assessment.
3.13.5	Table 18-9	Coastal water quality during construction	The Applicant proposes to scope this matter out on the basis that there are no activities directly within transitional or coastal water bodies during construction. The Inspectorate agrees to scope this matter out on the basis set out in the Scoping Report. This matter should be revisited if the scope of construction activity changes.

ID	Ref	Description	Inspectorate's comments
3.13.6	Table 18-4	Drainage strategy	The Scoping Report states that a drainage strategy will be developed for the Proposed Development. The Applicant should provide a draft/outline version of the drainage strategy and demonstrate how this will be secured through the dDCO or other legal mechanism. Potential construction phase impacts should also be addressed in the drainage strategy.
3.13.7	Paragraph 18.5.14, 18.5.37, 18.5.69 and 18.5.84	Flood Zones	The Scoping Report identifies Flood Zones across the study area however does not include sub-categories, such as an area of high probability (Flood Zone 3a) or functional floodplain (Flood Zone 3b). The ES should provide an accurate and consistent description of the baseline flood risk for each element of the Proposed Development and the description should clearly distinguish between Flood Zones, including Flood Zones 3a and 3b where relevant.
3.13.8	Paragraph 18.7.15 and Table 18-7	Sensitivity of receptors	The Scoping Report states that the assessment methodology for groundwater will adopt the methodology set out in the Design Manual for Roads and Bridges (DMRB) standard LA 113 Road drainage and water environment. Table 18-7 of the Scoping Report provides definitions of sensitivity for the purposes of water receptors and flood risk. Table 18-7 does not include a 'Very High' category of receptor sensitivity commonly used when applying an approach informed by the DMRB. Deviation from this approach has potential to undervalue or underestimate the significance of effect. Where the assessment deviates from established guidance, the Applicant should ensure that this is clearly stated and suitably justified in the ES. The Applicant should seek agreement with the relevant consultation bodies regarding the methodology used in the assessment and evidence this in the ES.
3.13.9	Paragraph 18.8.6	Three-dimensional modelling	The Scoping report states that due to the complexities of the hydrogeological regime, it is considered that the Proposed

ID	Ref	Description	Inspectorate's comments
			Development cannot be sufficiently defined in a full scale three-dimensional model to accurately represent the processes occurring and how they may be affected by the Proposed Development. It is proposed to use analytical and two-dimensional conceptual models to inform the assessment. The Inspectorate considers that efforts should be made to agree the modelling approach with relevant consultation bodies. Modelling should be sufficient to inform a robust assessment of likely significant effects in the ES.
3.13.10	18.7.13	Nutrient levels	The Scoping Report identifies a number of nature conservation sites which have been classified as failing condition due to elevated nutrient levels and for which nutrient neutrality is required to be demonstrated to enable development. The ES should take account of any solutions for nutrient neutrality of Diffuse Water Pollution Plans currently being developed or mitigated. The Applicant's attention is drawn to Natural England's comments (Appendix 2 of this Scoping Opinion).
3.13.11	N/A	Existing flood defences	The Applicant's attention is drawn to Havant Borough Council and East Hampshire District Council's comments about existing sea defences reaching the end of their serviceable life. The assessment of flood risk for the WRP should include consideration of any potential future change in risk from sea level rise including the implications arising from a change to existing defences.

3.14 Cumulative Effects Assessment

(Scoping Report Volume I Main Report Chapter 19)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.14.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
3.14.2	19.3.10	Cumulative effects assessment methodology	The Scoping Report identifies the proposed search parameters for cumulative projects. In addition to the parameters listed, the following projects should also be considered (as relevant) in the ES: ▪ Planning permissions and DCOs that are older than 5 years if there is evidence that these could have been subject to a longer implementation period or are multi-phase projects where later construction phases could coincidence with the Proposed Development. ▪ NSIPs and planning applications that are subject to adopted scoping opinions. ▪ Refused planning application that are subject to appeal procedures not yet determined.
3.14.3	19.3.16	Assessment of other existing development and/ or approved development	The Scoping Report states that an assessment of all shortlisted tier 1 and 2 projects will be provided where possible, and all shortlisted tier 3 projects where possible, although this may be qualitative and at a very high level. The Inspectorate considers that any likely significant cumulative effects arising from the Proposed Development and shortlisted tier 1,

ID	Ref	Description	Inspectorate's comments
			2 and 3 projects should be provided in the ES. Any gaps and/ or uncertainty in the assessment should be explained.
3.14.4	Section 19.6	Assessment of in-combination effects	The Scoping Report states that significant in-combination effects will be reported in the relevant aspect chapters of the ES. The Inspectorate agrees with this approach subject to the ES clearly setting out the methodology used for the assessment, the impact pathways considered and the significant effects arising from in-combination effects (as distinguished from other aspect effects) together with any additional mitigation required to address them.
3.14.5	N/A	Cut-off date for assessment	The ES should state any cut-off date that has been used in respect of identifying cumulative projects for the assessment and explain why this date has been selected, and any steps proposed to update the assessment during any examination.
3.14.6	N/A	Phasing	The Scoping Report (eg paragraph 1.5.4) states that the Proposed Development is likely to be delivered in two phases, with an initial phase of approximately 20 Ml/d increasing through the second phase to 60 Ml/d of recycled water. The ES should include an assessment of any likely significant cumulative and in-combination effects that would arise from a phased approach, using the worst case phasing scenario that would be allowed under the DCO.
3.14.7	N/A	Location plan	The ES should include figure(s) showing the location of longlisted and shortlisted projects for the assessment of cumulative effects.
3.14.8	N/A	Related/ consequential development	The ES should assess any likely significant cumulative effects arising from the Proposed Development and other development which is related or consequential to it, but which is proposed to be consented or delivered separately. This includes development which may be

ID	Ref	Description	Inspectorate's comments
			subject to permitted development rights. The ES should clearly distinguish between Proposed Development for which development consent is sought and any other development. Please refer to the Inspectorate's comments at ID 2.1.6 of this Scoping Opinion about expected works at existing infrastructure sites required to facilitate the Proposed Development.

3.15 Topics Scoped Out

(Scoping Report Volume I Main Report Chapter 20)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.15.1	Section 20.2 and Volume II Appendix 20-1, paragraph 1.6.3	Major accidents and disasters – Control of Major Accidents and Hazards (COMAH) sites	The Scoping Report seeks to scope this matter out on the basis that no COMAH sites have been identified within 4.8km of the Proposed Development (using the Health and Safety Executive's (HSE) mapping) and that the Proposed Development would not be a COMAH site or a Hazardous Substances Consent (HSC) site. Based on the reasoning and evidence presented in the Scoping Report, the Inspectorate is content that risks to or from the Proposed Development from this matter is not likely to result in significant effects and can be scoped out of the assessment.
3.15.2	Section 20.2 and Volume II Appendix 20-1, paragraph 1.7.7	Major accidents and disasters during decommissioning	Please refer to the Inspectorate's comments at ID 2.2.1 of this Scoping Opinion. For matters that the Inspectorate has not agreed to scope out in respect of risk of major accidents and disasters, the ES should also include an assessment of the decommissioning phase where significant effects are likely to occur.
3.15.3	Section 20.2 and Volume II Appendix 20-1, Section 1.3 and paragraph 1.8.1	Major accidents and disasters – activities within the scope of other health and safety legislation	The Inspectorate is content that there is other legislation through which potential health and safety impacts arising from health and safety at work and construction design and management would be controlled. The ES should identify any requirements of other regulatory regimes including relevant legislation and any permits or licences, together with any progress made towards securing these where they may impact on the effectiveness or delivery of avoidance or mitigation measures.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.15.4	Section 20.2 and Volume II Appendix 20-1, Annex A	Major accidents and disasters during construction and operation – widespread electricity failure, system failures and attacks	Based on the reasoning and evidence presented in the Scoping Report, the Inspectorate is content that risks to or from the Proposed Development from these matters during construction and operation are not likely to result in significant effects provided that they are adequately managed through the mitigation measures identified. The Inspectorate's comments at ID 2.2.10 of this Scoping Opinion regarding submission of outline or draft management plans with the DCO application are of relevance to these matters. On that basis, these matters can be scoped out of the assessment.
3.15.5	Section 20.2 and Volume II Appendix 20-1, Annex A	Major accidents and disasters during construction and operation – fire	The Applicant's attention is drawn to Havant Borough Council and East Hampshire District Council's comments (Appendix 2) in respect of fire risks arising from development at a former landfill site, which could result in major accidents and disasters. The Inspectorate does not have sufficient information to exclude likely significant effects from such a risk. The ES should include an assessment of this matter or demonstrate why significant effects are not likely to occur with agreement from relevant consultation bodies. Any mitigation required should be explained within the ES. The Inspectorate's comments at ID 2.2.10 of this Scoping Opinion regarding submission of outline or draft management plans with the DCO application are of relevance to these matters.
3.15.6	Section 20.2 and Volume II Appendix 20-1, Annex A	Major accidents and disasters during construction and operation – explosion from unexploded ordnance (UXO) and nuclear explosion	The Scoping Report explains that a UXO risk check has been undertaken, which *"identifies that the land area is classed as low risk for UXO with the marine area classed as moderate risk."* It is stated that a risk check would be undertaken to cover the entire Proposed Development and included within future stages of the EIA. It is unclear whether this means prior to DCO application submission or at a later stage. A management plan with mitigation measures is also proposed. No information is provided about what the risk check

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			comprises or the geographic extent of coverage. The Proposed Development is also located within a 5km buffer of a nuclear submarine port but no information is provided about any potential impact pathways or mitigation that might be required. The Inspectorate does not consider that sufficient evidence has been provided to scope this matter out of the assessment. The ES should include baseline information about UXO risk for the study area, which is sufficient to identify any likely significant effects arising from construction of the Proposed Development and the mitigation required to address such effects. The ES should identify potential impact pathways to and from the nuclear site and any mitigation required to address such effects based on relevant guidance from the relevant local authority and/ or Office of Nuclear Regulation. The ES should describe how any mitigation required would be secured. The ES should include an assessment unless there is evidence of an absence of likely significant effects and agreement with relevant consultation bodies.
3.15.7	Section 20.2 and Volume II Appendix 20-1, Annex A	Major accidents and disasters during construction and operation – bird strike	The Scoping Report identifies a risk arising from the introduction of lagoons as part of the Proposed Development, which could result in an increase in bird numbers flying into the flight path of Southampton Airport. It seeks to scope this matter out on the basis that a risk assessment would be completed to identify the potential for significant effects and measures recommended to reduce risk. The Inspectorate does not consider that sufficient evidence has been provided to scope this matter out of the assessment in the absence of the bird strike risk assessment. This matter should be assessed in the ES where the risk assessment concludes that there are potential likely significant effects. The risk assessment should be appended to the ES and the ES should describe how any mitigation would be secured.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.15.8	Section 20.2 and Volume II Appendix 20-1, Annex A	Major accidents and disasters during operation – industrial accidents and pollution, including flooding from high pressure water pipe leak	The Scoping Report seeks to scope out impacts from industrial accidents, including those arising from the transport and storage of hazardous chemicals and rupture of high pressure pipelines. The Inspectorate does not have sufficient information to exclude the possibility of likely significant effects from a risk of major accidents and disasters arising from industrial accidents and pollution. The ES should include an assessment of these matters, which should be informed by the conclusions of the further risk assessments and studies referenced in Annex A, Appendix 20-1 of Volume II of the Scoping Report. Any mitigation required should be explained within the ES. The Inspectorate's comments at ID 2.2.10 of this Scoping Opinion regarding submission of outline or draft management plans with the DCO application are of relevance to these matters. Where reference is made to Southern Water documents in respect of measures, the documents or relevant extracts of them should be appended to the ES and it should be explained how these relate to other recognised industry guidance or standards.
3.15.9	Section 20.2 and Volume II Appendix 20-1, Annex A	Major accidents and disasters during construction and operation – matters addressed within other ES aspect chapters	The Scoping Report proposes to scope out assessment of the following risk events on the basis that they will not lead to a major accident and/ or disaster, and would be assessed in other ES aspect chapters: ▪ flooding (during construction); ▪ severe weather (during construction and operation); ▪ air quality (dust during construction); ▪ transport accidents (during construction and operation, aside from hazardous loads, which are considered at ID 13.15.8 in terms of industrial accidents); and

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			▪ pollution incidents (during construction). In several instances, the Scoping Report states that risks associated with these events would be mitigated by completion of further risk assessment together with implementation of management plans and control measures. The Inspectorate is content with the proposed approach subject to our comments in ID 2.2.10 of this Scoping Opinion regarding submission of outline or draft management plans as part of the DCO application. Regarding flooding, the ES should provide further detail of how the risk identification exercise in Annex A of Appendix 20-1, Volume II of the Scoping Report has considered the potential for major accidents or disasters arising from interaction of the Proposed Development with Havant Thicket Reservoir, including any additional considerations under the Reservoirs Act 1975 (as identified in paragraph 3.10.2 of the NPS for Water Resources Infrastructure).
3.15.10	Section 20.2 and Volume II Appendix 20-1, Annex A	Major accidents and disasters during operation – air quality and system failures	Based on the reasoning and evidence presented in the Scoping Report, the Inspectorate is content that risks to or from the Proposed Development from these matters are not likely to result in significant effects. These matters can be scoped out of the assessment.
3.15.11	Section 20.3	Shipping and navigation	Based on the information presented in the Scoping Report, ie that there are no direct works in the marine aquatic environment, the Inspectorate agrees that there are no impact pathways to shipping and navigation in the marine aquatic environment during operation and decommissioning of the Proposed Development. These matters can be scoped out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The Inspectorate notes potential for materials to be delivered by marine vessel during construction and, if used, this would be via existing port procedures. Chapter 15 of the Scoping Report indicates that some materials may be sourced from global markets; a predicted volume is not provided but Table 15-15 states that the quantities required are negligible in relation to supply chain capacity. On this basis, the Inspectorate considers that it is unlikely there would be a significant effect on shipping and navigation during construction. However, if deliveries are proposed via ports, the ES should describe the expected type and volume of materials, together with evidence that these can be handled via existing port procedures. If there are changes to the Proposed Development which result in works being proposed within the marine aquatic environment, this matter should be revisited. The ES should include an assessment of any likely significant effects to shipping and navigation arising from such works or otherwise explain why significant effects would not occur, together with evidence of agreement to the approach from relevant consultation bodies.
3.15.12	Section 20.4	Coastal and marine processes	Based on the information presented in the Scoping Report, which states that there are no works proposed with a direct connection to the marine aquatic environment and that effects from changes to discharge volumes and concentrations from the existing Eastney LSO would be considered as part of the marine biodiversity and water environment assessments (as described at Tables 3.4 and 3.13 of this Scoping Opinion) the Inspectorate agrees that assessment of effects to coastal and marine processes can be scoped out of the ES as a separate matter. If there are changes to the Proposed Development which result in works being proposed within the marine aquatic environment, this

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			matter should be revisited. The ES should include an assessment of any likely significant effects to coastal and marine processes arising from such works or otherwise explain why significant effects would not occur, together with evidence of agreement to the approach from relevant consultation bodies.
3.15.13	Section 20.5	Other marine users	The Inspectorate's comments at ID 3.15.2 of this Scoping Opinion also apply to other marine users.
3.15.14	Section 20.6	Heat and radiation	The Scoping Report states that as the Proposed Development is a water transfer and water recycling project, it would not generate any emissions of heat and/ or radiation that could result in significant effects. It is therefore proposed to scope these matters out of the ES. The Inspectorate has considered the nature and characteristics of the Proposed Development and agrees that heat and radiation can be scoped out of the ES.

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES[2]

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Health and Safety Executive	Health and Safety Executive
The National Health Service Commissioning Board	NHS England
The relevant Integrated Care Board	NHS Hampshire and Isle of Wight Integrated Care Board
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England
The relevant fire and rescue authority	Hampshire and Isle of Wight Fire and Rescue Service
The relevant police and crime commissioner	Hampshire Police and Crime Commissioner
The relevant parish council(s) or, where the application relates to land [in] Wales or Scotland, the relevant community council	Fair Oak and Horton Heath Parish Council
	Bishopstoke Parish Council
	Rowlands Castle Parish Council
	Southwick and Widley Parish Council
	Owlesbury Parish Council
	Curdridge Parish Council
	Wickham and Knowle Parish Council
	Shedfield Parish Council
	Boarhunt Parish Council
	Bishops Waltham Parish Council

[2] Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations')

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Upham Parish Council
	Compton and Shawford Parish Council
	Durley Parish Council
	Otterbourne Parish Council
	Colden Common Parish Council
The Environment Agency	The Environment Agency
The Maritime and Coastguard Agency	Maritime & Coastguard Agency
The Marine Management Organisation	Marine Management Organisation (MMO)
The Civil Aviation Authority	Civil Aviation Authority
The Relevant Highways Authority	Hampshire County Council
	Portsmouth City Council
The relevant strategic highways company	National Highways
Trinity House	Trinity House
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency

TABLE A2: RELEVANT STATUTORY UNDERTAKERS[3]

STATUTORY UNDERTAKER	ORGANISATION
The Crown Estate Commissioners	The Crown Estate
The Forestry Commission	South and East London Forestry Commission
The Office for Nuclear Regulation (the ONR)	The Office for Nuclear Regulation (the ONR)

[3] 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
The relevant Integrated Care Board	NHS Hampshire and Isle of Wight Integrated Care Board
The National Health Service Commissioning Board	NHS England
The relevant NHS Foundation Trust	South Central Ambulance Service NHS Foundation Trust
Railways	Network Rail Infrastructure Ltd
	National Highways Historical Railways Estate
Dock and Harbour authority	Langstone Harbour Board
	Portsmouth International Port
	ABP Southampton
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	The Environment Agency
The relevant water and sewage undertaker	Portsmouth Water
	Southern Water
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	Wales and West Utilities Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd

STATUTORY UNDERTAKER	ORGANISATION
	ESP Connections Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Last Mile Gas Ltd
	Leep Gas Networks Limited
	Mua Gas Limited
	Quadrant Pipelines Limited
	Squire Energy Limited
	National Gas
The relevant electricity distributor with CPO Powers	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Harlaxton Energy Networks Limited
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited

STATUTORY UNDERTAKER	ORGANISATION
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
	Southern Electric Power Distribution Plc
	Squire Energy Metering Ltd
	Utility Assets Limited
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc
	National Grid Electricity System Operation Limited
The relevant electricity interconnector with CPO Powers	Aquind Limited
	National Grid IFA 2 Limited

TABLE A3: SECTION 43 LOCAL AUTHORITIES (FOR THE PURPOSES OF SECTION 42(1)(B))[4]

LOCAL AUTHORITY[5]
Basingstoke and Deane Borough Council
New Forest District Council
Eastleigh Borough Council
Winchester City Council
Hart District Council
Gosport Borough Council
Fareham Borough Council
Havant Borough Council

4 Sections 43 and 42(B) of the PA2008

5 As defined in Section 43(3) of the PA2008

LOCAL AUTHORITY[5]
Waverley Borough Council
Chichester District Council
East Hampshire District Council
Test Valley Borough Council
South Downs National Park Authority
Portsmouth City Council
Southampton City Council
Hampshire County Council
New Forest National Park Authority
Dorset Council
Wokingham Borough Council
Wiltshire Council
West Berkshire Council
Bournemouth, Christchurch and Poole Council
Bracknell Forest Council
Surrey County Council
West Sussex County Council

TABLE A3: NON-PRESCRIBED CONSULTATION BODIES

ORGANISATION
Royal National Lifeboat Institution

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Basingstoke and Deane Borough Council
Boarhunt Parish Council
Eastleigh Borough Council
Environment Agency
Fareham Borough Council
Forestry Commission
Hampshire County Council
Havant Borough Council (submitted on behalf of East Hampshire District Council and Havant Borough Council)
Historic England
Marine and Coastguard Agency
Marine Management Organisation
National Gas
National Grid Electricity Transmission plc
NATS En-route Safeguarding
Natural England
New Forest District Council
Northern Gas Networks Limited
Otterbourne Parish Council
Portsmouth City Council
Portsmouth Water
Rowlands Castle Parish Council
Royal Mail

South Downs National Park Authority
Surrey County Council
Trinity House
UK Health and Security Agency
Waverley Borough Council
Winchester City Council

Basingstoke and Deane Borough Council
Civic Offices, London Road,
Basingstoke, Hampshire RG21 4AH
www.basingstoke.gov.uk | 01256 844844
customer.service@basingstoke.gov.uk
Follow us on @BasingstokeGov

Ms L Feekins-Bate
Via Email
hampshirewaterproject@planninginspectorate.gov.uk

Our Ref: 23/01855/EN10 15 August 2023
Your Ref: WA010002-000010-230725

Dear Ms Feekins-Bate,

Location: **Sites Throughout Hampshire**
Proposal: **Hampshire Water Transfer and Water Recycling Project - EIA Scoping Notification and Consultation**
Applicant **Southern Water Services Limited**

Thank you for your consultation letter dated 25 July 2023.

The Applicant has asked the Planning Inspectorate on behalf of the Secretary of State for its opinion (a Scoping Opinion) as to the information to be provided in an Environmental Statement (ES) relating to the Proposed Development.

The Planning Inspectorate has identified Basingstoke and Deane Borough Council (BDBC) as a consultation body which must be consulted before adopting its Scoping Opinion. BDBC have the following comment to make;

Any Environmental Statement will have to consider

- The impact of any existing / proposed abstraction on headwaters of both Itchen and Test which are within Basingstoke and Deane Borough Council boundary.
- The movement of water from one catchment to another and if that is suitable due to chemistry and biology of the water removed on the environment it is deposited in.

The physical works proposed will have a significant impact over and underground, but the scope of that impact is unlikely to be material in BDBC due to distance. However, the existing / proposed abstraction from the Rivers Test and Itchen does have a potential environmental impact on BDBC and needs to be fully considered within the scope of the Environmental Statement.

If you have any queries or require further information, please do not hesitate to contact Patricia Logie on [redacted] or email [redacted]@basingstoke.gov.uk

Yours sincerely

[redacted]

Mike Townsend
Planning and Development Manager

Feekins-Bate, Laura

From: Clerk Boarhunt Parish Council <clerk@boarhuntparishcouncil.gov.uk>
Sent: 08 August 2023 12:16
To: Hampshire Water Project
Subject: RE: WA010002 - Hampshire Water Transfer and Water Recycling Project - EIA Scoping Notification and Consultation

Boarhunt Parish Council comment as follows:-

"Concern to the effects on Biodiversity and damage to farm and woodland. The Parish Council ask for written confirmation that there is a managed plan in place to protect and enhance wildlife and due consideration is given to ensure that there is minimal affect to farm and woodland."

Yvonne
Clerk and Proper Officer to Boarhunt Parish Council
Tel: [redacted]
Clerk to Boarhunt Parish Council www.boarhuntparishcouncil.gov.uk

Please note that I work from home on a ten hour flexible basis and will respond to communications throughout the week.

From: Hampshire Water Project <HampshireWaterProject@planninginspectorate.gov.uk>
Sent: Tuesday, July 25, 2023 11:08 AM
Cc: Hampshire Water Project <HampshireWaterProject@planninginspectorate.gov.uk>
Subject: WA010002 - Hampshire Water Transfer and Water Recycling Project - EIA Scoping Notification and Consultation

Dear Sir / Madam

Please see attached correspondence on the proposed Hampshire Water Transfer and Water Recycling project.

Please note that the deadline for consultation responses is **22 August 2023**, and is a statutory requirement that cannot be extended.

Kind regards
Laura

The Planning Inspectorate

Laura Feekins-Bate
Senior EIA Advisor
The Planning Inspectorate

Please view our Information Charter before sending information to the Planning Inspectorate.
Our Customer Privacy Notice sets out how we handle personal data in accordance with the law.

Please take a moment to review the **Planning Inspectorate's Privacy Notice** which can be accessed by clicking this link.

Marie Shoesmith
Senior EIA Adviser
The Planning Inspectorate

Via email:

hampshirewaterproject@planninginspectorate.gov.uk

Application CS/23/95815
Please ask for Liz Harrison
Direct dial [redacted]
Working hours
Email [redacted]@eastleigh.gov.uk

Tuesday 22 August 2023

Dear Sirs

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by Southern Water Services Limited (the Applicant) for an Order granting Development Consent for the Hampshire Water Transfer and Water Recycling Project (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

Thank you for the consultation on the Environmental Impact Assessment (EIA) Scoping Report for the above proposal.

Due to the timing of the submission over the holiday period it has not been possible to put together a detailed response. However, it is considered that the overall approach proposed in the Soping Report is acceptable subject to the following points:

Incorrect references:

- Table 8-1 (paragraph 8.2.4) lists the Council's "Securing our Natural Environment Biodiversity Strategy 2022-2032" as a relevant local policy but it should be noted that this is a draft document that has been significantly revised and has not been through consultation or been adopted and therefore does not have any policy weight at present.
- The reference in Table 11-1 (paragraph 11.2.4) to "Policy 35 – ES Contaminated Land" as the relevant policy for EBC needs to be of the amended as the policy numbering refers to the previous local plan, despite being listed under the Eastleigh Borough Local Plan 2016-2036. The relevant policy is DM8 "Pollution", as referred to elsewhere in the report.
- The reference in paragraph 12.5.9 to policy S5 of the Emerging Eastleigh Local Plan is out of date as the adopted Eastleigh Borough Local Plan 2016-

2036 does not allocate land north of Bishopstoke and Fair Oak and adopted policy S5 relates to new development in the countryside.

- The reference in Table 13-9 (paragraph 13.2.17) to EBC policies G2, G3, G4, G6, G7, G8, G16 is incorrect as these are not policies within the Eastleigh Borough Local Plan 2016-2036.
- The reference in Table 15-1 (paragraph 15.2.2) to EBC policy S7 “New development in the countryside” is incorrect as in the adopted Eastleigh Borough Local Plan 2016-2036 policy S7 relates to the coast and policy S5 relates to new development in the countryside.

Detailed points:

- The submission suggests that professional judgement can be used to assess scoping distance for impacts on hydrologically linked sites (i.e. River Itchen). This should be amended to say it will be done in close liaison with the relevant bodies and site specific specialists.
- In areas important for bats, severing hedgerows could potentially impact populations further than 2km (i.e. populations associated with large areas of ancient woodland). Again, specialist local advice should be sought in these instances.
- It is agreed that the southern damselfly should be considered an important potential receptor.
- It should be clarified how the Biodiversity Net Gain requirements and proposals link with those of the Ecological Impact Assessment.

The Council reserves the right to provide more detailed comments once the application is formally submitted for consideration.

Yours faithfully

Andy Grandfield
Service Director for Planning and Environment

creating a better place

Environment Agency

Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Our ref: HA/2023/125265/01-L01
Your ref: WA010002-000010-230725

Date: 18 August 2023

Dear Sir/Madam

SCOPING OPINION – REQUEST AS TO INFORMATION TO BE PROVIDED IN AN ENVIRONMENTAL STATEMENT (ES) RELATING TO THE HAMPSHIRE WATER TRANSFER AND WATER RECYCLING PROJECT.

Thank you for consulting the Environment Agency on the above Environmental Impact Assessment (EIA) Scoping Opinion which we received on 25 July 2023. Our comments are set out below.

Introduction

We have reviewed the EIA Scoping Report (208102-ARU-EGN-XX-RP-L-00001) and its associated appendices.

Overall, we are generally pleased with the scope of the report and the range of topics that have been proposed to be included within the Environmental Statement (ES). However, we do feel that there is more work required with some elements that also need to be included within the forthcoming ES to ensure adequate assessment and potential mitigation and remediation is provided for the scheme where necessary.

Our primary areas of concerns regarding the scheme involve, but are not limited to, the following:

- Water quality (Modelling / impacts on species and habitats / proposed 'washouts' / impacts on Havant Thicket and Eastney Long Sea Outfall - both freshwater and marine and on the reservoir itself).
- Protection of groundwater and chalk aquifer, especially considering the karstic nature of some of the proposed construction area.
- Protection and enhancement of the biodiversity (marine and freshwater) associated with the river catchments and marine environments within the construction and surrounding areas.
- Flood risk associated with the proposal.

Overarching Comments

<u>Water Quality</u>

We are pleased to see that all water quality elements for both the operation and construction phases have been scoped in. We wish to ensure that there is adequate monitoring data to undertake water quality assessments (screening, risk assessment and modelling as needed) to determine if the Nationally Significant Infrastructure Project (NSIP) will have an impact on the receiving environment during the construction and operational phases. Water quality impacts from this NSIP can come from many sources which have been captured in the Scoping Report. We would therefore recommend that active water

quality monitoring continues to be scoped in and undertaken throughout the process and phases of construction and operation.

The water quality of the Water Recycling Plant (WRP) will be unique as it will be remineralised reverse osmosis water. The impact of this water on the effluent quality at Budds Farm, within Havant Thicket Reservoir (and any linked watercourses), at Otterbourne WRP and the impact it may have on the quality of the long sea outfall (LSO) at Eastney must be assessed as advised. We have given guidance on the screening and assessment of hazardous substances and emerging substances and advise that this work is scoped into the ES for all discharges to surface, ground, and coastal waters.

We have offered to undertake water quality discharge permitting pre-application assessment of all chemicals present in all the discharges from this NSIP. We welcome early submission of all collected monitoring data for effluents (including those current and proposed).

Groundwater & Contaminated Land

A robust discovery strategy is required to address any previously unidentified contamination discovered during construction works.

Flood Risk

We are pleased to see reference for the requirement of a detailed Flood Risk Assessment (FRA) to be prepared in support of the ES and included as part of the Development Consent Order (DCO) application. We would still wish to see Flood Risk covered as a separate chapter within the ES itself.

Flood Risk Activity Permit

Please note that this development and the associated works on the site may require a permit under the Environmental Permitting (England and Wales) Regulations 2016 from the Environment Agency (EA) for any proposed works or structures, in, under, over or within 8 metres / 16 metres (tidal) of the top of the bank of a main river. This type of permit is called a 'Flood Risk Activity Permit'.

Further details about Flood Risk Activity Permits can be found on the gov.uk website using the following link –

https://www.gov.uk/guidance/flood-risk-activities-environmental-permits

The Applicant should note that a permit is separate to and in addition to any planning permission / DCO granted. The granting of planning permission / DCO does not necessarily lead to the granting of a permit.

To enquire about the permit application process, the Applicant should contact our National Customer Contact Centre on **03708 506 506** (Monday to Friday 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk.

Dewatering

Please note that dewatering is no longer exempt from licensing unless you are able to meet the conditions set out in regulation 5 of the Water Abstraction and Impounding (Exemptions) Regulations 2017

Pollution Prevention

All precautions must be taken to avoid discharges and spills to the ground both during and after construction. For advice on pollution prevention measures, we recommend the Applicant refer to

guidance 'PPG1 – General guide to the prevention of pollution' and 'PPG 5: Works in, near or over watercourses' which are especially relevant to this proposal.

Ultimately, we would expect to see a Construction Environmental Management Plan (CEMP) specifying any pollution prevention measures that will be incorporated into any works.

Storage of Hazardous Substances

We would expect to see details about how the storage of any hazardous substances to be utilised during works will be managed within the ES. Ultimately, we would expect to see a CEMP detailing the above.

It should be noted that depending on the substances, hazardous substances consent may well be required separate to the DCO process. Further information can be found on GOV.UK website –

https://www.gov.uk/guidance/hazardous-substances#Deciding-hazardous-substances-consent

Surface Water

It should be noted that responsibility for surface water matters in terms of quantity and flow lies with the Lead Local Flood Authority. We recommend that they are consulted in regard to the drainage proposals related to surface water. Our considerations in regard to surface water relate to the potential mobilisation of contaminants, which may impact the Main Rivers and/or groundwater.

Comments on Specific Sections of the Report

Chapter 1 – The Applicant

Section 1.2.2

Reference is made to the Section 20 (s20) agreement as an '*operating agreement between the EA and Southern Water*'. This should be amended to reflect correct reference to this agreement as a legal agreement between Southern Water and the EA:

'The Operation of Abstractions from the River Itchen, Candover boreholes and River Test: Agreement under Section 20 of the Water Resources Act 1991'.

The legal agreement enables Southern Water to apply for their drought deficit using drought purposes subject to being permit application ready.

Section 1.3.8

We note this EIA refers to drought only operation of the scheme. Should this be changed to a different mode of operation we would expect the assessment to be amended accordingly.

Section 1.5.4

We note that the EIA scoping is in relation to an initial Phasing of 20 Ml/d with a subsequent Phasing of an additional 60Ml/d WRP.

Should this be changed to a different mode of operation we would expect the assessment to be amended accordingly.

We have previously understood that sweetening flow would not be the 20Ml/d stated in the document. We welcome understanding this difference in future information / discussions.

Chapter 2 – Planning legislation and policy

Section 2.3.6

With regard to Regional Planning - Water Resources South East plan – there needs to be a clear link between these. If the scheme / plan were to change such that the mode of use / operation of this scheme were to change then account must be taken of this.

Chapter 3 – Description of the Proposed Development

Section 3.3

We note that the volumes of water to be treated are as follows:

- 26 Ml/d abstracted for 20 Ml/d recycled water
- 80 Ml/d for 60 Ml/d recycled water

Should this be changed to a different mode of operation we would expect the EIA to reflect this and be amended accordingly.

Section 3.5

The Scoping Report identifies that the Water Recycling Plant (WRP) is on a former domestic landfill but the increased need for investigation and risks to groundwater need to be included, particularly as underground pipes and tunnels will be used to connect the WRP to Budds Farm and Havant Thicket which will disturb the waste.

Robust characterisation of the waste materials present and assessment of the risk to controlled waters will be required. Piling and underground pipes and tunnels present a risk of mobilising contaminants and therefore remediation and / or significant mitigation measures will be required. While not within the Source Protection Zone (SPZ) designated to protect Portsmouth Waters Havant and Bedhampton Springs Public Water Supply, the WRP is close to the SPZ and due to the karstic nature of the chalk in this location any underground construction works must be very carefully designed to prevent contamination of groundwater.

Section 3.5.5

Several options for the proposed underground pipelines are considered throughout Section 3.5. Risks to controlled waters will need to be considered in the detailed design phase when deciding which method of construction to utilise.

Section 3.7

The Scoping Report states that the effects from decommissioning would be similar or less than those of construction. However, the risks posed by unused underground conduits, tunnels and pipes need to be included also. These features could act as preferential pathways for contamination and would need to be backfilled and decommissioned appropriately to ensure that these risks are removed. These risks need to be considered upfront so that they do not pose a risk to the water environment at the end of the life of the scheme.

Chapter 5 – EIA approach and methodology

Section 5.5.5

We welcome the reference / inclusion of Biodiversity Net Gain (BNG). However, given the scale of the project it is disappointing that the minimum 10% is being referred to. We would strongly support greater ambition here and we would welcome greater ambition for BNG to be reflected in the technical appendix proposed to accompany the ES.

Chapter 8 – Terrestrial and freshwater biodiversity

Table 8-3: Terrestrial freshwater biodiversity Desk Study areas

The table refers to professional judgement to determine the distance from the scoping area for statutory designated nature conservation sites. We feel this is vague. All sites that are hydrologically connected should be scoped in. The scoping distance of 200m is given for habitats and species, with limited justification as to why this is considered the maximum distance for risk via air and water. For example, changes to water quality affect species beyond 200m.

With regards to the Special Areas of Conservation (SACs) for designated bat populations – as well as Bat Conservation Trust (BCT) good practice guidance, should the scoping distance and justification not be based on existing data? Substantial bat data has been collected associated with the exiting Portsmouth Water Havant Thicket Reservoir project, including radio tracking data. It is unclear how this work has informed the Zone of Influence (Zoi) decision.

Section 8.5

Baseline conditions for fish have been omitted. Albeit they are referred to under Section 8.8.7 for additional baseline gathering. Freshwater fish, including migratory species are an important part of freshwater biodiversity and should be fully assessed. There is existing fish data that could have been drawn into this section to start to establish the baseline, including EA fish monitoring data. This information is available from EA Ecology & Fish Data Explorer

Table 8-6: Scoped in effects (construction) – Terrestrial freshwater biodiversity

We would expect operational noise aspects during construction and operation on terrestrial, riverine and marine habitats to be considered.

The text in the table recognises the potential disturbance to protected and notable species because of noise effects. Noise and vibration should be considered in relation to fish (all life stages) too. High intensity noise can disturb or even harm fish. Incubating eggs are at risk from vibration, which could arise from tunnelling activities. Several papers to support the assessment were provided to Southern Water following a pipeline route walkover in 2022.

In addition, whilst the table does highlight the potential introduction and or spread of non-native species and disease, it is important that it considers the risk associated with this issue via the transfer of water, particularly between catchments.

Section 8.8.7

We welcome the additional baseline gathering. However, we would highlight that survey techniques must be appropriate. Aquatic macroinvertebrate surveys in ephemeral waterbodies must be suitable for this environment. For this environment / habitat type we would recommend the Mis-index survey approach.

Chapter 9 – Marine Biodiversity

Section 9.6.6

With reference to Table 9-20: Scoped in effects (operational phase) – Marine biodiversity, there is no mention of water quality changes from the resulting compensatory discharge from Havant Thicket Reservoir. Recycled water will be added to Havant Thicket Reservoir. This will result in water quality change and potentially impacts on downstream habitats and species. This impact is likely to span several chapters. Where and how this will be assessed needs to be clear. This is a very important issues that needs to be given significant consideration.

Chapter 11 – Land Quality and Ground Conditions

This chapter identifies the need to understand the geology and hydrogeology but does not mention the karstic nature of the chalk which is particularly prevalent north of the Havant area. There is potential for significantly increased risk of rapid movement of water and potential contaminants in this location. This presents a significant increased risk for all construction works in this area and needs to be factored in. In addition, the study area may need to be extended in some locations to take account of karstic flow in the chalk.

Section 11.6.5

We support the inclusion of the risks from contaminants, including drilling mud, to migrate along newly created preferential pathways and needs to be included.

Section 11.6.7

We understand that chemical dosing tanks are proposed as part of the WRP and may be a requirement for the above ground plant. The storage of oils, fuel and chemicals can pose a risk to groundwater if spillage occurs. Section 11.6.7 includes risk of fuel, oil and chemical storage to surface water quality and ecological habitats but risks to groundwater also need to be scoped in.

Chapter 15 – Resource and Waste Management

The Scoping Report should include the fact that excavated landfill material, arising from the construction of the Water Recycling Plant on a historic landfill, is considered as waste and cannot be reused or redeposited as materials under the CL:AIRE Definition of Waste: Development Industry Code of Practice (version 2) and will need to be disposed of as waste.

Chapter 18 – Water environment

Table 18-4: Public Consultation 2022 responses

We are pleased to see that the need for a CEMP is included in the Scoping Report, and we support the need for a CEMP to be produced.

Section 18.4.3

We are pleased to see that flexibility will be required in the extent of the study area based on the observed site conditions. This is especially important where karstic features may be present in the chalk.

Baseline groundwater level and quality needs to be fully understood. A detailed understanding of the interactions between surface and groundwater interactions is required particularly for the sensitive chalk streams as there are a significant number that could be affected by this scheme and the risks to these needs to be assessed.

Sections 18.4.7 – Table 18-5: Source of baseline

The approach to the assessment has been informed by a desk study using EA archive data. The Applicant should actively collect their own water quality data from those waterbodies which may be affected by the construction and operation of the NSIP.

Section 18.5.43

There is no reference to the River Meon as compensatory habitat as agreed under the IROPI case, linked the Section 20 agreement as referred to in Section 1.3.

Section 18.5.75

The watercourse downstream of the embankment will be altered / restored as part of the agreed compensation package for the reservoir. This has been legally secured as part of the reservoir project, which has been assessed separately as highlighted. This will alter the future baseline (for the better, restoring the Hermitage stream) and needs to be fully acknowledged / addressed within this assessment. It must be demonstrated that the project being assessed here does not compromise achievement of the agreed compensation package aims.

Section 18.6.16

This section makes specific reference to the undertaking of 'washouts' for pipe maintenance and potential water quality implications. We would want to know what quantity of water is required to undertake these washouts and how often? Where is this sourced from? What will be the chemical composition of the water being washed out and the impacts of this washout? We are aware some pipes required a sweetening flow but would like to know if this is the case here too?

Section 18.6.4

We are pleased to see that dewatering is included in the Scoping Report. We will need to see further information on this in the ES. In particular, where the pipeline is due to cross / intercept or be installed close to more sensitive locations such as SPZs, river corridors, licensed abstractions and private supplies, groundwater dependent ecosystems, we will expect to see more discussion on the potential impact of the dewatering activities and any mitigation measures.

Please note that dewatering is no longer exempt from licensing unless you are able to meet the conditions set out in regulation 5 of the Water Abstraction and Impounding (Exemptions) Regulations 2017.

Section 18.7.3

We would welcome further engagement regarding the geomorphology baseline surveys. It would also be appropriate to consider the use of MoRPh (Modular River Survey) as it forms one component of a suite of tools developed for assessing the condition of rivers, streams, and canals as part of the Watercourse Unit Module within The Biodiversity Metric and the calculation of Biodiversity Net Gain as referred to in Section 5.5.5.

Section 18.7.9

Reference is made in this section to a marine water quality survey in the location of the Eastney LSO to gather baseline conditions which is welcomed but the detail of the study should be discussed with the EA to ensure its suitability.

Section 18.7.36 / 18.7.38 - Stage 2 scoping

It is stated in these sections that '*deterioration in the status of any water bodies is not expected at this stage'.* This statement must be satisfactorily demonstrated and outlined within the ES. Robust evidence is required to backup these statements and decisions before we could be able to agree with them. This will need to be explored and evidenced in the ES.

Section 18.7.46 & 18.7.47 – Water Quality Modelling

Whilst we are pleased that water quality modelling has been scoped in and is discussed for further assessment, the information set out in these sections is vague. Assessing the impact of the new WRP on Havant Thicket Reservoir and Eastney LSO are the two main pieces of work that must be scoped in and undertaken thoroughly and in consultation with the EA.

Also, as stated within the document, the modelling undertaken so far for various WRP peak outputs '*do not reflect the current proposed peak outputs of up to 60 Ml/d'*. Whilst this does give an '*indicative study area and likely scale of effects*' we would strongly recommend that these model parameters are updated to reflect the current proposed peak outputs of up to 60Ml/d and rerun to provide more robust evidence on which to base assessment and conclusions on within the ES.

Section 18.8.8

We will require adequate information regarding the WRP reject water at the ES stage. Whilst we acknowledge that some of this information may fall within the permitting regime, we will still need to be in a position of reasonable certainty that this mechanism can be taken forward as a viable solution. More detail on how the chemistry of the WRP reject water is being collected would be useful too.

Section 18.10 Summary – Table 18-9 Summary table

This table appears to scope out direct disturbance to surface water bodies during operation. We would wish to see consideration given to potential events such as a burst or breakage to the pipeline during operation. This is especially important in sensitive areas such as SPZs and near surface water. Leakage is not covered.

The long-term impacts of the permanent infrastructure on subsurface flow patterns and volumes are scoped out of the 'operational phase'. As long as this long-term impact will be assessed in the construction phase then we are satisfied it can be scoped out of the operational phase.

Surface water drainage during construction and from permanent infrastructure sites during operation needs to be included and mitigation measures taken to reduce the risks to controlled waters.

Chapter 19 – Cumulative Effects Assessment

Section 19.3.1

For the Cumulative Effects Assessment, the whole life / all elements of projects need to be included in the assessment. For example, the interaction with mitigation and compensation linked to the construction of Havant Thicket Reservoir.

Appendix 18-1 – Preliminary Hydrogeological Impact Assessment

Overall, this provides a good understanding of the geology and hydrogeology for each element. However, site specific data will be required to fully characterise the site and be reviewed on a site-by-site basis.

Section 2.2 details the local understanding for each section of the proposed development. We note that groundwater level and quality data has not been collated to date. This data will need to be collated at an early stage as longer term, seasonal changes need to be understood and will be important in understanding surface water and groundwater interactions.

Our opinion is based on the information available to us at the time of the request. If, at the time of the submission of the formal DCO, there have been changes to environmental risk(s) or evidence, and / or planning policy, our position may change.

Please do not hesitate to contact me using the contact details shown below should any queries arise from the above response.

Yours faithfully

Mrs. Laura Lax
Sustainable Places Technical Specialist

Direct dial [redacted]
Email: planningSSD@environment-agency.gov.uk

Feekins-Bate, Laura

From: Hampshire Water Project
Subject: FW: Water For Life Project by Southern Water - EIA Scoping Report

From: Peter Kneen
Sent: 22 August 2023 16:45
To: hampshirewaterproject@planninginspectorate.gov.uk
Subject: Water For Life Project by Southern Water - EIA Scoping Report

Dear Ms Shoesmith

EIA Scoping Report Consultation
Application by Southern Water Services Ltd – Development Consent Order
PINS Reference: WA010002-000010-230725

With regard to the above, thank you for consulting Fareham Borough Council regarding the Scoping Report. I have set out below the comments from the Council's Planning Department, and the various consultation responses from other services within the Council regarding this Report. In general, the Council has no concerns regarding the approach or methodology used for the overall scoping assessment.

Chapters 6 (Air Quality and Odour), 7 (Archaeology & Cultural Heritage), 8 (Terrestrial & Freshwater Biodiversity), 10 (Carbon & Climate Change), 11 (Land Quality & Ground Conditions), 12 (Land Use & Agriculture), 13 (Landscape & Visual Impact), 14 (Noise & Vibration), 16 (Socio-Economics, Tourism, Recreation & Health), 19 (Cumulative Effects Assessment) and 20 (Topics Scoped Out) have been considered by Fareham Borough Council. The remaining technical chapters are not the responsibility of the Borough Council and would need to be considered by Hampshire County Council or the Environment Agency.

Comments from Council's Contaminated Land Officer (Chapters 6 and 11: Air Quality and Contaminated Land):

Air Quality

I note the summary in section 6.10 of the main report and am in agreement with the suggested "scoped in" impacts for the construction phase. As the proposed route is not located near the Boroughs AQMA's, the existing elevated air pollution sources within Fareham are unlikely to have an impact on the development.

Contaminated Land

I note the information within the land quality section (11.5.9) of the main report and note the reference to figure 11.6 in Volume 3, I am however unable to see annotations or labels to accompany figure 11.6 and as such have compared the map with our existing historical mapping data. I note on figure 11.6 there are a number of highlighted areas that appear to correspond to areas highlighted on the Councils mapping data. As these areas relate to sources of potential contamination, including a number of areas of infilled land, I would expect to see further information be provided on each of these sites within the Environmental Statement or later submitted information. I note there is further information on specific features in later sections however again I am not able to relate these two locations within the scoping area, further clarification on these points should be provided.

Overall I am in agreement with the summary in section 11.10 for the scoped impacts for the constructional and operational phase.

<u>Comments from Council's Conservation Planner</u> (Chapter 7: Archaeology and Cultural Heritage)

<u>Relevant Local Planning Policies:</u>

In addition to the national policies governing Nationally Significant Infrastructure Projects, Polices HE1 (*Historic Environment and Heritage Assets*), HE2 (*Conservation Areas*), HE3 (*Listed Buildings and Structures*), HE4 (*Archaeology*) and HE5 (*Locally Listed Buildings and Non-designated Heritage Assets*) of the Fareham Local Plan 2037 are also relevant to this submission.

<u>Scoping Study:</u>

The assessment area for archaeology and cultural heritage has been defined as being within 1km of the defined scoping area. This should allow for the assessment not only of designated heritage assets which have the potential to have their setting directly impacted by the proposed pipeline but also to assess the likely potential for non-designated assets, such as archaeological deposits, to be discovered in advance of and during the construction process.

As defined in the scoping report the potential impact on heritage assets within the finalised route corridor broadly fall into three categories:

1. Direct and physical impact on heritage assets, both designated and non-designated (*including archaeological deposits*) in advance of and during the site investigation and construction phases of the project.
2. Temporary impact on the setting of designated and non-designated heritage assets (*including Scheduled Ancient Monuments, Listed Buildings and Registered Parks and Gardens*) during the construction phase of the project and following formal reinstatement.
3. Permanent impact on the setting of designated and non-designated heritage assets (*including Scheduled Ancient Monuments, Listed Buildings and Registered Parks and Gardens*) from the construction of permanent above ground compounds, plant or other facilities required for the operation of the pipeline.

<u>Heritage Assessment Methodology:</u>

As far as assessment methodology is concerned, the Scoping Report does appear to be identifying, consulting and collating the data from all the relevant data sources at both a local and national level. As discussed in the various Scoping Workshops, one of the key issues will be to ensure that the defined data sets are updated to ensure that the latest baseline data is included in the final report.

Any new information uncovered in advance of ongoing development or infrastructure projects in the vicinity of the scoping area (*especially with regard to archaeology*) should also be included in the final assessment as this may help identify and further the understanding of other previously unidentified potential impacts. A single seamless approach to heritage across the whole route corridor should also be adopted both with regard to both the analysis of existing data sets and through any further field survey, evaluation and analysis undertaken to inform the final heritage assessment.

As far as the potential impact from any permanent facilities is concerned, it is going to be difficult to fully understand this until the finalised the route options have been decided. Any designs for any permanent facility should work with the defined landscape and heritage constraints, rather than just using a standardised design. This should also be informed by the ongoing heritage assessment and landscape visual impact work.

In general, if the proposed assessment methodology is implemented as defined in the Scoping Report, I am content that the applicant will be addressing the main topics with regard to the potential direct and indirect impacts on both designated and non-designated heritage assets within the defined route corridor. Any measures outlined to minimize and mitigate the potential impact on both the built heritage and archaeological assets identified report will be subject to further review once the final Environmental Impact Assessment has been submitted.

Comments from Council's Ecologist (Chapter 8: Terrestrial and Freshwater Biodiversity)
I have reviewed the submitted Scoping Report, in particular Chapter 8 which is in relation to Terrestrial and freshwater biodiversity. Overall, I am satisfied with the statutory and non-statutory designated sites and protected species which have been scoped in. Similarly, the potential effects scoped in during the construction and operation phases (e.g. direct habitat loss, indirect impact on habitat through degradation, pollution, change in hydrology, etc.) are also acceptable. I am also content that great crested newts have been scoped out and will be dealt with through the use of the District Level Licence which is now up and running in Hampshire. It is also positive that a Shadow Habitat Regulations Assessment will be prepared. The baseline survey work for protected species which is currently ongoing is also acceptable.

You may wish to seek specialist advise in relation to Chapter 9 'Marine biodiversity'. However, I understand that Environment Agency have been consulted in the process and it is likely that the scope has been/will be agreed with them. It is however sensible that potential effects as a result of noise/vibration, pollution and Changes in effluent discharge, etc. have been scoped in and due to the nature of works in these areas (i.e. tunnelling) factors such as habitat loss, visual disturbance, introduction of invasive species, etc. have been scoped out.

Comments from Council's Planning Strategy Team (Chapter 10: Carbon & Climate Change)
This consultation response has regard to Chapter 10 of the EIA Scoping Report. The Council has no comments to make on the content or methodology, and concur with the scoping assessment.

Comments from Development Management Planner (Chapter 12: Land Use & Agriculture)
The are no specific comments in respect of Chapter 12 regarding land use and agriculture, and all the relevant matters of consideration have been scoped in the Report. It is noted that Boundary Oak School, Fareham does appear to have been omitted from paragraph 12.5.24, being within a 500m of this section of the Scoping Area. A primary school is also proposed to be constructed within the northern Phase 1 of Welborne Garden Village, which would also lie within the 500m area, although it is recognised that this does not currently exist. Otherwise, the Scoping report sets out the appropriate methodology so the various aspect of the proposal can be properly assessed.

Comments from Council's Urban Designer (Chapter 13: Landscape and Visual Impact)
This is a consultation regarding the EIA Scoping report for the proposed water transfer pipeline project. From an urban design perspective, my comments are limited to design and landscape matters only.

At this stage, there are no details that set out precisely which route the pipeline will traverse the borough. The scoping area identified in the report show two possible routes, being to the north of or through the future Welborne Garden Village development. therefore it It is not known therefore where the above ground plant and any associated topographical and landscape changes will take place and in what form.

However, the scoping report sets out the appropriate methodology as set out in para 13.2.18, such that the development's impact can be properly assessed. This states:

Relevant guidance and standards which have been used as part of the EIA scoping assessment include:

- *Landscape Institute and IEMA, 'Guidelines for Landscape and Visual Impact*
- *Assessment' Third edition (GLVIA3), 2013 and subsequent statements of clarification. [232]*
- *Landscape Institute, Technical Guidance Note 04/20: Infrastructure, 2020.[233]*
- *Landscape Institute, Technical Guidance Note 06/19: Visual Representation of Development Proposals, 2019 [234]*
- *Landscape Institute, Technical Information Note 05/17: Townscape Character Assessment, 2017. [235]*
- *Natural England (2014) An Approach to Landscape Character Assessment, [236]*
- *Natural England (2012) An approach to Seascape Character Assessment [237]*
- *Planning Inspectorate (No date) Advice Note Six: Preparation and submission*
- *of application documents, (Version 11) [238]*

I have no reason to consider that the methodology is in any way deficient. However, I do consider that some clarification and alteration is needed to take account of more recent discussions regarding the baseline and future design strategy for above ground plant. These are set out in the table below.

No.	Document	Paragraph or fig ref	Comment
	EIA Scoping Report Volume II - Appendices	Appendix 2.1 para 1.4	Relevant Local plan policy considerations should also include Policy D1 Design and placemaking as this considers the architectural quality of new development, such as Intermediate pumping stations (IPS) that are above ground plant, and how such structures need to respond to and integrate with local landscape character and topography. It also sets out the need to consider appropriate planting whether in mitigation or as an integral part of landscape design associated with above ground plant. It is noted that more expansive policy references are included in Table 13-9: List of relevant local policy contained in Vol 1 (p281)
	EIA Scoping Report Volume I – Main Report	Proposed Above Ground Plant Intermediate Pumping Stations Paras 3.5.16; 3.6.15	FBC would expect to see a commitment statement in this para to ensure that space/land acquisition for compounds and above ground plant is sufficient to ensure that the cut and fill design is such that spoil is graded to ensure that it is integrated appropriately with the existing landscape character and topography.
		13.3.6	It would be beneficial to highlight that issues identified at the meeting will/have been taken into account
		Table 13-11: Source of baseline data	It was understood that the ASLQ report and designations would be or should have been included in this table. They have been shown on the baseline maps in Appendix II appendices. See ref in para 13.5.4

		13.5.15	There should be ref somewhere to the principal that was advocated at the meeting, which highlighted the need for potential additional viewpoints once the route of the pipeline is established and where associated AGP is then situated.
		Table 13-23: Scoping summary table p327	The ASLQ's are not identified under the baseline ref. it is noted that the areas overlap, but the ASLQ's are backed by evidence and are linked to Local Plan policies.

Comments from Council's Environmental Health Officer (Chapter 14: Noise & Vibration)
The Council considers that the proposed scoping assessment has been thoroughly undertaken and no overriding concerns are raised. However, it would be important to ensure that any above ground plant noise should be no greater than background noise levels (LA90).

Comments from Council's Planning Strategy Team (Chapter 16: Socio-Economic, Tourism, Recreation and Health)
The effects of construction and operation scoped in/out of the assessment from socio-economic, tourism, recreation and health perspectives appear to be comprehensive for Fareham and the approach to mitigating effects will be developed in response to site specifics. Therefore I have no comments to add in relation to this.

Not of particular importance, but Page 419 has a missing paragraph reference in 16.6.13 'There are a wide range of health determinants that can affect health outcomes, and health determinants considered relevant to the construction phase of the Proposed Development have been listed in paragraph… '.?

I have also noted some discrepancies in relation to the report's referencing Fareham's development framework:

Page 108 includes the FBC Core Strategy (2011) [107] and policy CS4, which has been superseded and therefore this reference should be removed.
Page 553 [85] references the FBC Core Strategy (2011), this should refer to the Fareham Local Plan 2037 (2023) as included on page 84.
Page 554 [106] references the FBC Core Strategy (2011), the reference numbers seem to be misaligned as the report, as it appears this relates to the inclusion on page 108 [107] above.
Page 565 [329] references FBC Local Plan 2026 (2011), although this is not something I can find elsewhere in the report, it is just an entry in the list of references.

Comments from Development Management Planner (Chapters 19-21)
Chapter 19 – Cumulative Effects Assessment. Following a review of the proposed methodology and the scoped in matters outlined, no comments or concerns regarding this chapter, although it is important to ensure that the major development of Welborne Garden Village is considered. This development has a likely 30 year timeframe with Phase 1 anticipated to start later this year, which coincides with the proposed route of the pipeline.

Chapter 20 – Topics Scoped Out
The Council has no comments or concerns with the matters outlined within this chapter.

Chapter 21 – Structure and content of the ES
The Council has no comments or concerns with the proposed structure and content of the Environmental Statement.

Please can you confirm receipt of this response.

Kind regards

Peter Kneen
Principal Planner (Development Management)
Fareham Borough Council
[redacted]

Feekins-Bate, Laura

From:	Planning Consultation SEL <planningconsultationSEL@forestrycommission.gov.uk>
Sent:	31 July 2023 13:08
To:	Hampshire Water Project
Subject:	FW: WA010002 - Hampshire Water Transfer and Water Recycling Project - EIA Scoping Notification and Consultation
Attachments:	WA010002 - Statutory consultation letter.pdf; Forestry Comission Planning Guidance Annex 1.pdf

Dear Marie Shoesmith,

Thank you for taking the time to consult the Forestry Commission regarding this application. We are currently receiving a significant number of planning consultations. We are triaging all requests and may have further comments as a result; however, this response should be considered to be the Forestry Commission's formal response to this consultation unless we provide subsequent comments.

As a Non-Ministerial Government Department, we do not provide an opinion supporting or objecting to planning applications. Instead, we provide advice on the potential impact that proposed developments could have on trees and woodland using our local knowledge and expertise, planning policy and legislation that could be relevant and measures that could help to avoid or limit impacts and result in overall gains wherever possible.

The planning authority should consider the following policy and guidance as part of their decision-making process for this application.

1. **Ancient woodlands, ancient trees and veteran trees are irreplaceable habitats.** Paragraph 180(c) of the NPPF sets out that development resulting in the loss or deterioration of irreplaceable habitats should be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists. In considering the impacts of the development on Ancient Woodland, Ancient and Veteran trees, the planning authority should consider direct and indirect impacts resulting from both construction and operational phases.

   Please refer to Natural England and Forestry Commission joint Standing Advice for Ancient Woodland and Ancient and Veteran Trees, updated in January 2022. The Standing Advice can be a material consideration for planning decisions, and contains advice and guidance on assessing the effects of development, and how to avoid and mitigate impacts. It also includes an Assessment Guide which can help planners assess the impact of the proposed development on ancient woodland or ancient and veteran trees in line with the NPPF.

2. **Existing trees should be retained wherever possible, and opportunities should be taken to incorporate trees into development.** Trees and woodlands provide multiple benefits to society such as storing carbon, regulating temperatures, strengthening flood resilience and reducing noise and air pollution.[1] Paragraph 131 of the NPPF seeks to ensure new streets are tree lined, that opportunities should be

taken to incorporate trees elsewhere in developments, and that existing trees are retained wherever possible. Appropriate measures should be in place to secure the long-term maintenance of newly planted trees. The Forestry Commission may be able to give further support in developing appropriate conditions in relation to woodland creation, management or mitigation.

For all planning applications, we advise the Council to carefully consider the previous usage of sites, including historical satellite imagery, to consider if development is being proposed on recently felled woodland. Please contact us if you suspect this is the case.

3. **Biodiversity Net Gain (BNG):** Paragraph 174(d) of the NPPF sets out that planning (policies and) decisions should minimise impacts on and provide net gains for biodiversity. Paragraph 180(d) encourages development design to integrate opportunities to improve biodiversity, especially where this can secure net gains for biodiversity. BNG offers opportunities for protecting (retaining) trees and woodlands, as well as new planting and enhancement of existing trees and woodlands, and the planning authority also should consider the wider range of benefits trees, hedgerows and woodlands can provide as part of delivering good practice biodiversity net gain requirements. Ancient woodlands (including PAWS) and ancient & veteran trees are already recognised as irreplaceable habitats and as such are exempt from the net gain requirement.

We would also like to remind applicants that tree felling may require a felling licence from the Forestry Commission.

Please refer to Annex 1 attached for further guidance and advice that we hope you find helpful.

If you have any particular concerns that are not covered by the above, please contact us again highlighting any specific issues for us to consider in more detail.

Yours sincerely,

South East and London Area Team

Forestry Commission South East & London
Bucks Horn Oak Hub
Farnham
Surrey
GU10 4LS

www.gov.uk/forestrycommission

From: Hampshire Water Project <HampshireWaterProject@planninginspectorate.gov.uk>
Sent: Tuesday, July 25, 2023 11:08 AM
Cc: Hampshire Water Project <HampshireWaterProject@planninginspectorate.gov.uk>
Subject: WA010002 - Hampshire Water Transfer and Water Recycling Project - EIA Scoping Notification and Consultation

This Message originated outside your organisation.

Dear Sir / Madam

Please see attached correspondence on the proposed Hampshire Water Transfer and Water Recycling project.

Please note that the deadline for consultation responses is **22 August 2023**, and is a statutory requirement that cannot be extended.

Kind regards
Laura

The Planning Inspectorate

Laura Feekins-Bate
Senior EIA Advisor
The Planning Inspectorate

The statements expressed in this e-mail are personal and do not necessarily reflect the opinions or policies of the Inspectorate.

DPC:76616c646f72

[redacted]

Annex 1: Policy Framework, Related Guidance and Sources of Further Information

Policy and Guidance:
Keepers of Time – A Statement of Policy for England's Ancient and Native Woodland (updated May 2022). Includes definitions of ancient woodland, ancient and veteran trees, and sets out the importance of these habitats.
Policy Principles and Strategic Objectives include:

- *Maintaining and enhancing the existing area of ancient woodland*
- *Conserving and enhancing the existing resource of ancient and veteran trees.*

National Planning Policy Framework (published July 2021).
Paragraph 180(c) – irreplaceable habitats.
Paragraph 131 – street trees, trees within developments, and retention of existing trees.

Standing Advice for Ancient Woodland and Veteran Trees (first published October 2014, revised January 2022)
This advice, issued jointly by Natural England and the Forestry Commission, is a material consideration for planning decisions across England. It provides advice on how to avoid and mitigate impacts, and on compensation schemes where the tests set out in the NPPF are met The Standing Advice also includes an Assessment Guide, which can help planners assess the impact of the proposed development on the ancient woodland.

National Planning Practice Guidance – Natural Environment Guidance. (updated July 2019)
This Guidance outlines the Forestry Commission's role as a non-statutory consultee and supports the implementation and interpretation of the National Planning Policy Framework in relation to ancient woodland and ancient and veteran trees, and clarifies that existing woodland condition should not affect the planning authorities consideration of proposals.

Felling Licences and Environmental Impact Assessment
Felling Licences - Under the Forestry Act (1967) a Felling Licence is required for felling more than 5 cubic metres per calendar quarter. Failure to obtain a Licence may lead to prosecution and the issue of a restocking notice.

Environmental Impact Assessment - Under the Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999, as amended, some proposals involving afforestation, deforestation, forest roads or forestry quarries may require 'stage 2' Consent from the Forestry Commission before they can be carried out. For these project types the applicant should determine if their proposal needs Consent (referring to guidance as necessary), or approach the Forestry Commission for a 'stage 1' opinion as to whether or not Consent is required.

Hampshire County Council

Planning Inspectorate
Environmental Services Operations Group
3 Temple Quay House
2 The Square Bristol,
BS1 6PN

Hampshire 2050
The Castle
Winchester, Hampshire SO23 8UL
Telephone 0300 555 1375
Fax 01962 847055
www.hants.gov.uk

Enquiries to	Neil Massie	*My reference*	SWDCO Scoping Opinion
Direct Line	[redacted]	*Your reference*	
Date	17 August 2023	*Email*	[redacted]@hants.gov.uk

Emailed to: hampshirewaterproject@planninginspectorate.gov.uk

Dear Sir,

Re: Hampshire Water Transfer and Water Recycling Project

Thank you consulting Hampshire County Council on the above EIA Scoping Opinion. The County Council has been actively working with the applicant through a series of pre-application working groups and meetings to understand the scheme as it develops and to provide the necessary technical input that the County Council would expect to form part of the Environmental Statement to support the submission of a Development Consent Order.

It is understood that the proposed project is for a Water Recycling Plant (WRP) and associated Pipelines to transfer water across the network which includes a pipeline connecting to the Havant Thicket Reservoir, a pipeline connecting the Budds Farm Wastewater Treatment Works (WTW) and the WRP and one longer pipeline connecting to the Otterbourne Water Supply Works (approximately 40km in length).

The above infrastructure will also be supported by above ground plant in the form of:

- High Lift Pumping Station (HLPS)
- Intermediate Pumping Stations (IPS)
- Break Pressure Tanks (BPT)

Associated works would include temporary development works to support construction, works to support operation and maintenance, site accesses,

temporary and permanent utility connections, highway diversions and landscaping, environmental mitigation, enhancement and compensation.

As shown in Figure 1.1 of the EIA Scoping report, the proposed inland infrastructure is within five local authority administrative areas, entirely within the County Council administrative area (the Scoping Area).

Whilst acknowledging that the scheme continues to evolve and the final pipeline routings have not been confirmed, in summary the County Council is broadly satisfied that the Scoping Opinion has been produced to an acceptable standard and has considered most of the areas that would be expected for a proposal of this nature.

The County Council does however reserve the right to comment further in future on the scope and detail of the development proposal through the pre-application process as it continues to develop.

The County Council provides its technical comments in respect of suggested amendments, missing information and suggested issues to scope in, within a series of appendices. Comments are provided in the County Council's capacity as the local highway authority, Highway Authority in respect of Public Rights of Way (PROW) and Commons Registration Authority; local mineral and waste planning authority, and lead local flood authority; alongside comments focussing on archaeology, landscape, and public health issues.

If you have any questions about any of the technical comments in this response please do get in touch with my colleague, Neil Massie who is leading on this project on behalf of the County Council.

Yours faithfully,

Emily Howbrook MRTPI

Strategic Planning Manager

Hampshire 2050

Appendix 1 - Local Highway Authority

The Highway Authority consider that the impacts both during the construction phase and operational phase should be considered by the applicant. The EIA Scoping report suggests that the Highway Authority have agreed this to be the case. Whilst operational use impacts are likely to be significantly less, insufficient information has been provided to confirm the requirements and therefore it cannot be agreed at this stage to exclude operational use impacts from consideration.

This is supported by the requirements set out within NPPF and the National Policy Statement for Water Resources Infrastructure (NPSfWRI). As set out within the NPSfWRI the traffic and transport impacts can vary widely and influence other key stakeholder areas such as noise, air pollution and socio-economic impacts.

In this instance the Highway Authority consider that due to the extent of construction works for both under and overground infrastructure, the populated nature of some areas and the level of interaction with the highway asset that it is likely to have significant transport implications and therefore the ES should include a transport appraisal which is supported by the following documentation:

- Transport Assessment (TA) of construction and operational phases with the scope of the TA work to be agreed with the Highway Authority but considering the impact of these phases of works on all modes walking, cycling, buses and vehicles.
- A Framework Construction Traffic Management Plan (CTMP) setting out the proposed construction methodologies and CTMP parameters.
- A Framework Traffic Management Plan setting out the proposed traffic management working arrangements for works within all areas of the highway including Public Rights of Way.
- Travel plan for the construction and operational phases of development.
- Identification of appropriate mitigation measures to minimise the impact of the construction and operational phases.

It is noted that a significantly sized construction hub will be necessary to support the construction of the proposal and it is considered that this will not be covered within the scope of the EIA work. The assumption is that an existing suitable site with appropriate planning will be utilised, but these have not been identified. There appears significant risk that a large element of work is being omitted from the EIA which impacts the wider transport impacts and fails to fully consider the application requirements as a whole. The temporary construction hub should therefore be considered within the EIA as it will

generate significant traffic movements which should be duly considered within the project, rather than as a result of a stand-alone application.

It is understood that the construction phase will be for 6 years with the proposals being operational for 100 years before decommissioning would be necessary there is some discrepancy on whether the assessment year is 5 or 6 years throughout the EIA Scoping Report, clarity is sought on that point.

Section 17.3.1 of the Scoping Report Volume 1 lists key stakeholders and those who have responsibility for traffic and transport aspects. National Highways are excluded from this list and should be included.

Paragraph 17.5.2 describes Harts Farm Way as a short street. The Highway Authority do not agree with the designation of Harts Farm Way as a street. It is subject to a 30mph limit but has no residential frontage, is wide and serves as a key local distributor road from Havant to the strategic road network. Due to its industrial nature, it is also subject to a significant amount of HGV movements. The function of Harts Farm Way is therefore considered to be as a local distributor road.

National Cycle Network (NCN) 22 along Harts Farm Way and is not noted within the EIA scoping. This should be acknowledged and considered appropriately when looking at the impacts of the development proposals and accessibility of the site.

The A3023 is appropriately identified as the only road linking Hayling Island to the mainland. It is highly traffic sensitive along with the Langstone Roundabout at the north of the route.

Penner Road is identified as providing a connection between the A3023 and Southmoor Lane which is not correct. Any access is gated and controlled, and this is not a route open to all traffic.

Section 17.5.13 refers to the B2149 running through the Kingley Green residential area, it is questioned if this is an error in referencing. The B2149 is also not recognised as a key access route for all modes within the Havant area and for wider journeys further north to join the A3(M). Middle Park Way is described similar in its community function which is not agreed. Middle Park Way is a residential primary street and directly serves residential properties with frontages, traffic calming, shopping areas and access to schools and a 20mph speed limit. This will have an impact on the effects of any construction traffic.

Section 17.7 sets out that data that is less than 4 years old will be considered appropriate for base data, whilst it also notes that data used will be agreed by the Emissions and Transport EIA Working Group any data collected between March 2020 – March 2022 is unlikely to be considered appropriate base data due to the impacts of the Covid 19-pandemic. Any data for the remainder of 2022 would need to be considered on its own merits depending on the location and ability to demonstrate that travel patterns were settled or back to

2019 levels. The Highway Authority would consider the use of 2019/2020 pre covid survey data.

Section 17.7.18 whilst agreed to be relevant for the purpose of the EIA work does not apply to the TA work. Thresholds set by the IEA Guidelines relate solely to EIA impacts, these thresholds however do not translate to a classification for non-significant highway impacts, these must be assessed on a case-by-case basis and whilst for example the EIA assessment may not deem the impact to be severe the Highway Authority may still consider the impact to be significant and therefore require appropriate mitigation. The difference between the EIA assessment criteria and that of Transport Assessments is reflected within the IEA Guidelines and should be referenced appropriately.

Driver and Bus Delay should also consider the impact of the traffic management measures on links themselves and the cumulative impacts this may have resulting in increased journey times or reductions in the reliability of the journey times for both drivers and bus services.

Accident and safety assessments should also consider the impact in the change of vehicle composition utilising a route such as a significant increase in HGV movements which in turn can impact the safe operation of the particular road or street.

The EIA scoping note does not acknowledge the direct cumulative impacts of the Portsmouth Water pipeline associated with Havant Thicket approved within application APP/20/00990. Given the direct connectivity between the two schemes the interaction between the construction works and the reservoir operation they should be duly considered when seeking to minimise the EIA and wider transport impacts and consideration of suitable alternative construction methods.

The Highway Authority note information is included on geology and ground water levels within appendices of the EIA scoping note. The Highway Authority have not been involved in this matter to date and welcome further direct engagement when determining the details of this area of the scheme and involvement in the relevant working group to ensure that the highway asset is suitably protected.

Appendix 2 - Minerals and Waste Planning Authority

Chapter 15 (Resource & Waste Management) is of most relevance to the County Council in its capacity as the local minerals and waste planning authority (MWPA). The County Council generally agrees with the reported information and the scope set out, but identifies a number of areas where Southern Water need to clarify the information that is included and / or where Hampshire County Council can provide additional information at this stage of the scheme development process.

Paragraph 15.4.6 – The MWPA would be interested in seeing the methodology used for calculating the percentages of waste managed arising from the South East, as reported in Paragraph 15.4.6. Based upon the County Council's own calculations from the Environment Agency Waste Data Interrogator 2021, information in the Hampshire County Council table 1 (see below), shows a more accurate representation of waste managed arising in the South East:

Table 1 – Hampshire County Council estimate for South East waste arisings management (comparison with figures in table 15.4.6 of Scoping Main Report)

		Waste Management Area									
		South East	South West	North East	North West	East of England	East Midlands	West Midlands	Yorks & Humber	London	Unknown
Inert Waste	Para 15.4.6	81%	19%	-	-	-	-	-	-	-	-
	HCC estimate	86.8%	0.6%	-	0.1%	3.7%	1.6%	0.2%	0.5%	5.6%	1.0%
Non-haz / HIC Waste	Para 15.4.6	45%	53%	-	-	-	-	-	1%	-	-
	HCC estimate	77.3%	2.0%	0.1%	1.0%	5.0%	1.5%	1.3%	0.3%	10.0%	1.3%
Haz Waste	Para 15.4.6	20%	70%	-	-	2%	1%	2%	-	-	-
	HCC estimate	43.9%	6.3%	0.3%	2.2%	16.4%	10.6%	9.7%	3.0%	7.3%	0.2%

Table 15-2: Source of baseline data – Table 15-2 does not highlight Hampshire's Local Aggregate Assessment (LAA) as a source for baseline data. However, the LAA is noted in the References Section and data within Table 15-4 appears to have been taken from the LAA.

Table 15-4: Availability of construction resources in Hampshire, South East England and UK – The data underneath the South East England (2021) heading is noted as being shown in million tonnes (Mt), however the data shown is taken directly from the South East England Aggregate Working Party Annual Report which reports all figures in thousand tonnes. The unit in brackets under this section of Table 15-4 needs correcting.

Additionally, the South East England (2021) sand and gravel Reserve figure (67,000) in Table 15-4 is incorrect. The South East had sand and gravel reserves of 54,349 thousand tonnes in 2021. This figure is shown correctly in Table 15-6.

Paragraph 15.5.24 – 15.5.35 – A recent update to the HMWP Safeguarded Sites has added the following sites, the proposed pipeline easement lies within the buffer zone of these sites.

- Highbridge Wastewater Pumping Station;
- Bishop's Waltham WTW and,
- Wickham WTW.

Paragraph 15.6.9 –reports no data is available on the consumption of recycled and secondary aggregates. Recycled and secondary aggregates annual production data is contained within Hampshire's Local Aggregate Assessment (LAA) which, as previously mentioned, appears to have been used in Table 15-4 and is noted in the References Section.

Although the Southern Water project is not being taken forward for consent as a series of cross boundary wastewater management planning applications, there are local planning policies in the *Hampshire Minerals and Waste Plan* (2013) (HMWP) relevant to several EIA Chapters. These plan policies should therefore be referenced alongside other policy and strategy documents. Relevant policies of the HMWP that should be referenced and considered within the relevant chapters of the EIA are set out with commentary (see table 2):

Table 2 – Hampshire Minerals and Waste Plan Policy references

EIA Chapter	HMWP Policy	Comments
Chapter 6 – Air quality and odour	Policy 10 (Protecting public health, safety and amenity)	
Chapter 7 – Archaeology and cultural heritage	Policy 7 (Conserving the historic environment and heritage assets)	

EIA Chapter	HMWP Policy	Comments
Chapter 8 – Terrestrial and freshwater biodiversity	Policy 3 (Protection of habitats and species)	
Chapter 9 – Marine biodiversity	Policy 3 (Protection of habitats and species)	
Chapter 10 – Carbon and climate change	Policy 2 (Climate change – mitigation and adaptation)	
Chapter 11 – Land quality and ground conditions	Policy 10 (Protecting public health, safety and amenity)	
Chapter 12 – Land use and agriculture	Policy 10 (Protecting public health, safety and amenity	Additionally, the title of Policy 19 in Table 12-1 is incorrect. This should be corrected to 'Aggregate wharves and rail depots'.
Chapter 13 – Landscape and visual impact	Policy 4 (Protection of the designated landscape)	
Chapter 14 – Noise and vibration	Policy 10 (Protecting public health, safety and amenity)	Policy 14 (Community benefits) of the HMWP should be removed from Table 16-1 in this chapter.
Chapter 15 – Resource and waste management	Policy 31 (Liquid waste and wastewater management	
Chapter 16 – Socio-economics, tourism, recreation and health		Policy 14 (Community benefits) of the HMWP should be removed from Table 16-1 in this chapter.
Chapter 17 – Traffic and transport	Policy 12 (Managing traffic)	
Chapter 18 – Water environment	Policy 10 (Protecting public health, safety and amenity) and Policy 11 (Flood risk and prevention)	
Chapter 19 – Cumulative Effects Assessment	Policy 10 (Protecting public health, safety and amenity) of	

Section 23 – Abbreviations: The acronym HMWP, for Hampshire Minerals and Waste Plan, appears twice on Page 543 of the Abbreviations Section.

Section 24 – References and throughout: The References numbered throughout the document with square brackets, [xxx], do not appear to match up correctly to the same number in Section 24. For example, reference [300] in the text of Chapter 15 is supposed to be for the Marine Aggregates: Capability and portfolio 2021 produced by the Crown Estate, but in Section 24 reference [300] is for the Hampshire Minerals and Waste Plan: Partial Update - Draft Plan.

Further information on Hampshire County Council's approach to safeguarding is available in the adopted Minerals and Waste Safeguarding in Hampshire Supplementary Planning Document (SPD), which can be found on our website.

Appendix 3 - Lead Local Flood Authority

The County Council in its capacity as the Lead Local Flood Authority is satisfied that the water environment has been scoped into the EIA and that a detailed Flood Risk Assessment will be included within the Environmental Statement to support the Development Consent Order application.

The scoping report highlights the points raised in previous meetings with the County Council, and how they will be incorporated into the relevant documents. The County Council is satisfied with the proposed scope as it currently stands.

Appendix 4 - Archaeology and Historic Environment

Chapter 7 of the main report addresses archaeological matters, which the County Council endorses. It is acknowledged within the report that there will be archaeological impacts associated with this project that will need to be reviewed, assessed, accommodated, and mitigated, and as a consequence archaeological matters have been scoped in which is welcome.

The County Archaeologist is aware that the applicant has already taken steps to secure preliminary archaeological advice from their own archaeological advisors and from the EIA Working Group (Historic Environment and Landscape Working Group) which has already met (para 5.3.4 and 7.3.1 and 2). The County Archaeologist has attended these meetings on behalf of the County Council and their scope, discussion and progress is properly reflected in Chapter 7.

Appendix 5 - Landscape

The County Council will be considering the holistic landscape impacts of this project along the geography of the proposed pipeline route and are keen to ensure that any impacts on Hampshire's landscape are managed and mitigated in an appropriate way. In respect of landscape, the County Council is satisfied that it is a through document setting out the approach to the production of the Environmental Statement.

However, the County Council take this opportunity to state that the assessment of landscape character, should not just assess the effects against the published Landscape Character assessments. It also needs to assess the effects on landscape elements i.e., topography & vegetation loss.

Table 13-17 sets out the criteria for judging the value of the visual impacts. There is no mention of the value local people may put on a view. In the recently published National Policy Statement for Water Infrastructure it states in 4.9.15 "*Outside nationally designated areas, there are local landscapes and townscapes that are highly valued locally*". Whilst this statement relates to landscape character assessments, it applies equally to visual assessments.

Finally, within the Environmental Constraints Plans, there are a lot of areas marked up with 'pink / brown dots', which do not appear in the key. It is assumed that these areas are part of the water source protection zones, but it would be helpful to have accurate Keys on the plans that can be interpreted easily.

Appendix 6 – Public Health

Hampshire County Council has statutory duties for Public Health, and as such has responsibility for promoting and protecting the public's health. The comments provided below refer to Chapter 16 - Socio-economics, tourism, recreation and health.

Hampshire Public Health has also considered the related elements of the sections on: Air quality and odour; Terrestrial and freshwater biodiversity; Land use and agriculture; Landscape and visual; Noise and vibration and Traffic and transport.

Hampshire Public Health welcome what appears to be a generally comprehensive scoping document; however, it is noted that links to the section regarding climate change are not referred to in chapter 16. The links here are felt to be important and this should be included as the public health and climate issues very often have related impacts/benefits.

Health considerations and references.

Hampshire Public Health would expect a full Health Impact Assessment (HIA) to be carried out as part of the Environmental Impact Assessment to better inform the Environmental Statement. The guidance being used within the scoping document refers to 'Rapid HIA Guidance' (HUDU) which would not be sufficient for this scale of infrastructure project.

Hampshire Public Health would also like to raise the issue that some of the guidance sited within the document, while useful, is dated ranging from 2011 – 2015, this also predates changes to EIA legislation in 2017. More up to date document guidance should be looked at such as ARUP 'Exploring and Health Led Approach to Infrastructure' (2018) Exploring a health led approach to infrastructure - Arup and the Governments own 'Health Impact Assessment in Spatial Planning (2020) Health Impact Assessment in spatial planning - GOV.UK (www.gov.uk).

It is noted that the JSNA is being used for Air Quality Data but the Hampshire County Council Power BI has recently been updated and should be used as a helpful tool for assessing other fields set out in Table 16-3 on page 399 - Joint Strategic Needs Assessment (JSNA) | Health and social care | Hampshire County Council (hants.gov.uk). This JNSA data works at a more granular level and should also help reduce limitations and assumptions set out at 16.8. of the scoping document.

The health impacts of major development projects need to be considered to capture issues such as air and noise pollution, residents' mental health, active travel access, poor site/building design and impact on children's health, especially as elements of the scheme will be in close proximity to some urban areas and could also impact public access to the PROW network and open spaces along the pipeline route.

Construction effects and Operational effects - Areas Scoped Out

There are two sections under construction effects and operational effects (16.6.13 and 16.6.16) which have areas scoped out and it is the view of the County Council that these sections require further review.

Internal environments close to the project for example could easily be impacted upon by construction noise, dust, air pollution and other factors and as such should not be scoped out.

Public health issues such as social cohesion, social exclusion, lifestyle choices could also be hampered by elements of poor design, diverted PROW routes (see Appendix 7 of this consultation response) or hard-edged built elements of the scheme which create poorer environments for access and safety.

New vehicular access routes and entrances for industrial facilities / infrastructure for example can influence the walking and cycling environment and as such need considering. There is limited detail at this stage on the built form element of the project, so for example a large fenced off industrial building alongside a PROW which was previously open and overlooked will impact on the PROW users experience of that PROW. As such Public Health suggest these areas that are scoped out should be scoped in so that the full health impacts of the proposal are considered. This should also be amended in the table set out at 16.10.

Assessment Scenarios

At paragraph 16.7.20 the assessment scenario allows for a year of operation. This should be expanded to allow for known areas of regular maintenance which could be ongoing and typical for this kind of facility beyond the first year of operation especially where these activities have a possibility of impacting on the health and wellbeing of the local population.

The scoping statement narrowly defines health impacts as those arising directly from the construction and operational phases of the project which then potentially omits the longer-term effects of noise, odour and exhaust pollution associated with the scheme and how these issues can interact with community wellbeing and mental health.

Population and Health

The County Council welcomes an EIA which informs the protection of the health of residents, visitors, and workers within the proposed scoping red line of the project during construction as well as during the future operation of the plant and pipelines.

Whilst the scheme offers potential opportunity to create new and enhance the wider PROW network and access to open spaces alongside the pipeline route which would be a positive public health outcome, public health impacts and

outcomes from the project should also be considered across a wider geographic area beyond just the red line of the proposed DCO application.

Air Quality

No level of air pollution is a safe level of air pollution, and Hampshire Public Health recommends stringent prevention and management measures as part of this project. Hampshire Public Health therefore support the principle of scoping in air pollution in and around this geographic area as a public health priority.

The County Council would seek to ensure that the appropriate levels of air quality assessment work are carried out for the scheme itself and for the construction phases when issues of dust and disturbance will add to the impact on air quality. Climatic factors of wind and weather and in particular micro climate impacts on air particulate movement around the scheme and large excavation requirements also need to be factored in.

Particulates modelling should include PM10, PM2.5, Fine Particulates and those created from tyre abrasions should be included. The County council would also wish to ensure that the impact of construction and road management changes on the mental health, connectedness and wellbeing of nearby communities and vulnerable groups is included in any EIA assessment.

Noise, Odour and Vibration

Noise and vibration control measures during construction should be assessed, as set out in the Scoping Report. Hampshire Public Health encourage the applicant to mitigate this, and the operational noise of the completed scheme as far as is possible due to the effects on nearby residents, schools, places of worship as well as healthcare and other facilities. The impacts of prolonged exposure to noise and odour have been evidenced by the World Health Organisation and the local environmental health teams will need to be satisfied that the impacts of the scheme during construction and in its operational phase are at an acceptable level based on the evidence and modelling carried out.

Design Impacts of WTP and Pipeline Routes

At this stage, the full impacts of the buildings, above ground plant, pipelines, maintenance facilities, and security and access requirements for this proposal are not clear. Water treatment and recycling plants within an urban context are not synonymous with creating inclusive and accessible built form and are often designed to turn their back on spaces, footpaths and public access. Hampshire Public Health would therefore recommend that a section of the scoping document should seek to assess the built form design element of the scheme at an early stage.

Appendix 7- Public Rights of Way (PROW)

The PROW network and the impacts to users (pedestrians, cyclists and equestrians), in regards to delay and safety, are scoped into the proposed EIA. These are identified in sections 16 (Socio-economics, tourism, recreation and health) and 17 (Traffic and transport).

- Safety issues are scoped in for construction and scoped out for operation.
- Delay issues are scoped in for construction and operation phases.

There is notable scope for the project to positively impact the PROW network and public access to the countryside. The route of the pipeline runs across a significant part of green Hampshire, and particularly where trench cut installation is proposed, the ground and surface will need to be restored. This gives scope for the route to incorporate new public rights of way running along the length of the restored route. For example, establishing an entirely new route; a collection of new short routes; or enhancements and/or diversions for existing PROW.

The scheme could also provide benefits with enhancements to the existing local network, with surface repairs, improving access and signage, as well an improving crossing points at roads to enhance public safety.

There are a number of proposed compounds for the project that impact on the existing PROW network. Numerous compounds are proposed to locate directly over a PROW, others have site access that would share the route of public access to PROW. Each of these cases needs careful consideration – to ensure public safety and manage suitable diversions of the PROW route around compounds, consideration of alternative access routes, and similar mitigation and obligations. This includes carrying out the expected notification to the highways Regulation for any works, closures, or diversions, including temporary ones, with the Highways Authority, in regards to the PROW network, to ensure correct public notification and allow for the Definitive map to be maintained.

All the above will need to be in collaboration with the relevant landowners, Hampshire Countryside Service [the Highways Authority, in regards to the PROW network, PROW interest groups, Parish Councils, and other relevant stakeholders. Any impacts to PROW, such as temporary closures and diversions must be done in a phased manner to minimise inconvenience to the public.

The applicant should work with authorities to create a single document, and/or location, of all information relating to the PROW network to aid public communication. This would allow users of the network to understand the location and duration of works to be able to plan routes in advance of using

the network to achieve successful and enjoyable navigation of the PROW network.

The County Council supports scoping in impacts on the PROW network, and consideration of cyclists, pedestrians, and equestrians on the PROW and road networks. To summarise:

- Safety aspects regarding PROW and their users are an issue for the construction phase and can be scoped out for the operational phase.
- Diversion/delay impacts should be scoped in for both construction and operation phases;
- Environmental topics, such as air quality, dust, ground conditions, land use, drainage, and noise, should all consider the PROW network as a sensitive receptor for assessment. The PROW network is not mentioned in many of these topics and yet these are public infrastructure upon which the public will be in close proximity to works. This is particularly notable for the construction period. The cumulative impact on PROW users could be significant to their safety, convenience, as well as their amenity, when using the network.
- Staunton County Park (Middle Park Way in Havant) is the sole Hampshire Countryside Service managed site within the corridor for the pipeline. Suitable consideration for this site, its biodiversity, landscape, management, business, tourism/leisure, onsite PROW, and other infrastructure, will be included within the Scoped in topics of the report.

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Direct line: [redacted]
Email: planning.development@havant.gov.uk
My reference: GEN/22/00662
Your reference: WA010002-000010-230725
Date: 22 August 2023

Dear Ms Shoesmith,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by Southern Water Services Limited (the Applicant) for an Order granting Development Consent for the Hampshire Water Transfer and Water Recycling Project (the Proposed Development)

Consultation Response from Havant Borough Council and East Hampshire District Council

I write in response to your letter dated 25th July 2023. Thank you for consulting Havant Borough Council and East Hampshire District Council on the EIA Scoping Report for the Hampshire Water Transfer and Water Recycling Project by Southern Water. The proposed Water Recycling Plant (WRP), Havant Thicket Reservoir, connection to Budds Farm Waste Water Treatment Works and sections of the pipeline all lie within Havant Borough. The northern extent of the Havant Thicket Reservoir lies within East Hampshire District Council's jurisdiction.

Havant Borough Council is mindful of significant concern in the community about the principle of waste water recycling and the specific proposal itself. Indeed, the local authority share a number of concerns and feels it to be crucial that the details of the proposal and its environmental, social and economic effects are fully understood before the Development Consent Order process is concluded given the likely irreversibility of the proposal. The Council also considers that the communities affected by this proposal are involved in the development of the proposal and able to have meaningful and ongoing input at the pre-application stage and again during the examination stage of the application.

The EIA process provides an important opportunity for the effects of the proposal to be considered in detail, and it is therefore vital that a precautionary approach is taken and matters are not screened out of the process too early.

Havant Borough Council (also acting on behalf of East Hampshire District Council on this matter) wish to make the following comments on the applicant's EIA Scoping report. Please note that these

are made without prejudice to any views either council may wish to express on the scheme and its effects as further detailed information becomes available.

General Comments

- Detail is missing on project timeline and years for likely construction; it is understood that this will be provided at a later date. Assessment scenarios and baseline years for certain assessments may need to be revised to ensure most up to date data is utilised.
- We have a general appreciation that detail is not available on some of the above ground plant and construction compound locations; we expect to see full assessment of these elements in the Preliminary Environmental Information Report (PEIR) / Environmental Statement (ES).
- The Scoping Report states that the impacts of decommissioning would be no worse than the impacts of construction, however if the project has a lifecycle of 100 years, we feel it is not possible to determine what the impacts of decommissioning would be. As we are in a climate emergency, receptors may be more sensitive to impact in 100 years, as such we would recommend assessment of decommissioning occurs nearer the time.
- We expect to see an outline construction environmental management plan or code of construction practice to be submitted with the PEIR / ES to include mitigation measures prescribed by the environmental assessments.
- We welcome the inclusion of primary mitigation during the design process to avoid negative effects (see in particular further detailed comments on contaminated land below).
- Section 4 on the Consideration of alternatives within the EIA Scoping report is unclear. Further details of environmental impacts of the alternatives to water recycling should be detailed within the PEIR / ES, so that the benefits and drawbacks of all the alternatives can be clearly understood without reliance on documentation from earlier options appraisals stages.
- The assessments within the PEIR / ES should assess the impact of the second phase of water transfer at 80Ml/d for a worst case scenario.
- Any upgrades needed to Otterbourne Water Supply Works and other existing infrastructure outside of routine maintenance should also form part of the assessments as essential elements of the scheme.

Air Quality and Odour

- We are satisfied with topics scoped in and out, with the exception of the impacts of odour from the landfill site where the proposed water treatment plant is to be located. Stronger justification is required in order to satisfactorily scope out this topic from further assessment. The Council considers that to rely on the work prepared for the consented employment scheme on the same site is insufficient, given the differences between the proposals (eg addition of underground pipework).

Archaeology and Cultural Heritage

- We agree with the methodology and that further investigation and consultation is required to refine the archaeological and heritage settings and assessment.

Terrestrial and freshwater biodiversity and Marine Biodiversity

- We appreciate that given the inherent uncertainties in the precise location of some aspects of the proposed works and the construction methodologies, proposals for mitigation measures are outline at this stage.
- We are content that the scope of ecological surveys and the methods of valuation and impact assessment are appropriate.

- It should be noted that Havant Borough Council is not part of the Hampshire District Level License scheme for Great Crested Newt and therefore alternative mitigation measures, and potentially bespoke survey efforts, may be necessary for any identified impacts to Great Crested Newt within Havant Borough. East Hampshire District Council is also not part of the Hampshire District Level License scheme for Great Crested Newt so similar consideration would need to be made.

Carbon and climate change

- We agree with the general methodology, but we would like to emphasise the importance of assessment of future flood impacts / sea level rise on the site for the proposed water recycling plant. This is of particular concern due to the location and contaminated nature of the site.
- In this regard, although the preferred site for the WRP is located outside the area of most concern, the applicant should note that the condition of the sea defences at Broadmarsh Coastal Park are reaching the end of their serviceable life. There is significant uncertainty around their future, as the land comprises historic landfill and therefore is not eligible for Central Government funding for ongoing maintenance or construction of new defences.

Land quality and ground conditions

- We agree with the general methodology and the elements of the assessment to be scoped in and out.
- With reference to Table 11.3 the proposed buffers consider all search distances the same for development type - underground pipeline, WRP and above ground plant. Development type should be separated and buffers made more bespoke to development type, as different types of development have a different extent of impacts.
- Baseline data for the PEIR should be updated to include mineral safeguarding areas.
- Additional datasets for desk based assessment for the PEIR should include any previous site investigation works and monitoring.
- With reference to section 11.10 we are significantly concerned with the proposed construction of the WRP on top of landfill. If the preferred site is to be progressed, it will need to be extremely carefully designed to prevent creation of additional pathways/ gas migration, issues of settlement. There are previous planning applications and site investigations for this landfill which should be reviewed - specifically with regard to asbestos within the cover system and waste and the hydrogeological conceptual site model.
- As mentioned in the general comments above, given the significant concern around land contamination at the preferred site for the WRP, we welcome the inclusion at paragraph 11.9.2 of the principle of considering alternative locations for the plant as potential primary mitigation.
- The risk of pathway creation associated with construction activity has not been considered, i.e. the increase in landfill leachate flux that might arise at the preferred WRP site from the failure of a pipeline seal-, a failure of pipeline integrity-, which could be caused by continued degradation of the waste body and the consequential settlement of the fill. This might affect pipelines brought up through the base of the landfill or penetrating the bund structure.
- In relation to Table 11-13 we feel that a material increase in leachate flux could lead to a major effect. The effects of an increase in leachate should also be assessed on other relevant receptors including water quality, ecology and human health.
- This chapter acknowledges limitations of desk top information, and that further refinements and information are required. Further investigation will be necessary once the location of the temporary construction hub is known and also the design is finalised.

Land use and agriculture

- The chapter acknowledges the potential for access disruption during scheme construction to areas outside the application boundary. The applicant must ensure careful consideration is given to impacts on access to developments, residents and businesses once the final design is understood. The temporary construction hub location will also need to be assessed once location is known.
- The impacts from vibration tunnelling under residential properties in built up areas are a key concern for the Council. The assessment of impacts should acknowledge that these are dependent on geology, structural integrity of properties etc. Utilities will also be a consideration.
- There should be a clear distinction between impacts of above ground plant, WRP and high lift pumping stations on community facilities and land.
- 'Impacts to land used for Wickham Festival' is noted in paragraph 12.5.29 but has not been identified in the baseline.
- Decommissioning should be reassessed at its end time given land use changes over time.
- Given the importance of soil as a valuable resource we would expect further evidence before this can be scoped out. We query if the ground investigations provide adequate evidence for all potential areas of impact. Soil surveys should be considered on land which will be temporarily impacted during construction to allow for adequate mitigation/restoration.

Landscape and visual impact

- The figures provide Zones of Theoretical Visibility for 3km and up to 5km, however it is unclear to where the reference for viewpoints up to 5km are.
- It is noted that the viewpoints for visual receptors are subject to change and are to be confirmed following receipt of feedback from stakeholders. The Councils will work with the applicant to identify viewpoints.
- The construction hub will require assessment once its location is known.
- Acknowledge further photography is required to complete the seasonal photomontages.
- We would expect to see consideration of any loss of green infrastructure as a whole across the scoping area and its impact on canopy cover, ecosystem services and green corridors - this would also be linked with biodiversity and water environment.
- Scoping should acknowledge that there could be an interaction between the design implications of mitigation measures, and the landscape & visual assessment. For example, the solution to settlement or gas migration risks could conceivably include the need to 'overground' pipes. Assessments relating to a variety of matters will need to consider the evolving design and respond to material changes.
- Agree further identification of significant effects on receptors is required through detailed analysis and stakeholder consultation.

Noise and Vibration

- We welcome the inclusion of an assessment of the construction hub and an assessment of noise during operation.
- Assessment of vibration on properties being tunnelled under will be a very important consideration. (see also comments on land use and on cumulative effects)
- The Council expects noise and vibration impacts to be avoided or mitigated to the highest degree to minimise impacts on residents and businesses

Resource and Waste Management

- Overall, we are in agreement with the methodology proposed, however Table 15.3 should acknowledge that further materials may be required in the pipeline laying due to potential sand and gravel extraction in Materials Safeguarding Area. It would also be useful to provide predicted quantities of material consumption within Table 15.6 to allow for a comparison as to the potential impact of material resource use from the proposed development to give confidence in this being scoped out of the assessment.
- As stated elsewhere, decommissioning would require further assessment as infrastructure capacity could be markedly different at this point in time.

Socio-economics, tourism, recreation and health

- We support that the assessment will consider the potential direct and indirect effects of the proposed Development for the economy, businesses and strategic tourism receptors in the study area during construction and operation; Any impacts on Havant and East Hampshire as a visitor destination should be fully understood, given the importance of visitors to the local economy.
- Havant Borough Council have concerns with regard to the loss of employment land on the proposed WRP site. We do not consider that it is possible to conclude no net loss of employment until the numbers of FTE jobs created can be compared for the WRP and the consented scheme on the site. We disagree that this is a construction effect as the construction phase will employ far greater numbers of people than in operation.
- Tourist accommodation data is incomplete / out of date - no inclusion of AirBnB or equivalent as far as could be identified.
- We disagree with the health assessment on construction workers being scoped out at this stage - due to the level of contamination at the proposed WRP site and the unknown nature of construction hub / compounds this should be scoped in. Previous assessments for the site identified asbestos within the landfill material and therefore a precautionary approach should be taken and this matter scoped in (see also commentary on contaminated land).
- Additionally disagree with the scoping out of access to open spaces and nature, accessibility and active travel under the health assessments during operation when permanent changes to Public Rights of Way are unknown at this stage; the effects that the scheme may have on the Havant Thicket Reservoir as an access to nature and leisure resource for the local community also need to be understood.

Traffic and Transport

- Would expect the PEIR / ES to follow IEMA 2023 Environmental Assessment of Traffic and Movement guidance and therefore the rationale for scoping topics in and out may need to be revisited.
- Strava analysis for Public Rights of Way usage data has limitations which should be taken into account i.e. excludes more casual Public Rights of Way users and those who do not use the Strava service.

Water environment

- We are in general agreement with the methodology proposed. We support in particular the scoping in of effects on water bodies during operation; The Councils maintain a general concern about the effects of the water recycling process, in particular on the water in the Havant Thicket Reservoir and Coastal Waters. Changes to water quality as a result of the

introduction of recycled water to the Havant Thicket Reservoir, and of reject water from the recycling process being discharged via the Eastney LSO need to be fully understood.

- Please also note commentary on leachates above
- All sources of flood risk should be assessed in detail for construction and operation. Please note commentary on sea defences in the vicinity of the preferred WRP site under climate change above.

Cumulative effects assessment

- We broadly agree with the methodology and use of PINS Advice Note 17. The applicant should ensure that EIA cumulative schemes are consistent with HRA and Transport Assessment cumulative assessments.
- However, the Councils particularly wish to highlight the need for the EIA to consider the interaction between the proposed scheme and the Havant Thicket Reservoir approved under Havant Planning Application ref APP/20/00990 and East Hampshire ref 51680/001, given the direct connectivity between the schemes. This should include:
    - Consideration of in combination effects during construction and operation
    - Consideration of how appropriate management of both schemes during construction and operation can minimise negative effects and maximise positive ones (eg options around combined or separate pipeline routing and construction timings and methods).
    - Consideration of the effects of the scheme on the Havant Thicket Reservoir as permitted, including assessment of any changes to the benefits anticipated from the Havant Thicket Reservoir, such as habitat creation, reduced nitrogen load downstream and visitor access.

Topics to be scoped out

- Major accidents and disasters –
    - Annex A of Volume II (Risk identification screening) states that there is potential for major accidents and/or disasters for chemical explosions during operation even with mitigation in place. This is in contradiction to section 20.2.10 which says there is no source-pathway-receptor linkage. We would expect to see further detail before it can be scoped out.
    - We also would expect to see the scoping in of major accidents and disasters on the basis of development on and within an actively gassing landfill site with a high proportion of poorly degraded wastes. There is a risk of accumulating flammable and explosive air mixtures within service ducts, shafts and chambers – within which electrical plant and equipment is likely to be housed. There is a risk of explosion/fire impacting the development, but also a secondary risk of igniting a below-ground landfill fire across the wider site. Such fires are typically difficult to manage, and we would assume risks of damaging any buried development infrastructure, creating pathways, and altering either leachate flux, or contaminant flux. It is assumed that such risks will require detailed secondary mitigation, and as such, should be scoped in.
    - We question why the definition of flooding on page 208 of Volume II does not expressly include tidal or fluvial flooding, and therefore whether these have been / will be adequately assessed
- Shipping and navigation – No comments with the exception that scoping this topic out would need to be reconsidered if deliveries are to be made by water.
- Coastal and marine processes – Agree with scoping out unless works are to be undertaken at the shoreline where impacts on coastal processes would need to be assessed. We note the

proposed locations for the Eastney Transfer Tunnel and the Eastney Long Sea Outfall. Subsequent impacts on the construction of the North Portsea Island Flood & Coastal Erosion Risk Management Scheme should be considered and avoided.

- Other marine users – Agree with scoping out.
- Heat and Radiation – Agree with scoping out.

We trust these comments are of assistance.

Yours sincerely

Alex Robinson
Executive Head of Place
Havant Borough Council

Historic England

Direct Dial: [redacted]

[redacted]
The Planning Inspectorate
Environmental Services, Operations Group 3
Temple Quay House, 2 The Square
Bristol
BS1 6PN

Our ref: PL00793634

21 August 2023

Dear Sir/Madam

HAMPSHIRE WATER TRANSFER AND WATER RECYCLING PROJECT ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCOPING REPORT

Thank you for your letter of **25 July 2023** consulting us about the above EIA Scoping Report.

This development could, potentially, have an impact upon a number of designated heritage assets and their settings in the area around the site. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

We would also expect the Environmental Statement to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This information is available via the local authority Historic Environment Record (www.heritagegateway.org.uk) and relevant local authority staff.

We would strongly recommend that you involve the Conservation Officers of relevant local authorities and the archaeological staff at Hampshire County Council in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Given the wide-ranging nature of the proposed development and the surrounding landscape character, elements of the scheme could be visible across a very large

area and may, as a result, affect the significance of heritage assets at some distance from this site itself. We would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed.

It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to *in situ* decomposition or destruction of below ground archaeological remains and deposits and can also lead to subsidence of buildings and monuments.

In addition to the above, we have the following specific comments to make regarding the content of the Scoping Report:

- The title of the chapter addressing the historic environment is somewhat misleading and erroneously makes a distinction between archaeology and cultural heritage. A more appropriate title would be Archaeology and Built Heritage.
- The section of National Policy (7.2.3) should include DCMS policy on Scheduled Monuments (2013). This sets out Government policy on the identification, protection, conservation and investigation of nationally important sites and buildings for the benefit of current and future generations. It notes that in addition to their intrinsic value, scheduled monuments can contribute to our perceptions of cultural identity and provide unique opportunities for research, education, leisure and tourism, delivering social benefits and contributing to economic growth. Paragraph 20 states that, in cases including works proposed for development-, conservation- or presentation-related purposes, the Secretary of State has particular regard to the principles contained in the National Policy Planning Framework.
- Table 7-1 on relevant local policy refers to the Portsmouth Local Plan at Regulation 18 stage from 2021, but not the Winchester Local Plan Regulation 18 stage from 2022. For completeness reference could/should also be made to the more recent draft plan from Winchester City Council. We would note that Sections 1.7 and 1.8 of Appendix 1 cover this adequately.
- The baseline data (i.e: Table 7-3) should refer to Heritage at Risk register. This would have relevance in relation to a number of designated heritage

assets, such as Fort Widley, Fort Southwick and Brambridge House near Ottorborne.

- Table 7-4 needs to be clearer on where RPG's of different grades are ranked in the level of importance. We would suggest same approach to Listed Buildings is taken.
- There is no indication of the level of significance for RPGs in Figure 7.1, Volume III for Leigh Park RPG (GII*) (sheet 1 of 8) or Cranberry Park RPG (GII*) (sheet 6 of 8). Figure 13.1 in Vol III also does not distinguish between different grades of RPG.
- Southwick Conservation Area appears to be missing from Figure 7.1. Also, this CA is on the heritage at risk register.
- The relationship between scoping areas defined in paragraphs 7.4.1 and 7.4.2 is unclear. We infer this relates to previous advice to ensure the impact assessment includes setting within its consideration. However, the wording here suggests two studies - one a broader impact assessment within 1km (that includes setting) and one a setting study within 3km. This should be clarified, including a clearer summary of the reasoning for the broader impact assessment in 7.4.1.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely,

Iain Bright
Inspector of Ancient Monuments
[redacted]@HistoricEngland.org.uk

Sam Chudley
Maritime and Coastguard Agency
Bay 2/24
Spring Place
105 Commercial Road
Southampton
SO15 1EG

www.gov.uk/mca

Your Ref: WA010002

22/08/2023

Via email: HampshireWaterProject@planninginspectorate.gov.uk

Dear Laura,

Hampshire Water Transfer and Water Recycling Project

Thank you for the opportunity to comment on the Hampshire Water Transfer and Water Recycling Project EIA Scoping Consultation.

The MCA a is statutory consultee on any works taking place below the MHWS within the marine environment. Representatives of the UK Technical Services Navigation team have reviewed the documentation provided and note that shipping and navigation has been scoped out because the infrastructure which sits in the marine environment is the Budds Farm WTW outfall and the Eastney Transfer Tunnel, and it is our understanding that these are existing features already in situ and there are no proposals to change/modify these as a result of the proposed works. In addition, we understand that any delivery of construction materials that may occur by shipping methods will be undertaken with consultation with the relevant Harbour Authorities. As stated below:

20.3 Shipping and navigation

20.3.1 This section outlines the relevance of the topic of shipping and navigation to the Proposed Development and the justification for scoping it out of further assessment. This topic includes receptors such as commercial vessels (including cargo, tanker and passenger vessels), recreational users (such as yachts, power boats and recreational anglers), fishing vessels and other offshore users (such as pilot boats, support vessels, dredgers and Search and Rescue (SAR) vessels).

Baseline

20.3.2 No works are anticipated to take place with direct connection to the marine aquatic environment. Subterranean tunnelling underneath the seabed would not have connection with the water column. Therefore there is no pathway for effect during construction. Furthermore, no works are taking place in the operational phase and therefore there is no pathway for effect to shipping and navigation receptors. Therefore, baseline conditions are not detailed further in this section. Potential likely significant effects Likely significant effects during construction

20.3.3 In the case of the Proposed Development, works are not anticipated within the marine environment and materials for construction are proposed to be delivered to site via road, as such, there is no anticipated impact pathway. It is therefore considered that there are unlikely to be effects (including significant effects) upon shipping and navigation as a consequence of the Proposed Development.

20.3.4 It is noted that the potential for transit of some construction materials to port is yet to be determined. Should materials be delivered by marine vessel during construction, this would require delivery to either the Port of Southampton or the Port of Portsmouth, with the final stage being transported to site by road. If required, such movements will be managed via existing port procedures. Under this scenario, consultation will be undertaken with the relevant Harbour Authority to ensure that the transport of materials can be accommodated in line with the port's existing Marine Safety Management System (MSMS). Likely significant effects during operation

20.3.5 Operation of the Proposed Development will not require transportation of materials by vessel. As the Proposed Development does not comprise any permanent infrastructure in the marine environment, no collision risk or displacement activities are anticipated. Therefore, operational shipping and navigation effects during operation are proposed to be scoped out for further consideration. Summary 20.3.6 There is no impact pathway and as such, the shipping and navigation topic is proposed to be scoped out from further consideration.

On this basis, the MCA can confirm there are no comments to add at this stage, however the MCA would expect any works below the MHWL to be considered under the Marine and Coastal Access 2009 with regards to marine licensing and consideration given to any potential impact on other marine users as the project progresses. It is likely that risks can be suitably mitigated at the formal marine licencing application stage.

Yours sincerely,

[redacted]

Sam Chudley
Maritime Licence Advisor
UK Technical Services Navigation

Marine Management Organisation

Marine Licensing
Lancaster House
Hampshire Court
Newcastle upon Tyne
NE4 7YH

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Ms Laura Feekins-Bate
Senior EIA Advisor
The Hampshire Water Project Case Team
National Infrastructure Planning
HampshireWaterProject@planninginspectorate.gov.uk
(Email only)
By email only

Our reference: DCO/2020/00003

21 August 2023

Dear Ms Feekins-Bate,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11: Hampshire Water Project EIA Scoping Report Consultation

Thank you for your Scoping consultation dated 23 July 2023 on the above project.

The MMO's role in Nationally Significant Infrastructure Projects

The MMO was established by the Marine and Coastal Access Act 2009 (the "2009 Act") to contribute to sustainable development in the marine area and to promote clean, healthy, safe, productive and biologically diverse oceans and seas. The responsibilities of the MMO include the licensing of construction works, deposits and removals in English inshore and offshore waters and for Welsh and Northern Ireland offshore waters by way of a marine licence[1]. Inshore waters include any area which is submerged at mean high water spring ("MHWS") tide. They also include the waters of every estuary, river or channel where the tide flows at MHWS tide. Waters in areas which are closed permanently or intermittently by a lock or other artificial means against the regular action of the tide are included, where seawater flows into or out from the area. In the case of Nationally Significant Infrastructure Projects ("NSIPs"), the 2008 Act enables Development Consent Order's ("DCO") for projects which affect the marine environment to include provisions which deem marine licences[2].

As a prescribed consultee under the 2008 Act, the MMO advises developers during preapplication on those aspects of a project that may have an impact on the marine area or those who use it. In addition to considering the impacts of any construction, deposit or removal within the marine area, this also includes assessing any risks to human health, other legitimate uses of the sea and any potential impacts on the marine environment from terrestrial works. Where a marine licence is deemed within a DCO, the MMO is the delivery body responsible for post-consent monitoring, variation, enforcement and revocation of provisions relating to the marine environment. As such, the MMO has a keen interest in ensuring that provisions drafted in a deemed marine licence ("dML") enable the MMO to fulfil these obligations. Further information on licensable activities can be found on

[1] Under Part 4 of the 2009 Act
[2] Section 149A of the 2008 Act

the MMO's website[3]. Further information on the interaction between the Planning Inspectorate and the MMO can be found in our joint advice note[4].

Please find attached our formal response to the consultation request. As advised in my email dated 15 August 2023, due to a significant delay by the applicant in accepting our fee estimate, the MMO has not been able to undertake a detailed review of the Scoping Report.

The MMO reserves the right to make further comments on the project, including further comments on the Scoping report, throughout the pre-application process and may modify its present advice or opinion in view of any additional information that may come to our attention. This representation is also submitted without prejudice to any decision the MMO may make on any associated application for consent, permission, approval or any other type of authorisation submitted to the MMO either for the works in the marine area or for any other authorisation relevant to the proposed development.

If you require any further information, please do not hesitate to contact me using the details provided below.

Yours sincerely

[redacted]

Mark Qureshi
Marine Licensing Case Manager

D [redacted]
E [redacted]@marinemanagement.org.uk

[3] https://www.gov.uk/planning-development/marine-licences
[4] https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2013/04/Advice-note-11-Annex3-MMO.pdf

Scoping consultation response

Title: Hampshire Water Transfer and Water Recycling Project

Applicant: Southern Water Services Limited

MMO Reference: DCO/2020/00003

Please be aware that any works within the Marine area require a licence from the Marine Management Organisation (MMO). It is down to the applicant themselves to take the necessary steps to ascertain whether their works will fall below the Mean High Water Springs mark.

The MMO is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.

Marine Licensing
Works activities taking place below the mean high-water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009.

Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence.

Applicants should be directed to the MMO's online portal to register for an application for marine licence.

https://www.gov.uk/guidance/make-a-marine-licence-application

You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in English waters.

The MMO is also the authority responsible for processing and determining Harbour Orders in England, together with granting consent under various local Acts and orders regarding harbours.

A wildlife licence is also required for activities that that would affect a UK or European protected marine species.

The MMO is a signatory to the coastal concordat and operates in accordance with its principles. Should the activities subject to planning permission meet the above criteria then the applicant should be directed to the follow pages: check if you need a marine licence and asked to quote the following information on any resultant marine licence application:

- local planning authority name,
- planning officer name and contact details,
- planning application reference.

Following submission of a marine licence application a case team will be in touch with the relevant planning officer to discuss next steps.

Environmental Impact Assessment

With respect to projects that require a marine licence the EIA Directive (codified in Directive 2011/92/EU) is transposed into UK law by the Marine Works (Environmental Impact Assessment) Regulations 2007 (the MWR), as amended. Before a marine licence can be granted for projects that require EIA, MMO must ensure that applications for a marine licence are compliant with the MWR.

In cases where a project requires both a marine licence and terrestrial planning permission, both the MWR and The Town and Country Planning (Environmental Impact Assessment) Regulations http://www.legislation.gov.uk/uksi/2017/571/contents/made may be applicable.

If this consultation request relates to a project capable of falling within either set of EIA regulations, then it is advised that the applicant submit a request directly to the MMO to ensure any requirements under the MWR are considered adequately at the following link

https://www.gov.uk/guidance/make-a-marine-licence-application

Marine Planning

Under the Marine and Coastal Access Act 2009 ch.4, 58, public authorities must make decisions in accordance with marine policy documents and if it takes a decision that is against these policies it must state its reasons. MMO as such are responsible for implementing the relevant Marine Plans for their area, through existing regulatory and decision-making processes.

Marine plans will inform and guide decision makers on development in marine and coastal areas. Proposals should conform with all relevant policies, taking account of economic, environmental and social considerations. Marine plans are a statutory consideration for public authorities with decision making functions.

At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark.

A map showing how England's waters have been split into 6 marine plan areas is available on our website. For further information on how to apply the marine plans please visit our Explore Marine Plans service.

Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service soundness self-assessment checklist. If you wish to contact your local marine planning officer you can find their details on our gov.uk page.

Minerals and waste plans and local aggregate assessments
If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below;

- The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry.
- The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.
- The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply.

The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.

If you require further guidance on the Marine Licencing process, please follow the link https://www.gov.uk/topic/planning-development/marine-licences

Feekins-Bate, Laura

From: .Box.Assetprotection (National Gas) <box.assetprotection@nationalgas.com>
Sent: 26 July 2023 13:48
To: Hampshire Water Project
Subject: RE: [EXTERNAL] WA010002 - Hampshire Water Transfer and Water Recycling Project - EIA Scoping Notification and Consultation

Good afternoon,,

Thank you for your email.

Regarding planning application WA010002, there are no National Gas Transmission assets affected in this area.

If you would like to view if there are any other affected assets in this area, please raise an enquiry with www.lsbud.co.uk. Additionally, if the location or works type changes, please raise an enquiry.

Kind regards

Asset Protection Team

From: Hampshire Water Project <HampshireWaterProject@planninginspectorate.gov.uk>
Sent: 25 July 2023 11:34
To: .Box.Assetprotection (National Gas) <box.assetprotection@nationalgas.com>
Cc: Hampshire Water Project <HampshireWaterProject@planninginspectorate.gov.uk>; Kamille Liddar (National Gas) [redacted]@nationalgas.com>
Subject: [EXTERNAL] WA010002 - Hampshire Water Transfer and Water Recycling Project - EIA Scoping Notification and Consultation

Dear Sir / Madam

Please see attached correspondence on the proposed Hampshire Water Transfer and Water Recycling project.

Please note that the deadline for consultation responses is **22 August 2023**, and is a statutory requirement that cannot be extended.

Kind regards
Laura

The Planning Inspectorate

Laura Feekins-Bate
Senior EIA Advisor
The Planning Inspectorate

@PINSgov The Planning Inspectorate planninginspectorate.gov.uk

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DPC:76616c646f72

National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

Complex Land Rights
Ellie Laycock
Development Liaison Officer
UK Land and Property
[redacted]@nationalgrid.com
Tel: +44 [redacted]

www.nationalgrid.com

SUBMITTED ELECTRONICALLY:
hampshirewaterproject@planninginspectorate.gov.uk

14 August 2023

Dear Sir/Madam

APPLICATION BY SOUTHERN WATER SERVICES LIMITED (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE HAMPSHIRE WATER TRANSFER AND WATER RECYCLING PROJECT (THE PROPOSED DEVELOPMENT)

SCOPING CONSULTATION RESPONSE

I refer to your letter dated 25th July 2023 in relation to the above proposed application. This is a response on behalf of National Grid Electricity Transmission PLC (NGET). Having reviewed the scoping report, I would like to make the following comments regarding NGET infrastructure within or in close proximity to the current red line boundary.

NGET has high voltage electricity overhead transmission lines within the scoping area. The overhead lines form an essential part of the electricity transmission network in England and Wales.

Overhead Lines

4YE 400kV OHL	Botley Wood – Lovedean
	Fawley – Lovedean
4YC 400kV OHL	Lovedean – Mannington – Nursling
	Lovedean – Nursling

I enclose a plan showing the location of NGET's apparatus in the scoping area.

National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

Specific Comments – Electricity Infrastructure:

- NGET's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset

- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. NGET recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for "overhead line clearances Issue 3 (2004)".

- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.

- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance.

- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum "sag" and "swing" and overhead line profile (maximum "sag" and "swing") drawings should be obtained using the contact details above.

- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.

- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or "pillars of support" of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation ("pillar of support") drawings can be obtained using the contact details above.

- NGET high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide NGET full right of access to retain, maintain, repair and inspect our assets. Hence we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with NGET prior to any works taking place.

- Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

To download a copy of the HSE Guidance HS(G)47, please use the following link:
http://www.hse.gov.uk/pubns/books/hsg47.htm

Further Advice

We would request that the potential impact of the proposed scheme on NGET's existing assets as set out above and including any proposed diversions is considered in any subsequent reports, including in the Environmental Statement, and as part of any subsequent application.

Where any diversion of apparatus may be required to facilitate a scheme, NGET is unable to give any certainty with the regard to diversions until such time as adequate conceptual design studies have been undertaken by NGET. Further information relating to this can be obtained by contacting the email address below.

Where the promoter intends to acquire land, extinguish rights, or interfere with any of NGET apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO.

NGET requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: **box.landandacquisitions@nationalgrid.com**

I hope the above information is useful. If you require any further information, please do not hesitate to contact me.

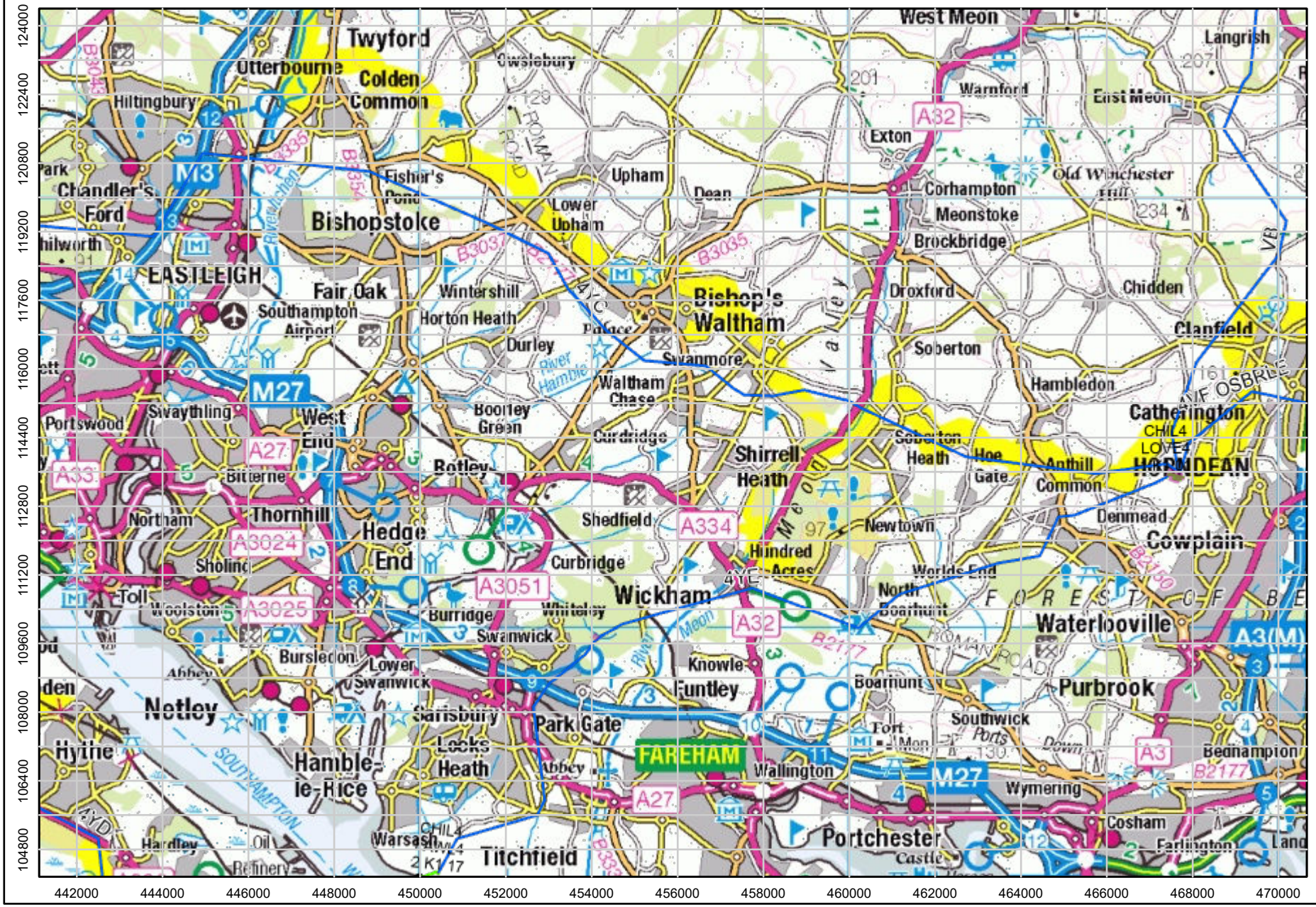
The information in this letter is provided not withstanding any discussions taking place in relation to connections with electricity customer services.

Yours faithfully

[redacted]

Ellie Laycock
Development Liaison Officer, Complex Land Rights

nationalgrid | National Grid Web Map



Legend

ET ASSETS

Cable Tunnel

Buried Cable

Buried Cable Commissioned

OHL 400Kv

OHL 400Kv Commissioned

Substations

Substations Commissioned

Notes

0 0.4 0.8 1.6 2.4 3.2 km

Date: 8/14/2023
Time: 9:17 AM

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Feekins-Bate, Laura

From: NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Sent: 01 August 2023 14:37
To: Hampshire Water Project
Subject: RE: WA010002 - Hampshire Water Transfer and Water Recycling Project - EIA Scoping Notification and Consultation [SG35829]

Our Ref: SG35829

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

NATS Public

From: Hampshire Water Project <HampshireWaterProject@planninginspectorate.gov.uk>
Sent: 25 July 2023 11:08
Cc: Hampshire Water Project <HampshireWaterProject@planninginspectorate.gov.uk>
Subject: WA010002 - Hampshire Water Transfer and Water Recycling Project - EIA Scoping Notification and Consultation

Dear Sir / Madam

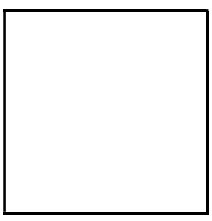
Please see attached correspondence on the proposed Hampshire Water Transfer and Water Recycling project.

Please note that the deadline for consultation responses is **22 August 2023**, and is a statutory requirement that cannot be extended.

Kind regards
Laura

The Planning Inspectorate

Laura Feekins-Bate
Senior EIA Advisor
The Planning Inspectorate



Date: 17 August 2023
Our ref: 443258
Your ref: WA010002

Marie Shoesmith
Planning Inspectorate

BY EMAIL ONLY

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

Dear Marie,

Environmental Impact Assessment Scoping consultation under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulation 11

Proposal: Hampshire Water Transfer & Water Recycling Project

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 24 July 2023, received on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities, based on relevant and up to date environmental information, should be undertaken prior to an application for a Development Consent Order. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

Pre-application engagement

Natural England is regularly engaging with the Southern Water project team on this scheme to ensure environmental concerns are addressed. This engagement will continue going forward, regular meetings are scheduled for this. Natural England are also an advisory body to RAPID (Regulator's Alliance for Progressing Infrastructure Development) for which this project is also part of, we have engaged in each of the gated sessions for this scheme.

Natural England's pre-application engagement has focused on, but was not limited to, the scheme design, pipeline route location and the discharge point via the Eastney Long Sea Outfall (LSO) and the associated designated sites impacts. Natural England are working with the applicant to the address environmental issues associated with this scheme, some of which still need addressing.

Areas of environmental concern include the pipeline river crossings and the associated impacts, especially those of the River Itchen SAC, the River Meon and the River Hamble. Natural England attended a site visit pre-application to discuss this further and continue to work with this company to address concerns around these crossings. Further survey data is needed to fully assess the impacts on river crossings across the pipeline route, where the applicant has not already done so. This has been discussed with the applicant pre-

application. The following has also been discussed with the applicant, all river crossings should utilise trenchless methods for construction to minimise the environmental impacts, hydrological assessments will also be needed prior to work starting.

Discussions have been held and further are needed on the proposed site of the water recycling plant, which is on a site of a historic landfill. Investigations into this site are ongoing. Any works on this site will need ensure an environmental impact does not occur to the designated sites within the vicinity, as a result of works taking place on this site, which could release leachates from the waste present. Future investigations should include leaching and flow pathways through the landfill site, including the presence of historic watercourse channels.

Advice has also been given on the waste stream and discharge for this scheme via the Eastney LSO and impacts this could have on the interest features of the Solent Maritime SAC, Solent and Dorset Coast SPA and the Solent and Southampton Water SPA and Ramsar site. Natural England still have a number of concerns around the discharge which we are continuing to work with the applicant on, these include the nature of the chemicals in the waste stream and the effects on achieving EQS levels (Environmental Quality Standards) and the potential changes in salinity and the subsequent impacts this could have on the designated site features. Natural England has flagged the need for in-combination impact modelling of the waste stream with the Sandown water recycling option (non DCO application), the results of which we are expected shortly.

Natural England has also had discussions and further discussions are needed on the emergency drawdown of the reservoir. In relation to potential water quality implications/ changes which could occur to the Hermitage Stream catchment as result of recycled water changing the water chemistry of the reservoir, which would come out of this discharge in an emergency and routinely when the reservoir reaches capacity. Mitigation will likely be needed to ensure environmental impacts do not occur. The potential impacts on the marine environment and species such as fish should also be considered.

Natural England should be kept informed and continue to be engaged in this scheme as is progresses through the examination process and subsequent stages of assessment.

Detailed advice on scoping the Environmental Statement is available in the attached Annex.

For any further advice on this consultation please contact the case officer Rachael Clemson on [redacted]@naturalengland.org.uk and copy to consultations@naturalengland.org.uk.

Yours sincerely

Rachael Clemson
Sustainable Development Lead Adviser
Thames Solent Area Team

Annex A – Natural England Advice on EIA Scoping

1. General Principles

Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Appropriately scaled and referenced plans which clearly show the information and features associated with the development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects and matters requested to be scoped out of further assessment with adequate justification provided[1].
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation, cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- An outline of the structure of the proposed ES
- A non-technical summary of the information
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information

2. Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

Please consider the following and whether we are aware of other projects we think do need to be considered.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have

[1] National Infrastructure Planning (planninginsepctorate.gov.uk) Insert 2 – information to be provided with a scoping request, Advice Note Seven, Environmental Impact Assessment, Process, Preliminary Environmental Information and Environmental Statements

been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

a. existing completed projects
b. approved but uncompleted projects
c. ongoing activities
d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

3. Environmental data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at http://www.naturalengland.org.uk/publications/data/default.aspx.

Detailed information on the natural environment is available at www.magic.gov.uk. This includes Marine Conservation Zone GIS shapefiles.

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.

4. Biodiversity and Geodiversity

The assessment will need to include potential impacts of the proposal upon sites and features of nature conservation interest as well as opportunities for nature recovery through biodiversity net gain (BNG). There might also be strategic approaches to take into account.

Ecological Impact Assessment (EcIA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. Guidelines have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

Many public authorities e.g., National Highways, National Grid have biodiversity duties including taking opportunities for habitat restoration or enhancement. They might have Key Performance Indicators (KPIs) to adhere to via Government policy, or have agreed approaches to BNG. Further information around general duties is available here.

The National Policy Statement for Water Resources Infrastructure provides guidance on biodiversity considerations. In additional applications for development consent should set out how opportunities for on-site delivery of biodiversity net gain have been considered and, where they are proposed, how they have been incorporated into the project design.

5. Designated nature conservation sites

5.1 International and European sites

The development site is within or may impact on the following **European/internationally designated nature conservation site(s):**

- **Solent and Southampton Water Special Protection Area (SPA) and Ramsar**
- **Solent and Dorset Coast SPA**
- **Solent Maritime SAC**
- **Chichester and Langstone Harbours SPA and Ramsar**
- **River Itchen SAC**
- **Solent and Isle of Wight Lagoon SAC**
- **South Wight Maritime SAC**
- **Portsmouth Harbour SPA and Ramsar**

European site conservation objectives are available at http://publications.naturalengland.org.uk/category/6490068894089216

The ES should thoroughly assess the potential for the proposal to affect internationally designated sites of nature conservation importance / European sites, including marine sites where relevant. This includes Special Protection Areas (SPA), Special Areas of Conservation (SAC), listed Ramsar sites, candidate SAC and proposed SPA.

Article 6 (3) of the Habitats Directive requires an appropriate assessment where a plan or project is likely to have a significant effect upon a European Site, either individually or in combination with other plans or projects.

Evidence Plans are a useful mechanism NSIP applicants can use to agree what information should be provided to the Planning Inspectorate and Natural England when undertaking Habitats Regulations Assessment (HRA). Agreeing the evidence-needs of the project early prior to applying for Development Consent will help reduce delays in the process. More information on Evidence Plans is available here.

Natural England's Impact Risk Zones incorporate internationally designated sites and features and can be used to help identify the potential for the development to impact on a European Site. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

5.2 SPA Functional Land

The ES should thoroughly assess the potential for the proposal to affect SPA functionally linked land, which forms part of a network of terrestrial sites located outside of the Solent SPAs boundaries used by SPA species (including qualifying features and assemblage species) as alternative areas for roosting and foraging. These sites support the functionality of the designated sites and are therefore protected in this context. Please see the Solent Wader and Brent Goose Strategy (SWBGS) for more information.

It is advised that impacts are properly assessed, and any identified impacts are addressed in line with the SWBGS Guidance on Mitigation and Offsetting Requirements. Please note, where financial contributions are proposed, for example to mitigate impacts on Low Use sites, it is advised that a sufficient level detail of the measures to which they will be directed is provided to inform the appropriate assessment, in order to provide the necessary confidence and certainty that such mitigation will be effective and deliverable in perpetuity.

5.3 Nationally designated sites

Sites of Special Scientific Interest

The development site is within or may impact on the following **Site(s) of Special Scientific Interest:**

- **Langstone Harbour**
- **Chichester Harbour**
- **Portsmouth Harbour**
- **River Itchen**
- **Portsdown Hill**
- **Waltham Chase Meadows**
- **Botley Wood & Everett & Mushes Copse**
- **Moorgreen Meadows**
- **Hook Heath Meadows**
- **Upper Hamble Estuary and Woods**
- **Lee-on-the-Solent to Itchen Estuary**
- **Sinah Common**
- **Gilkicker Lagoon**
- **Brading Marshes to St Helen Ledges**
- **Whitecliff Bay and Bembridge Ledges**
- **Ryde Sands and Wootton Creek**

Checks should be made to ensure all appropriate SSSI within the vicinity of the scheme have been appropriately screened in and considered.

Sites of Special Scientific Interest are protected under the Wildlife and Countryside Act 1981 (as amended). Further information on the SSSI and its special interest features can be found at www.magic.gov .

Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSI and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.

6. Marine Conservation Zones and the marine environment

The ES should include a full assessment of the direct and indirect effects of the development on the site and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.

Natural England has MCZ designation and habitat data available. These datasets can be accessed from either MAGIC - Datasets (defra.gov.uk) or the Natural England Open Data Geoportal

The following Marine Conservation Zones (MCZs) are in the vicinity of the Eastney LSO, Bembridge, Utopia and Selsey Bill and the Hounds.

These should be considered in the screening, Bembridge is the site within the closest proximity to the scheme, and this could also be impacted in-combination with Sandown water recycling scheme (non DCO). It is acknowledged Bembridge MCZ is listed in the report, as an overlapping site but unclear if specifically included in the screening.

The emergency overflow/reservoir overtopping should also be considered in the marine environment chapter. As this has the potential to change the water chemistry in the Hermitage Stream catchment, which could change the nature of the water reaching the marine environment in Langstone Harbour. This should be considered further, along with impacts on species using this watercourse such as fish, which might be impeded from migrating upstream due to the chemical signals being different at the mouth of the harbour.

The marine section does not appear to have considered the impact on birds from either the construction or the operation stage. It is unclear if this has been considered appropriately for the marine environment in another section. The impacts on birds should be considered, this should include species designated as part of the SPAs and Ramsar sites in the vicinity and priority species. The scoping should also consider disturbance to bird species from construction works within the vicinity of the harbours.

Direct habitat loss in the marine environment has been screened out at the operation phase, there is a potential for the discharge to impact the marine environment due to the change in nature of this discharge. This can therefore not be screened out at this stage. Further survey data is needed to determine the habitat types within the vicinity of the Eastney LSO and further consideration needed to the potential impacts on these. Further discussions with environmental regulators on the potential marine impacts is advised.

The applicant should also scope and consider any change in the discharge to CSOs (Combined Sewage Overflows) within the Langstone Harbour, Natural England has had discussions with the applicant on this in catch up meetings and the pathway for impact does not seem to be present, but this should be scoped to confirm this or at least outlined within the report.

7. Regionally and Locally Important Sites

The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geo-conservation group or other local group. The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. They may also provide opportunities for delivering beneficial environmental outcomes.

Natural England notes Local Nature Reserves (LNRs) have been considered in the screening.

These are contacts for the relevant local body in this area who will be able to provide further information:

- Hampshire Biodiversity Information Centre

8. Protected Species

The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*.

Applicants should check to see if a mitigation licence is required using NE guidance on licencing NE wildlife licences. Applicants can also make use of Natural England's (NE) charged service Pre Submission Screening Service for a review of a draft wildlife licence

application. NE then reviews a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. This is done to give the Planning Inspectorate confidence to make a recommendation to the relevant Secretary of State in granting a DCO. See **Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate | National Infrastructure Planning** For details of the LONI process.

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted standing advice for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

Scoping of protected species

Terrestrial invertebrates have been scoped out for both construction and operation, with the survey data collected to date it is hard to determine if these will be impacted. Whilst the risk may be low, with the data available it is advisable to scope these in at this stage for construction. But subsequent surveys and assessments may then show these are not impacted, but scoping out at this stage will mean these impacts are not considered.

9. District Level Licensing for Great Crested Newts

Natural England are aware that Southern Water is applying to use the District Level Licensing scheme for great crested newts (GCN).

Where strategic approaches such as district level licensing (DLL) for great crested newts (GCN) are used, a letter of no impediment (LONI) will not be required. Instead, the developer will need to provide evidence to the Examining Authority (ExA) on how and where this approach has been used in relation to the proposal, which must include a counter-signed Impact Assessment and Conservation Payment Certificate (IACPC) from Natural England, or a similar approval from an alternative DLL provider.

The DLL approach is underpinned by a strategic area assessment which includes the identification of risk zones, strategic opportunity area maps and a mechanism to ensure adequate compensation is provided regardless of the level of impact. In addition, Natural England (or an alternative DLL provider) will undertake an impact assessment, the outcome of which will be documented in the IACPC (or equivalent).

If no GCN surveys have been undertaken, Natural England's risk zone modelling may be relied upon. During the impact assessment, Natural England will inform the Applicant whether their scheme is within one of the amber risk zones and therefore whether the

Proposed Development is likely to have a significant effect on GCN.
The IACPC will also provide additional detail including information on the Proposed Development's impact on GCN and the appropriate compensation required.

By demonstrating that the DLL scheme for GCN will be used, consideration of GCN in the ES can be restricted to cross-referring to the Natural England (or alternative provider) IACPC as a justification as to why significant effects on GCN populations as a result of the Proposed Development would be avoided.

10. Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found here. Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to download. Further information is also available here.

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. Natural England acknowledges surveys of this nature are underway for this scheme.

The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g., from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g., whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

Any mitigation or compensation works taking place in the vicinity of the project including those as part of the Havant Thicket reservoir project need to be suitably considered in the EIA and subsequent environmental assessments. These should form part of the baseline assessment. Further discussions are needed with Portsmouth Water on works being undertaken in the Riders Lane Stream and Hermitage stream catchments to ensure this is considered and the works not impacted by this scheme. The same applies for the river Meon compensation.

11. Ancient Woodland, ancient and veteran trees

The ES should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 4.3.18 of the National Policy Statement for Water Resources and Paragraph 180 of the NPPF sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists.

Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. The wood pasture and parkland inventory sets out information on wood pasture and parkland.

The ancient tree inventory provides information on the location of ancient and veteran trees.

Natural England and the Forestry Commission have prepared standing advice on ancient woodland, ancient and veteran trees.

Natural England acknowledges these have been assessed in relation to this scheme, further discussions are needed as the scheme progresses to ensure impacts are limited. A substantial package of mitigation has been put forward by Portsmouth Water for Havant Thicket which includes tree relocating and woodland enhancement, this scheme should not impact upon these areas, this should be considered as part of the baseline in any scoping. Opportunities for further enhancement should also be explored within the vicinity of Havant Thicket and elsewhere along the pipeline route.

12. Biodiversity net gain

Paragraph 4.3.20 of the National Policy Statement for Water Resources sets out the requirement for delivery of biodiversity net gain for national infrastructure projects

The ES should use an appropriate biodiversity metric such as Biodiversity Metric 3.0 together with ecological advice to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve a net gain.

The metric should be used to:
• assess or audit the biodiversity unit value of land within the application area
• calculate the losses and gains in biodiversity unit value resulting from proposed development
• demonstrate that the required percentage biodiversity net gain will be achieved

Biodiversity Net Gain outcomes can be achieved on-site, off-site or through a combination of both. On-site provision should be considered first. Delivery should create or enhance habitats of equal or higher value. We encourage Southern Water to seek to maximise and take opportunities for delivering biodiversity net gain and enhancement of ecological networks across the project as a whole both in and around the development area.

When delivering net gain, opportunities should be sought to link delivery to relevant plans or strategies e.g., Green Infrastructure Strategies or Local Nature Recovery Strategies. These are prepared by local planning authorities.

13. Landscape

13.1 Nationally Designated Landscapes

The development site is within or may impact on the South Downs National Park and Chichester Harbour Area of Outstanding Natural Beauty.

13.2 Landscape and visual impacts

General approach to Landscape and visual impact assessments in the ES

The environmental assessment should refer to the relevant National Character Areas. Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in *Guidelines for Landscape and Visual Impact Assessment 2013 (*(3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the National Design Guide and National Model Design Code.

The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

The National Infrastructure Commission has also produced Design Principles Design Principles for National Infrastructure - NIC endorsed by Government in the National Infrastructure Strategy.

South Downs National Park

We advise the EIA should have regard to Strategic Policy SD42 of the South Downs Local Plan which sets out that development proposals for new infrastructure will only be permitted where:
a) It represents the least environmentally harmful option reasonably available, also having regard to the operational requirements and technical limitations of the proposed infrastructure; and

b) The design minimises the impact on the natural beauty, wildlife and cultural heritage of the National Park and the general amenity of local communities.

The South Downs National Park Partnership Management Plan 2020-2025 also encourages infrastructure projects to identify the potential for harm to the National Park through an evidence-based approach and to following the mitigation hierarchy in the development and evolution of their proposals. Also, for the Defra Environmental metrics (such as the Environmental Benefits of Nature Tool) to be used to achieve environmental net gain, where possible, to any proposals for new infrastructure and major development within the setting of and in the National Park.

Discussions are ongoing between Natural England, the applicant and the South Downs National Park on the routing of the pipeline crossing of the River Itchen SAC, as one of the options is within the national park boundary. These discussions are to ensure that the route chosen limits impacts to both the River Itchen SAC and the South Downs National Park.

14. Connecting People with nature

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 100 and there will be reference in the relevant National Policy Statement. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

15. Soils and Agricultural Land Quality

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line paragraphs 5.168, 5.167 and 5.179 of the NPS for National Networks. Further guidance is set out in the Natural England Guide to assessing development proposals on agricultural land.

The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES):

- The degree to which soils would be disturbed or damaged as part of the development

- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted.

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).

- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.

- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

Further information is available in the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites and
The British Society of Soil Science Guidance Note Benefitting from Soil Management in Development and Construction.

16. Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg) [1]. A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NOx and SO_2 against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts of air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air

[1] Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK

Pollution Information System (www.apis.ac.uk).

Natural England has produced guidance for public bodies to help assess the impacts of road traffic emissions to air quality capable of affecting European Sites. Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations - NEA001

17. Water Quality

NSIPs can occur in areas where strategic solutions are being determined for water pollution issues and they may not have been factored into the local planning system as they are delivered through National Policy Statements.

The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. The ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels.

18. Climate Change

Development of water resources infrastructure could give rise to greenhouse gas emissions during the construction and operational development phases. Paragraph 4.4.11 sets out that the applicant should provide evidence of the climate impact of the development and an assessment of emissions associated with construction and operations against the water company's ability to deliver its contribution to the government's emission targets and commitments.

Additionally, paragraph 4.4.12 sets out that EIA development should include in the ES an assessment of any likely significant climate effects on the project itself.

Marie Shoesmith
The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Our Ref: ENQ/23/20186
Your Ref: WA010002-000010-230725

31 July 2023

Dear Ms Shoesmith

Request for pre application advice

Site Address:	**Hampshire Water Transfer & Water Recycling Project**
Proposal:	**Application by Southern Water Services Limited (the Applicant) for an Order granting Development Consent for the Hampshire Water Transfer and Water Recycling Project (the Proposed Development)**
	Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

Thank you for your letter of 25th July 2023, consulting us on the request for a Scoping Opinion in connection with the above project.

On behalf of New Forest District Council, I can confirm that we do not wish to make any comments.

Yours sincerely

Ian Rayner
Development Management Team Leader

Direct Line: [redacted]
General: [redacted] Option 1
Email:planning@nfdc.gov.uk

Feekins-Bate, Laura

From: Before You Dig <BeforeYouDig@northerngas.co.uk>
Sent: 26 July 2023 10:17
To: Hampshire Water Project
Subject: RE: EXT:WA010002 - Hampshire Water Transfer and Water Recycling Project - EIA Scoping Notification and Consultation

HI

Northern Gas Networks do not cover this area.

Please use this online tool to find out which gas distribution network you need to contact:

https://www.energynetworks.org/operating-the-networks/whos-my-network-operator

Donna Casey

Administration Assistant
Before You Dig
Northern Gas Networks
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From: Hampshire Water Project <HampshireWaterProject@planninginspectorate.gov.uk>
Sent: 25 July 2023 11:08
Cc: Hampshire Water Project <HampshireWaterProject@planninginspectorate.gov.uk>

Subject: EXT:WA010002 - Hampshire Water Transfer and Water Recycling Project - EIA Scoping Notification and Consultation

Dear Sir / Madam

Please see attached correspondence on the proposed Hampshire Water Transfer and Water Recycling project.

Please note that the deadline for consultation responses is **22 August 2023**, and is a statutory requirement that cannot be extended.

Kind regards
Laura

The Planning Inspectorate

Laura Feekins-Bate
Senior EIA Advisor
The Planning Inspectorate

@PINSgov The Planning Inspectorate planninginspectorate.gov.uk

Ensuring **fairness**, **openness** and **impartiality** across all our services

DPC:76616c646f72

Feekins-Bate, Laura

From: Clerk Otterbourne [redacted]@parish.hants.gov.uk>
Sent: 21 August 2023 16:27
To: Hampshire Water Project
Subject: Consultation Response to WA010002 - Hampshire Water Transfer and Water Recycling Project - EIA Scoping Notification
Attachments: WA010002 - Statutory consultation letter.pdf

Dear Sir/ Madam

Otterbourne Parish Council has reviewed the documents online. Overall, this report appears to be comprehensive in terms of the scope of environment aspects impacted and the risks that need to be addressed in the final environmental assessment. We therefore submit a 'nil response' at this time.

Mrs Julie Ayre
Clerk
Otterbourne Parish Council
PO Box 663
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Email: [redacted]@parish.hants.gov.uk
Tel: [redacted]

Dear Sir / Madam

Please see attached correspondence on the proposed Hampshire Water Transfer and Water Recycling project.

Please note that the deadline for consultation responses is **22 August 2023**, and is a statutory requirement that cannot be extended.

Kind regards

Laura

The Planning Inspectorate

Laura Feekins-Bate
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Phone: [redacted]

Marie Shoesmith
Senior EIA Advisor
on behalf of the Secretary of State

by email only to:
hampshirewaterproject@planninginspectorate.gov.uk

Our Ref: 23/00919/PAPA06
Your Ref: WA010002-000010-230725

21 August 2023

Dear Ms Shoesmith

Re: Scoping Opinion

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11 Application by Southern Water Services Limited (the Applicant) for an Order granting Development Consent for the Hampshire Water Transfer and Water Recycling Project (the Proposed Development)

Further to your request dated 25 July 2023, please find below the comments from technical consultees within Portsmouth City Council, based on the Chapter headings within Volume 1 Main Report of the EIA Scoping Report

Chapters 1 - 5: No comments at this stage.

Chapter 6 - Air Quality & Odour
Comments on this topic will be submitted separately.

Chapter 7 - Archaeology & Cultural Heritage
Chapter 7 of the main report, that addresses archaeological matters, is endorsed. It is acknowledged within the report that there will be archaeological impacts associated with this project that will need to be reviewed, assessed, accommodated and mitigated and as a consequence archaeological matters have been scoped in.

We are aware that the applicant has already taken steps to secure preliminary archaeological advice for their own archaeological advisors and from the EIA Working Group (Historic Environment and Landscape Working Group) which has already met (para 5.3.4 and 7.3.1 and 2). I can confirm that I have attend these meetings on behalf of Hampshire County Council and their scope, discussion and progress is properly reflected in Chapter 7.

In summary I note that archaeological matters have been scoped in and I welcome this as being appropriate.

Chapter 8 - Terrestrial and freshwater biodiversity
No comments at this time

Chapter 9 - Marine biodiversity

No comments at this time

Chapter 10 - Carbon and Climate Change
No comments at this time

Chapter 11 - Land quality and ground conditions
Contaminated Land
Chapter 11 summarises the context and approach to contaminated land RISK assessment. It also provides signposting to other chapters where land contamination has impacts. The intended risk assessment approach detailed in the report, and distances for consideration of potential sources and sensitive uses in the desk study are acceptable. These tasks are best undertaken within the EIA rather than leave the task to DCO and have a Design and Build contractor having to cost works before knowing the ground conditions. the outcome of the risk assessment may lead to altered route. In section 11.5.1 the report states that a Stantec desk study, and AECOM ground investigation reports were used. If and where these overlap with Portsmouth's LA areas, they should be shared to allow review.

The route as it relates to Portsmouth crosses the LA area, firstly in the northeast and then into Havant, and then secondly crosses Portsmouth Harbour back westward and onto Portsea Island and then runs southward to the outfall, but without any ground works being specified as required:

1. A mid-section of the proposed underground pipeline between Havant Thicket Reservoir and Otterbourne WSW.

The route skirts close to the northern boundary of Portsmouth's LA limits with Winchester eventually crossing into the Portsmouth's LA area just south of Widley. It then largely follows the road eastward towards the treatment works. This section of the route may have already been subject to non-targeted sampling and preliminary risk assessment but this is not reported upon in the EIA scoping document and so must be confirmed as being the same (along with completing the risk assessment), or the actual route intended subject to risk assessment in accordance with BS10175. In either case, further details are requested to be included within the EIA document. Omitting short sections from the EIA to be considered separately risks orphaning this section and it being overlooked.

This route comes into the Portsmouth's area from Winchester, then exits on its journey into Havant. The applicant may confirm if this is the same route previously been considered in the report Atkins HTR-ATK-XX-FN-RP-Z-0001 dated March 2022 and draw on that information although it is not mentioned in the submission.

Ground conditions will require investigation by a mixture of desk study and limited targeted sampling for geoenvironmental (identification of contamination) combined with some untargeted sampling to obtain coverage for geotechnical considerations along the length of the route where changes are being made. It is suggested these risk assessment records are produced to support the EIA rather than delay and essential task and risk amending routes and needing changes to the DCO.

This information and testing should also help inform the potential for material re-use and working practices, but note that the waste desk study, waste testing, and WAC screening tests differ from the MCERTs testing needed for the site itself. The risk assessment should consider risks to the scheme, as well as the risks from the scheme changing the environment and contaminant pathways. The outline approach in the submission do highlight the many interactions and shows that the work is appropriately considered. That work, detailed in various chapters as well as Chapter 11 may not have yet been undertaken as (there are reports mentioned but are not yet available for review) and so we would ask that the route be confirmed and risk assessments shared.

The Contaminated Land Team would not request contaminated land to feature in the EIA if it was

only a short length of pipeline but now that this relates to a larger more complex scheme, its exclusion from the EIA would mean a mid-section could be missed.

The route then passes out of Portsmouth's LA area into Havant LA and onwards to Budds Farm and the proposed tunnel.

2. From Havant the route doglegs back across under agricultural land at Farlington Marshes through existing tunnels (otherwise these grazing NR soils would need assessment and protection) then through tunnels onto Portsea Island. The absence of any ground works being required is requested. It is also highlighted that coastal defences are being improved along this coastline despite it being agricultural.

Connection via existing tunnel from the WTW across two parts of Langstone Harbour under Farlington Marshes, onto Portsea Island and then southward through the existing Eastney Transfer Tunnel, Eastney Pumping Station and out to sea via the Eastney longshore outfall.

The route on Portsea Island itself runs along the eastern edge of the city crossing known landfill, infilled Milton harbour, further areas of industrial made ground, and near if not through MOD landfill. However, the transfer is through established routes not requiring any changes using the Eastney Transfer Tunnel, ending up at the pumping station and hence the outfall.

The applicant should confirm that the pipeline from Farlington Marshes through to discharge at the Eastney longshore outfall is all pre-existing infrastructure and no further ground works are required in Portsmouth LA area. The report does suggest this, but confirmation would be welcome. The submission states that these established routes are not to be changed, and there is no mention of any further changes. As such, the only areas of change within Portsmouth (and this must be confirmed by the applicant) is the length of pipework near Fort Widely heading westwards above the Cosham area of the city (Drayton and Farlington, Paulsgrove being mentioned in the report)

The section of tunnelling in north Portsmouth is not discussed in the scoping report but should be elaborated upon in the EIA along with its risk assessment. Whilst most of the various sections of the second leg of the route in Portsmouth's LA area is stated to not require any ground works, the applicant should confirm there are no areas that my reply has overlooked needing changes, upgrades, or other ground works, such as landing platforms or new tunnelling along the length.

There will be one or several temporary construction hub or compounds in unknown locations that may be outside the DCO. A Method Statement should be in place to protect any areas of temporary usage within the order limits, and requiring agreements if it is outside of the order limits. This is to avoid degradation of the soil quality from compaction and by potentially contaminated arisings being stored on land.

Operational powers will seemingly be being sought through a DCO for the route along Portsea Island to allow for changes but there is no explanation for why any additional powers above the normal powers of the utility undertaker are required - the transfer tunnel, pumping station, and outfall are said to already be suitable.

The EIA should highlight all areas with ground works or changes occurring and also the areas without changes to confirm. A risk assessment as below undertaken for all areas to scope intrusive testing. In order to undertake the risk assessment, each LA should be contacted for their records to check whether potentially contaminated land is already known, or suspected. The awareness of potential impacts already in the submitted report and such matters as mobile contaminants, ground gas being afforded new routes should be included. The risk assessment report in accordance with BS10175:2011 should contain a conceptual model taking the form of diagram, plan, and network diagram for any potentially contaminated ground being crossed. The sampling rationale shall target locations identified as having increased likelihood of contamination that could affect the scheme or as a result of the scheme migrate to new receptors. The depths for sampling should be based on the conceptual model. The report should confirm either that the section of route is currently suitable

or how it will be made so by remediation (Phase 2 report). In addition, on this linear feature, a method statement (detailing the remedial scheme for areas identified as needing further works) and general measures to be undertaken to avoid risk from contaminants when the development is undertaken would be needed.

Chapter 12 - Land use and agriculture
No comments at this stage

Chapter 13 - Landscape and visual impact
We appreciate the approach to the LVIA detailed in the Scoping document and the iterative process carried out so far with the Local Authorities. Although a ZVI and 107 viewpoints have been identified so far, we look forward to this iterative process being continued to further refine the assessment and receptors/views as the design of the Proposed Development progresses. (ref: Item 13.4.5 in the main document).

We note this especially in the case of routes to be confirmed over Portsdown Hill and tunnel shaft locations to be confirmed.

We did ask that a viewpoint be added from Farlington marshes alongside the viewpoint from Eastney road to ensure views from the Solent Way are covered of the WRP and HLPS development and would appreciate this being included as we do not see it in Figure 13.4 Sheet 1 of 9.

Overall, we appreciate the approach planned to firstly avoid where possible landscape and visual impacts and to mitigate where impacts may be unavoidable. (Ref: Item 13.9 in the main document). We look forward to this premise being equally applied to existing soils, trees, hedges and nature rich areas within the proposals as well as to the possible visual impacts.

In addition, we do note that there does appear to be possible events impacts that might occur in the movement of water to Havant Thicket and other reservoirs and in additional outfall at Eastney pumping station that have been scoped out of the proposed EIA. It is suggested that the risks of impacts will be of environmental and water quality only, but I would suggest there will be an experiential and landscape impact in the event of any flooding or overflow increase to users of the woods and sea.

Chapter 14 - Noise and vibration
Having had a look at the Scoping Report and associated volumes in relation noise and vibration, Section 14 of Volume I Main Report details all appropriate legislation, regulations, and guidance to be used to address any significant adverse impact to Noise and Vibration Sensitive Receptors (NVSR's). Given the exact route of the pipeline and contractors have not yet been finalised, when that information is confirmed Portsmouth City Council (PCC) will require the following information:

1) Confirmation of the exact pipeline route
2) Confirmation of the contractor
3) The specific Sections/Phases of the pipeline route that construction may have an adverse impact upon PCC residents.
4) Noise and Vibration Assessments as per BS 5228-1:2009+A1:2014 Parts 1 & 2 including all specified measures to mitigate any identified observed adverse effect levels to PCC NVSR's.
5) Anticipated timescales for start and completion of those phases that may impact upon PCC NVSR's
6) Anticipated operational times of excessively noisy works during those phases.
7) A copy of the finalised CEMP.

N.B. It is recognised that information pertaining to Points 5 & 6 above may not be able to be provided until significantly further into the Project.

Chapter 15 - Resource and waste management

No comments at this stage

Chapter 16 - Socio-economics, tourism, recreation and health
No comments at this stage

Chapter 17 - Traffic and transport
From a highway perspective due to the early engagement with the applicants, comments during the meetings have appear to be taken on board. Please note that PCC highways will have a keen interest on maintenance/compound sites and their servicing arrangements.

Chapter 18 - Water Environment
At such time when the preferred route is fully identified, PCC LLFA requests consultation of the Construction phase plan to include groundwater, overland flow routes, highway and highway drainage considerations as well as mitigation of impacts on properties and other lands.

The route across the top of Portsmouth administrative boundary is not known for flooding, other than isolated incidents relating to minor infrastructure or level issues.
It is unlikely groundwater will be encountered during the construction and operation phase on top of Portsdown Hill, however this should still be considered.

PCC LLFA wishes to understand the full impacts on Budds Farm, Eastney transfer tunnel, Eastney pumping station and the long sea outfall - all of which are assets critical to the drainage and flood risk of Portsmouth.
Fig 11.6 - blocks and labels are missing

A further comment is whether the Figure 18.8 of the EIA Scoping Report Volume 3 figures part 5 of 5 fig is correct as reservoir flooding is only accounted for in Flood and Water Management Act 2010 when above ground storage

Chapters 19 - 24:
No comments at this time.

Conclusion
The topics highlighted in this scoping opinion should be assessed during the EIA process and the outcome of these assessments should be documented in the ES in support of the planning application(s). This statement, however, should not necessarily be seen as a definitive list of all EIA requirements. Given the scale and programme of these planned works other work may prove necessary. The fact that the Local Planning Authority broadly accepts the content of the Scoping Report, this Scoping Opinion does not prevent the Authorities from requesting further information at a later stage. It should also be noted that no indication of the likely success of any planning application is implied in the expression of this Opinion.

Yours sincerely

Edward Chetwynd-Stapylton BSc Hons, DipTP, Dip Surv, MRTPI
Development Management Team Leader (CIL, Enforcement & Trees)
Directorate of Regeneration
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CONSULTATION UNDER THE TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE ENGLAND) ORDER 2010	
Planning Application Reference:	**WA010002**
Proposal:	**Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11 Application by Southern Water Services Limited (the Applicant) for an Order granting Development Consent for the Hampshire Water Transfer and Water Recycling Project (the Proposed Development)**
Date:	**22 August 2023**

Please find below Portsmouth Water's comments on the Hampshire Water Transfer & Water Recycling Project EIA Scoping submission.

Volume I Main report

Sections 1.3.7, 1.5, 3.2, 3.3, 3.3.23 & 3.6.

The Scoping Opinion in Chapters 1 and 3 needs to be clearer that the applicant for the Proposed Development is Southern Water and not Portsmouth Water, parts of the documents are not clear on this. Also, it needs to be clear that HTR is owned and operated by Portsmouth Water.

Section 1.5.5 & 1.5.6, 3.1.8, 3.3.6

These sections state that an underground pipeline between the proposed Water Recycling Plant and Havant Thicket Reservoir will be proposed. As discussed with Southern Water previously, a section of the pipeline will be above ground due to the significant risk underground pipeline will have on water quality and water resources around the Bedhampton water treatment works. Therefore, these sections need to include this proposal as well.

Section 3.5.4 Proposed underground pipelines.

As described above, underground pipelines present a risk to water quality and water resources if they are located in the area of abstractions and springs that supply water for Portsmouth Water's water supply network. We have had meetings and made representations to Southern Water about the risks associated with underground pipelines and we are in discussions about which sections present the most significant risks and requested alternative options and mitigation against water quality and water resources impacts. Significant potential impacts have been identified around the Bedhampton springs where water flows through the fractured chalk geology and is collected via chamber before pumping to Farlington Water Treatment Works. Any activity, including pipeline construction could have an adverse impact on spring flow and water quality.

Another location of the pipeline route is near to Lower Upham where Portsmouth Water has an abstraction. Whist the pipeline corridor is within a Source Protection Zone 1c, it is not known whether it is being constructed through the clay or below this in the chalk. Confirmation of this will be required as the above concerns and significant risks will be similar if in the chalk.

Table 8.6 and Table 8.7

We support the inclusion of the scoped in items included within these tables, particularly with not only construction water quality impacts to habitats but also of future operational impacts, particularly from emergency discharge and washout events that could impact surface water's. The inclusion of INNS is also supported, particularly with introduction of invasive species at Havant Thicket reservoir, the bulk transfer of water and impacts from water discharges (emergency and washouts).

Section 11.5.10

An additional landfilled area needs to be included – Portsmouth Water Inert landfill at Bedhampton WTW's.

Section 11.5.23

Though we support the following statement made in the section and support the production of the HIA (Hydrogeological Impact Assessment), it is limited as it could be used to scope out certain activities in SPZs. We therefore support that any activities in the SPZs should be assessed in the EIA and HIA.
Whether the SPZ is a potential receptor would be dependent on the vertical extent of the SPZ in relation to the stratigraphy underlying the Proposed Development. Determination of whether the SPZ would be considered a receptor, and therefore be impacted by the Proposed Development, would be driven by the outputs of hydrogeological risk assessments for the Proposed Underground Pipeline between the proposed WRP and Havant Thicket Reservoir (see also Chapter 18 Water Environment (including Flood Risk)).

Section 11.6.4 Construction Effects – effects on groundwater

This section is welcome but there are additional risks to water quality that haven't been included. The effect of drilling muds and additives presents a risk but also the tunneling that could mobilise soil and geology through tunnelling that creates sediment turbidity. However, this has been scoped into the ES so further assessment can be evaluated.

Section 18.5.47 onwards

As stated above, the pipeline route is proposed to go through SPZ1c for Lower Upham. This has not been fully addressed in this Scoping Opinion and needs to be considered further in the ES. However, it is noted that the Preliminary hydrogeological impact assessment (HIA Appendix II) has included reference to Lower Upham as an abstraction in the vicinity of the pipeline route.

Section 18.6 Scoping of potential effects.

We have reviewed this section and we are pleased that potential effects to water quality and water resources are scoped in from the proposed development.

Section 18.6.26

Scoped out - changes to groundwater flow.

We disagree that this section is scoped out. If the ES assessment includes pipeline tunnelling through the sensitive geological faulting and spring flow area of Bedhampton, if constructed, the underground infrastructure will have likely a significant effect on groundwater flows. Therefore, it is important to address this, and that the ES needs to consider alternative pipeline routes, including above ground pipeline construction to mitigate against this significant risk.

Section 18.7.39

We welcome the production of the Hydrogeological Impact Assessment. Portsmouth Water wishes to be closely involved and contribute to this assessment going forward.

Additional comment

Solution features are only mentioned once, in section 18 (Water Environment; 18.5.5). We would expect this to be considered further in Chapter 11 (Land Quality and ground conditions) due to the location of the WRP and proposed pipeline routes. It is noted though that Karst has been included within Appendix II Preliminary Hydrogeological Impact Assessment (HIA) section 2.1.45 – 2.1.49.

Catchment Management Team
Portsmouth Water

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Rowlands Castle Parish Council

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The Planning Inspectorate
Environmental Services
Operations Group 3
By Email: hampshirewaterproject@planninginspectorate.gov.uk
Your Ref: WA010002-000010-230725 dated 25 July 2023

17 August 2023

Dear Sir/Madam

Application by Southern Water Services Ltd for an Order granting Development Consent for the Hampshire Water Transfer and Water Recycling Project - Scoping Opinion requested for the information to be provided in an Environmental Statement relating to the proposed development

Rowlands Castle Parish Council (RCPC) has been identified as a statutory consultee by the Planning Inspectorate and therefore is providing a response to the EIA Scoping Report.

The bulk of our comments (developed by our consultant, a former Environment & Biodiversity Specialist & Former Local Authority Contaminated Land Specialist & Drinking Water Inspector) are laid out in Annex A (pages 6 to 31) to this letter and from that document we highlight a number of principal concerns in the paragraphs below. Please note that some comments in the Annex are repeated for different Sections of the Main Report where it is necessary to do so.

We also attach a letter in Annex B (pages 32 to 35) sent by Havant Borough Residents Alliance and other signatories (of which RCPC is one) to the CEO of Southern Water (SW) as that makes some important points in a bit more detail, particularly the failure to follow the statutory consultation process

Our overall and overriding concern is that this whole Water Transfer and Water Recycling Project (WT&WRP) is flawed in its concept and how it is to be delivered. SW has decided that this scheme as proposed is the only answer to the potential shortfall in water supply in its area instead of looking carefully and thoroughly across all the possible options that cumulatively could deliver what is required at far less cost to the environment and to customers. In addition, the goalposts keep being moved as the project was originally supposed to be supplying 15Ml/d when required during drought with just a sweetening flow through the plant and pipeline of 5Ml/d and now the EIA Scoping paper indicates 20Ml/d to be pumped continuously, even when there is no need for this additional water to top up normal supplies. SW should be delivering solutions that represent best value for customers and enable it to be net zero by 2030. The proposed scheme is not best value and certainly won't contribute to carbon reduction. Costs will rise considerably for consumers at a time when so many are being squeezed financially already and the environmental costs of increased energy and materials consumption plus the adverse impact on many locations on land and at sea will be unacceptable.

Work will need to take place in many areas to deliver this scheme and all these work areas need to be included in the Environmental Statement (ES) following production of the EIA. The ES must include a description of reasonable alternatives in terms of design, technology, location, size, and scale studied by the Applicant, together with their assessed cost and construction/delivery timescale**.** Other more sustainable alternatives that could be developed at less cost and more quickly have not been identified in the EIA scoping, instead they have been 'parked' by SW. The

EIA must consider and assess all of the alternatives that could reasonably be developed to meet some of the demand deficit in the short to medium term, as other alternatives are likely to have less significant effects. Alternative selection should not work solely on the basis that the entire longer term potential water demand deficit needs to be met by just one scheme. This prevents more sustainable options being selected such as:- moving the Otterbourne abstraction to just above the tidal limit of the River Itchen; use of multiple aquifer storage schemes (including Test MARS that SW's own Habitats Regulation Assessment (HRA) suggests could provide up to 15Ml/d); new winter storage reservoir options (including options similar to those considered by the Water Boards in 1960 to 1980); re-using the Farlington Springs source abandoned in 1905 and effluent recycling from Peel Common WWTW to a local river or bespoke environmental buffer lake (EBL), which SW's own report has confirmed has more environmental benefits to the coast than any Budds Farm option.

Information in the previous SW Strategic Environmental Assessment (SEA) cannot be relied on for use in the full EIA. The significant flaws in the SEA process need to be highlighted and addressed as part of the new EIA. Not all potential impacts were considered, eg impacts on the coast were dismissed without even understanding what the pathways and impacts were. There was also a concern that benefits provided by the original PW HTR scheme were being double-counted, which was not appropriate. How does a scheme that scored highest in the SEA for adverse impacts get selected?

Section 5.3.1 confirmed that the DCO process requires consultation and stakeholder engagement as part of the progression of the Proposed Development. We draw your attention to the fact that appropriate consultation has not taken place through the options appraisal process, nor since the current proposal was selected and there is significant concern amongst the local community that SW have not followed the statutory consultation process. When both their preferred WRMP19 desalination scheme and alternative water recycling scheme failed this resulted in a 'material change' to the plan, with new options having to be considered. However, not all of the alternative options were considered, nor was there any further consultation initiated, depriving the local communities and stakeholders of the opportunity to highlight concerns.

There is also great concern that the SW consultation did not make it clear that Portsmouth Water (PW) customers would receive the recycled water via the Farlington WTW whenever PW use the Havant Thicket Reservoir (HTR).

Section 5.3.2 refers to a collaborative approach by the applicant, yet their approach has been anything but collaborative. Despite repeated requests over the period of a year SW & PW have failed to form a stakeholder group to discuss effluent recycling via HTR, even though multiple other stakeholder sub-groups have been formed by PW to provide a liaison forum in association with the development of the spring-fed reservoir. The main reservoir stakeholder group and sub-group members have repeatedly asked for an effluent recycling group to be formed so that concerns about the environmental impacts can be discussed. In the past 2 weeks PW has confirmed a sub-group will be established, but there is no information on when it will first meet.

Section 5.3.4 refers to; Five EIA Working Groups have been set up by the Applicant to facilitate engagement with statutory consultees through the progression of the EIA for the DCO application. As local stakeholders we have no knowledge of this.

A more robust 'alternatives assessment' needs to be completed for the selection of the Water Recycling Plant (WRP) location as the process described on page 34/35 was not robust. The WRP is to be constructed on an uncontained 'dilute and disperse' landfill so release of leachate & landfill gas is inevitable and the risks to the internationally important harbour and local residents must be fully considered for both its construction and operation.

The water quality, hydrological and geochemical impacts, including salinity and temperature in the HTR, need to be considered under all operating scenarios. There does not seem to be any

reference to consideration of impacts on the reservoir and associated habitats. What will be considered is also not explicitly set out in other chapters of this scoping document.

It is unclear what operating scenarios for the effluent recycling plant and reservoir drawdown will be assessed. The full range of operating scenarios need to be modelled and assessed in the EIA as it cannot be assumed that the highest and lowest inputs would create the reasonable worst-case scenario, it could be a different combination of inputs and outputs.

The EIA needs to consider any potential impacts that may occur associated with a pollution event, including that associated with a short or longer-term discharge of out-of-specification recycled water entering the reservoir, which is to be used as an environmental buffer lake. Any negative impacts the effluent recycling scheme will have on the original spring fed reservoir proposal also need to be considered. This includes any potential loss in benefits, including any potential changes to seasonally fluctuating water levels, water temperature, salinity, risks of eutrophication and algal blooms as well as the loss of the very unique biodiversity opportunity to create a chalk-spring-fed reservoir.

While the use of the HTR for storage of recycled effluent is scoped into the assessment for marine impacts it is not clear whether all activities that give a connection to the marine environment are to be considered. Note that the significant benefit to the coastal SPA/SAC of spring water being pumped up to the HTR, reducing nitrate discharges into Langstone Harbour, will be reduced by the effluent recycling proposal and this is significant, as the benefit the reservoir provides in reducing nitrates to Langstone Harbour (helping to reducing eutrophication/ algal blooms) was a key benefit identified in the HRA for the spring fed reservoir. The modelling undertaken for the EIA must clearly demonstrate without doubt that the benefit is not diminished by the proposed scheme, or clarify the extent to which the benefit is lost.

Section 10.5.8 – Emissions net zero target - states that: 'A Strategic Objective for the Proposed Development is to support and contribute to Water UK's net zero target and the PIC'. However, this is a high energy and high carbon option that will make the carbon emissions of the company worse as the effluent recycling plant and 40km+ pipeline are required to pump 20Ml/d (8 Olympic size swimming pools) every day of the year, even when the water is not needed because the additional water is only actually needed as a drought resource. How will this be taken into account in the EIA when there are other more sustainable lower carbon solutions available?

The project makes no contribution towards achieving a science-based 1.5°C aligned transition towards net zero. The proposed scheme is infrastructure heavy and it is far from clear how the huge energy and carbon footprint generated over the 100-year operational life of the scheme will be assessed in relation to all of the potential operating scenarios, in order to give a meaningful analysis. Page 211 - In-combination and cumulative impacts with other projects are scoped out, even though most of the options selected by SW are high energy and carbon solutions involving desalination and effluent recycling. How will SW ever be made to take energy and carbon into account in their decision making if cumulative effects of their WRMP options are scoped out?

Noise and vibration at the reservoir site during construction and operation should not be scoped out of the assessment (Section 14.4.29 & 14.5.16 refer**),** neither should noise or vibration associated with operation of the pipelines (Section 14.5.13)

Section 15.6.6 states that there are no operational effects that are deemed likely to be significant and therefore operational effects are scoped out of the assessment. The resources needed to run the effluent recycling plant 24 hours a day including energy and chemicals are very significant, especially when the plant must run even when the water is not needed. If you add to that the energy needed to pump 20Ml/d of recycled water more than 40km to Otterbourne, also even when the water is not needed, this represents an enormous waste of resources. Additional energy resources will also be needed to mix the water 365 days a year. The use of this extra energy required for the proposed effluent recycling scheme will put unnecessary pressure on the local energy infrastructure at peak demand driving the National Grid to use less sustainable

energy production measures with a higher carbon footprint. Surely the excessive use and waste of energy must be taken into consideration as part of the EIA otherwise this undermines the whole purpose of doing an EIA, especially when there are other lower energy, more sustainable alternatives available.

The SW 2022 survey confirmed that 48% of people who responded to the survey did not support effluent recycling. Many people have said that they do not trust SW with this complex treatment process which is new to the UK. Significant numbers of people have indicated they will no longer drink tap water if the proposal to recycle effluent goes ahead. How will the EIA take into consideration the direct and indirect impacts associated with the rejection of tap water if this scheme goes ahead. These include;

- Manufacture and transport of many thousands of plastic bottles to meet increased demand.
- Waste disposal costs and environmental impacts of disposing of many thousands more plastic bottles. Likely increase in littering.

It is necessary to ensure that benefits are not double counted. The original spring-fed reservoir will provide many benefits to the local community in terms of recreational opportunities, health benefits (physical & mental), educational opportunities and tourism. The proposal for effluent recycling provides no added benefits to the local community in any of these respects, in fact as described above it could actually reduce the value of the reservoir benefits to the local communities and individuals. It is important that the EIA for the effluent recycling scheme does not claim benefits for the project that already being provided by the original reservoir scheme. There is a concern that such benefits have been inappropriately claimed in other SW reports to help justify the selection of the scheme.

Increased health & safety risks associated with new infrastructure. Section 16.6.11 confirms that the potential for the risk of interaction with operational/maintenance vehicles and plant during the operation stage will be considered. However, what will be considered is not clear. This should include;

- The new inlet/outlet offshore tower at the reservoir site – risks associated with youths trying to access the bridge, or jumping/ diving off it, risk of youths and others trying to swim out to the offshore tower, with additional risk associated with the recycled effluent inlet pipe and outlet pipe to Otterbourne operating 356 days a year.
- Infrastructure associated with the pipelines/ tunnels – shaft access points, air valves, washouts and manholes in areas of public open space and residential areas.

Apart from the risks associated with development and the new infrastructure there is no attempt to consider the longer-term health of people over many years from drinking treated effluent water. Often, potential harmful effects are not realised until many years after materials or substances are used by humans eg lead piping to deliver water and asbestos for fire retardation. Any health assessments should include a long-term consideration of peoples' health as well as the short-term consideration during development/construction. It is not known whether any studies have been made in the past on the long-term impact of drinking recycled water that may still contain all sorts of trace substances but they should be done.

Page 481/482 does not provide any information on the baseline condition of the reservoir as a surface water body filled with water from the Havant & Bedhampton Springs. It is important to identify the baseline as it has planning permission, is under construction and will be impacted by the effluent recycling proposal. Additionally, HTR was to have been filled with naturally filtered chalk spring water that would have created a unique biodiversity opportunity. How will this lost unique biodiversity opportunity be assessed in the EIA?

While the HTR wetland is held back behind a retaining structure during drawdown events, the reality is that for most of the time the water level in the reservoir will mean that there is hydraulic

continuity between the reservoir and the wetland. Recycled effluent will mix with spring water and flow into the wetland. How will any potential impact on the wetland be assessed?

There is a lack of public trust in SW to complete the necessary modelling with respect to water quality impacts for the reservoir and long sea outfall. This is fundamental as the modelling outputs will be used in the EIA. How will the modelling methodology, parameters, scenarios and outputs be independently peer reviewed to give confidence that the EIA will be based on meaningful data?

The above concerns are just some of what is laid out in the attached Annex. There are many omissions from the EIA that need to be addressed so that the full adverse environmental impact of this proposed project is assessed and laid out to inform the possible granting of Development Consent.

Yours faithfully

Lisa Walker – Clerk
For and on behalf of Rowlands Castle Parish Council

Annex A

Hampshire Water Transfer & Recycling Project – EIA Scoping Report – In-depth Comments and Proposed Inclusions for Assessment

General Comments
Very concerned that the goal posts keep moving on this project. Initially the project was to supply up to 15Ml/d with a daily sweetening flow through the plant and 40km+ pipeline to Otterbourne of 5Ml/d. Now the EIA Scoping indicated at 1.3.8 it will be 20Ml/d, a massive increase in daily chemical, energy and carbon impacts, making an already unsustainable scheme even more unsustainable.

- This is a concern for the EIA as work completed quickly becomes out of date as the parameters change. It is important that the final EIA uses modelling and assessment based on the final design parameters.

Section 1.4.3 indicates that Southern Waters (SW) Strategic Objective is to deliver solutions which are 'best value' for customers and continue to allow the company to make progress towards meeting its commitment to be net zero carbon by 2030. We are very concerned that the **proposed scheme is <u>not</u> best value and does <u>not</u> contribute to carbon reduction** when it requires 20Ml/d of recycled water to be treated and pumped every day of the year, even when the water is not needed as it is supposed to be just a drought resource. As a new technology to the UK costs will continue to balloon, not just to bills, but to the environment and the climate as well.

A. <u>Description of the development</u> - Specific feedback on Section 3, but it also has implications for other chapters.
3.3.13 – Any works needed to upgrade the Otterbourne Water Supply Works (WSW) as a result of receiving water from this scheme should be considered as part of this EIA.
In addition, any works needed to upgrade the Farlington WSW should also be considered as part of the EIA. The Dissolved Air Flotation plant sized and designed for treating spring water stored in the reservoir may need to be upgraded or modified in some way as a result of the effluent recycling scheme. For example, changes to the treatment process may be needed to address taste issues. If so, these changes must be considered in the EIA.
3.3.17/ 3.3.20 – Indicated that it is not clear how many pumping stations or break pressure tanks will be required along the route. Provisional locations were shown on the 2022 consultation maps. Likely locations should be identified and assessed as part of the EIA, as they have the potential to cause adverse impacts to people and ecology. For example, as a result of noise pollution as pumps are likely to run at night.
3.5.10 – For pipeline construction using tunnelling the text indicated; The exact locations of launch, reception and any intermediate shafts would be subject to further site selection and public consultation. However, it is already clear that some of the shafts would be needed in very sensitive areas, such as the conservation area at Old Bedhampton. Where shafts and other infrastructure are to be located in residential areas, or locations with historic or ecological significance the proposed location for that infrastructure/ shaft must be included in the EIA so that the impacts can be properly assessed. This applies to tunnelling, micro-tunnelling and directional drilling.

B. <u>Consideration of Alternatives</u>
Section 4.1.2 confirmed that the Planning Inspectorate recommends that the EIA Scoping Report should include an outline of the **reasonable alternatives considered** and the reasons for selecting the preferred option. Section 4.1.3 confirms the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (hereafter referred to as the EIA Regulations) set out that an ES should include a description of **reasonable alternatives in terms of design, technology, location, size, and scale studied by the Applicant.** Unfortunately, the alternatives assessment process described in the scoping since 2019 (Table 4.1) has focused completely on desalination and water recycling options. Other more sustainable alternatives that could be developed more

sustainably at less cost and more quickly have not been identified in the EIA scoping, instead they have been 'parked' by Southern Water.

It is worth noting that 48% of the people that responded to the Southern Water summer 2022 consultation on this scheme did not support water recycling via the Havant Thicket Reservoir and 46% did not support the options appraisal process. Nor is water recycling favoured in the company's own customer research, customers favour more natural solutions such as aquifer recharge and reservoirs.

The EIA must consider and assess all of the alternatives that could reasonably be developed to meet some of the demand deficit in the short to medium term, as other alternatives are likely to have less significant environmental effects. Alternative selection should not work solely on the basis that all of the longer-term potential water demand deficit needs to be met by just one scheme. This prevents more sustainable options being selected. Section 4.2.3 confirms that the Wessex/Bristol Water regional transfer was rejected because it could not deliver water supplies to address the forecast deficit by 2027, but nor could the selected scheme, as the Havant Thicket Reservoir would not be available until 2029. This shows that the options appraisal process has been flawed. Alternative options that should be considered include the following.

- Moving the Otterbourne abstraction to just above the tidal limit of the River Itchen, immediately protecting 9km of internationally important chalk river (SAC). Requiring minimal infrastructure with the option to transfer water to Otterbourne WSW or Testwood WSW both less than 10km away.
- Multiple aquifer storage schemes, including Test MARS which SW's own HRA suggests could provide up to 15ML/d.
- New winter storage reservoir options (including options similar to those considered by the Water Boards in 1960 to 1980)
- Re-using the Farlington Springs source abandoned in 1905 and optimising water production from the chalk/ clay interface between Farlington and Bedhampton, which otherwise flows out to sea and would require minimum treatment and can be directed to the existing Farlington WSW.
- Other effluent recycling schemes closer to where the water is needed in the Southampton area.
- Effluent recycling from Peel Common WWTW to a local river or bespoke environmental buffer lake (EBL), which SW's own report (Gate 2, Annex 5, page 140) confirmed has more environmental benefits to the coast than any Budds Farm option. The EBL would not need to be at Otterbourne. Noting that Option B5 could readily be adapted, there is no need to pump effluent east from Peel Common to a Water Recycling Plant at Budds Farm (Broadmarsh) when the supply deficit is actually in the west of Hampshire. Pumping it 17km east is a waste of money for the extra pipeline, as well as the wasted energy and carbon to operate. The best value assessment and option selection is flawed and more cost-effective options involving Peel Common, which is closer to where the water is needed, should be explored as part of the EIA alternatives assessment.

Note: Section 4.3.14 stated; Option B.5 was ranked second on account of its higher cost relative to Option B.4, its lower flexibility in scalability terms and its lesser ability to act as a regional asset that benefits both Southern Water and Portsmouth Water. This argument is flawed, Budds Farm effluent could be piped to a WRP near Peel Common if extra capacity were needed in the longer term. If SW developed a Peel Common water recycling scheme without the reservoir, then Portsmouth Water would not need to rely on effluent recycling as a regional asset, as they would have the reservoir to meet their long-term needs.

Information in the previous SW Strategic Environmental Assessment (SEA) cannot be relied on for use in the full EIA. The significant flaws in the SEA process need to be highlighted and addressed as part of the new EIA. Not all potential impacts were considered. For example, impacts on the coast were dismissed without even understanding what the pathways and impacts were. There was also a concern that benefits provided by the original reservoir scheme

were being double counted which was not appropriate. How does a scheme that scored highest in the SEA for adverse impacts get selected?

The assessment of the full range of alternatives is important not only to the assessment in the EIA but also to Stage 3 of the Habitats Regulation Assessment which is required.

C. Consultation

Section 5.3.1 confirmed that the DCO process requires consultation and stakeholder engagement as part of the progression of the Proposed Development. It is prudent at this time to draw to your attention to the fact that **appropriate consultation has not taken place** through the options appraisal process, nor since the current proposal was selected.

There is significant concern amongst the local community that **SW did not follow the statutory consultation process,** when both their preferred WRMP19 desalination scheme and alternative water recycling scheme failed. This resulted in a 'material change' to the plan, with new options having to be considered. However, not all of the alternative options were considered, nor was there any further consultation initiated, depriving the local communities and stakeholders of the opportunity to highlight concerns and alternative options.

There is also a significant concern that the SW consultation documents did **not make it clear that Portsmouth Water (PW) customers would receive the recycled water** via the Farlington WTW whenever PW use the reservoir.

There is a real concern that Southern Water have **not been open and transparent with the information needed to be able to understand what is proposed**. When reports have been published relating to the effluent recycling scheme. The Gate 2 documents were very heavily redacted, including the figures showing the scheme, making it virtually impossible for a member of the public to understand what was proposed. Abbreviations used in the reports were set out in a separate 17-page annex. Information was spread over a number of technical documents making them impenetrable to a member of the public. The options appraisal report, SEA and HRA which were supposed to support the draft WRMP24 were made restricted documents and Southern Water refused to provide access to them in Hampshire.

Section 5.3.2 refers to a collaborative approach by the applicant, yet **their approach has been anything but collaborative**. Despite repeated requests over the period of a year SW & PW have failed to form a stakeholder group to discuss effluent recycling via Havant Thicket Reservoir, even though multiple other stakeholder sub-groups have been formed by PW to provide a liaison forum in association with the development of the spring fed reservoir. The main reservoir stakeholder group and sub-group members have repeatedly asked for an effluent recycling group to be formed so that concerns about the environmental impacts can be discussed. In late July Portsmouth Water confirmed a sub-group will be established, but there is no information on when it will first meet.

Section 5.3.4 refers to; Five EIA Working Groups have been set up by the Applicant to facilitate engagement with statutory consultees through the progression of the EIA for the DCO application. As local stakeholders we have no knowledge of this.

D. Water Recycling Plant at Broadmarsh

A more robust alternatives assessment needs to be completed for the selection of the Water Recycling Plant (WRP) location. The process described on page 34/35 was not robust. For example, sites were excluded if they were more than a short distance away from Budds Farm. However, that would not be a limiting factor. It is not credible that constructing the WRP on an uncontained dilute and disperse landfill site adjacent to an SPA, SCA, SSSI and Ramsar is the best solution, when the development clearly presents a number of risks to the adjacent internationally important site and should fail a Habitats Regulation Assessment.
If the mitigation hierarchy is applied a different site should have been selected that did not have the significant risks development of the Broadmarsh landfill site has. As is indicated in 11.9.2 of

the scoping report Primary Mitigation should be achieved by avoiding known sources of contamination risk. Given that the dilute and disperse landfill is a known and significant contamination source how/ why has that site been selected?

It is worth noting that 41% of the people who responded to the Southern Water summer 2022 public consultation did not support the selection of the Broadmarsh landfill (site 72) for the location of the Water Recycling Plant.

The WRP is to be constructed on an uncontained dilute and disperse landfill so release of leachate & landfill gas is inevitable and the risks to the internationally important harbour and local residents must be fully considered. Section 3.5.2 acknowledges that construction techniques can try to reduce the impacts, but the reality is that given the lack of an engineered containment to the landfill they cannot stop it. Section 5.2.37 confirms that the assessment is based on a realistic worst-case approach therefore the release of leachate and landfill gas to sensitive receptors does need to be robustly considered. Following application of the mitigation hierarchy (5.2.39) the landfill site should <u>not</u> have been selected to avoid the impact.

The Conceptual Model for the proposed Water Recycling Plant, tunnels and shafts associated with the three pipelines proposed at the Broadmarsh landfill is set out in the Preliminary Hydrological Impact Assessment (Appendix 18.1, Table 3.1, 3.2 & 3.3). The Conceptual Model is missing important information and should include the following:

- The presence of the buried former Hermitage Stream channel and creeks below the landfill which create the risk of preferential pathways from the landfill to the harbour. As the route of the stream was diverted prior to the commencement of tipping.
- Groundwater flow in the chalk is confirmed to be to the south, carrying the water towards the harbour but the potential presence of springs emerging in the harbour is not identified.

Appendix 18.1, Section 4.4.3 (Construction Impact) and 6 (Conclusions) should specifically recognise the significant risk of piling and excavating shafts through the uncontained landfill and variable (depth & permeability) alluvium layer into the chalk aquifer, creating new preferential pathways to the aquifer and making existing pathways worse.

Risk from construction, maintenance and burst of pipes carrying effluent from Budds Farm to WRP and waste/ reject liquids from WRP to Budds Farm WWTW and Eastney PS must be considered in the EIA.

Visual/ landscape impact over a wide area will be necessary given the need for several large holding tanks and chemical storage units to be constructed above ground in addition to the main WRP buildings and plant (3.5.3 refers). Noting that 3.6.4 confirms that the buildings are likely to be 13m high and they are already on an unnaturally high mound (c.14m OD) in the local landscape. As a result, the WRP will be visible from vantage points around the harbour and likely from Old Bedhampton (Conservation Area).

E. <u>Pipelines/ tunnels</u>

Not clear how maintenance events are being considered for pipelines/ tunnels at different depths. What would be involved and how often? Is this being taken into account in the EIA?

Refers to washouts at 750m to 1km (3.6.13) and the fact they could release source water into local water courses during commissioning, repair and maintenance (3.6.11), but not clear how often they are assuming that will happen for the different pipelines. Use of washouts from the different types of pipeline should be considered in the EIA.

Not clear if there would be any noise or smell from the normal functioning of air valves within the pipelines carrying water of different qualities (final effluent, recycled water, reject water), or whether this has been taken into consideration. This should be considered as part of the EIA.

F. Air quality – Odour

Construction impacts for WRP at Broadmarsh – it is suggested on page 69 (pdf 80) that impacts on human and ecological receptors as a result of odour emissions is scoped out. This is not appropriate. The argument is made that because this was not raised as an issue for a previous planning application the same would apply for the proposed development. The proposed development is of a completely different scale, magnitude, and duration, with the requirement for large scale excavation of the historic landfill to provide a more even development surface, to excavate pipelines, services, as well as to construct shafts through the landfill for tunnel construction, with tunnels exiting the site in 3 different directions. The landfill was deposited between 1960 and 1990 and has been slowly rotting in the ground for decades. Opening up the landfill for the necessary construction operations will let in oxygen and the wind potentially resulting in the generation of significant odours and air quality issues for local residents and users of the adjacent country park and coastal path. It would be very difficult to stop odours being generated, solutions such as adding water as a mist could actually make the situation worse.

- **The impacts during construction of the WRP (associated buildings, tanks, pipelines, services, pumping stations etc.) on human & ecological receptors (adjacent SPA, SSSI) should be scoped in for assessment, including odour impacts.**

Reject water; Provided the reject wastewater stream for the effluent recycling plant is fully enclosed within sealed pipes and tanks then the operational phase could be scoped out for odour, but this needs to be checked.

If the water quality assessment results in an increased risk of algal blooms at the reservoir under any of the broad range of operating regimes that need to be assessed, then there is an increased risk of odour during operation of the reservoir. When algae in a reservoir die films, scums and algal matts can be generated which in warm weather can degrade to produce significant odour problems.

- **Given the proximity of the reservoir to residential properties at Rowlands Castle, Warren Park and Leigh Park, as well as the recreational use of the site the risk of odour issues during operation at the reservoir site should be scoped in and assessed.**

G. Archaeology & Cultural Heritage

Section 7.6.18 states that; No physical works or visible change are proposed at the Eastney TT or Eastney LSO or Havant Thicket Reservoir during operation, and it is therefore proposed to scope out any effects, whether arising from physical change or change to setting of designated and non-designated heritage assets during operation. However, changes are occurring to the original reservoir design since the proposal for the effluent recycling has come forward which mean that **the impacts on heritage and cultural aspects at the reservoir site should be assessed both during construction and operation.**

For example, changes include the following.

- There is a proposal for a shared pipeline route, which will make the working area and the excavation for construction of the pipelines larger, including where the pipes pass through the Grade II listed Historic Park and Gardens. This construction impact through Staunton Country Park should be considered as part of the assessment.
- To help the reservoir blend into the natural landscape and minimise any visual impact on the Grade II listed Historic Park and Gardens the original reservoir inlet/outlet shaft was to be contained within the embankment adjacent to a semi buried control house. This was particularly important as this part of the reservoir is in, or immediately adjacent to the designated Conservation Area shown on Figure 7.1 (sheet 1). Portsmouth Water have recently confirmed a design change with the inlet/ outlet shaft moved and located offshore from the control house, where it will be visible from every vantage point around the reservoir site including from;
    - The terrace view point within the Grade II listed park, and
    - The important view point to be constructed at the end of The Avenue, where visitors will exit from the historic Staunton Country Park onto the reservoir site

It is highly likely that this design change has been triggered by the addition of extra inlet and outlet pipes required for the effluent recycling scheme, as well as to enhance the opportunities to mix the recycled water with the spring water. The proposed new inlet/outlet tower will be present throughout the operation of the site impacting the historic landscape / views and should be considered in the assessment.
These impacts also need to be considered in-combination and cumulatively with the adverse impact of the original reservoir proposal.

Old Bedhampton Conservation Area; The construction of tunnel shafts in and around the Conservation Area and potentially within Bidbury Park will have very significant impacts on this historic area for a long period. The construction impacts on archaeology and cultural heritage in this area need to be very carefully assessed.

H. <u>Terrestrial & Freshwater Biodiversity</u>
Pg124 – A general reference is made to hydrology and water quality impacts. When considering water quality changes to stream environments it is important to consider all of the potential geochemical impacts, including changes in salinity and temperature to the downstream watercourse/ habitats.

The water quality, hydrological, geochemical impacts, including salinity and temperature on the Havant Thicket Reservoir also need to be considered under <u>all</u> operating scenarios. There did not seem to be any reference to consideration of impacts on the reservoir and associated habitats in this section. What will be considered is also not explicitly set out in other chapters of this scoping document.

Pg 125 – Indicates that noise is only a problem to biodiversity during construction of the WRP. This is not the case, it will also be an issue that needs to be considered when constructing the pumping stations, break pressure tanks, pipelines, tunnel shafts etc. This is not currently recognised.

Page 128 – Indicated that Terrestrial invertebrates are scoped out. **Aquatic invertebrates** in the reservoir and downstream watercourses need to remain scoped in. River habitat and corridor surveys mentioned on page 130 should include kick sampling, as this revealed unusual invertebrates in the ephemeral streams at the reservoir site, so these may also be found downstream of the reservoir.

Page 134 – **Assessment Scenarios**; It is unclear what operating scenarios for the effluent recycling plant and reservoir drawdown will be assessed. The full range of operating scenarios need to be modelled and assessed in the EIA as it cannot be assumed that the highest and lowest inputs would create the reasonable worst-case scenario, it could be a different combination of inputs and outputs.

- From no recycled effluent input, to the base flow in operation (currently stated to be 20 Ml/d, but previously stated to be 5, 7.5 or 15Ml/d), through a range of flows in to the reservoir up to 60Ml/d.
- From the baseline transfer to Otterbourne currently stated to be 20 Ml/d (but previously stated to be 5, 7.5 or 15Ml/d), through a range of flows out of the reservoir up to 90Ml/d.
- The period of operation of the scenario will also be relevant to the impact on habitats and biodiversity. Including consecutive year droughts. This will also have impacts on the reservoir retained wetland, especially in multiple year drought scenarios.

Changes to ecology / biodiversity net gain as a result impacts on seasonally fluctuating water levels; Southern Water have indicated in published reports that they will keep the reservoir topped up. This would result in a loss of biodiversity net gain at the reservoir. As the operating regime for the spring fed reservoir would have resulted in seasonally fluctuating water levels, with water levels dropping through the summer due to the compensation discharge to the Riders Land Stream and evaporation. This would have exposed islands in the wetland for nesting birds, provided muddy edges for chicks and returning migrant birds to feed. If these benefits are

to be lost then this must be included in the EIA and assessed as a cumulative negative impact upon the original reserve scheme.

Impacts on the retained wetland; The EIA should specifically include a review on the impacts of the effluent recycling scheme on the retained wetland at the reservoir in terms of potential changes in water quality and changes in water levels as a result of the different operating regimes, including drought use with more drawdown events and potentially more rapid, and/or longer drawdown events when larger volumes are supplied to Otterbourne via the new transfer pipeline. These changes could affect the biodiversity present in the wetland, the habitat quality and distribution across the wetland.

Water quality impacts on ecology; The EIA needs to consider any potential impacts on ecology that may occur associated with;

- A **pollution event(s)**, including that associated with short or longer-term discharge of out of specification recycled water entering the reservoir, as it is to be used as an environmental buffer lake by Southern Water.
- **Bioaccumulation of elements or compounds** in the reservoir water or sediment, plus the risk of their remobilisation in storm or other events.

More detail is provided in the Water Environment section Q response below.

This chapter needs to include **impacts on Brent geese and wading birds** that use terrestrial habitats which are supporting habitats to the SPA, including the WRP site. Noting that construction of the WRP and three pipeline tunnel shafts at Broadmarsh and further shafts at Budds Farm WWTW will take place over a period of several years. Normal mitigation would be to avoid construction at sensitive times of year for the species using the SPA but that will not be practical given the scale of works involved.

Habitats Regulation Assessment (HRA); The scoping report confirms that an HRA will be completed. It is worth noting that the previous Southern Water HRA screening for this scheme was very disappointing and did not consider all of the potential effects on internationally important sites. For example, it did not consider the changes to the compensation discharge from the reservoir via the streams to Langstone Harbour (SPA, SAC, Ramsar), nor emergency drawdown testing or emergency events. Impacts at the coast were also not appropriately considered in terms of the reject water discharge to the Solent (noting the volumes have now changed again), leachate and other risks associated with the construction of the WRP at Broadmarsh on the coast, or the loss of nitrate benefits to Langstone Harbour. The original reservoir scheme was also to provide a benefit in drawing recreational visitors away from the coast (especially dog walkers), who may return to the coast at times when the reservoir is drawn down, which is expected to be more frequent once the transfer to Otterbourne is in place.

- **It is essential that the HRA is robust and considers all of the potential impact pathways.**
- **Given that a significant impact is expected to be identified from a more robust assessment it is essential a comprehensive assessment of the alternatives is undertaken at Stage 3, taking into account the comments made in Section B above. A number of smaller schemes are likely to have less impact on the international important sites.**

Pg 135 In-combination & cumulative effects – Any negative impacts the effluent recycling scheme will have on the original spring fed reservoir proposal also need to be considered. This **includes any potential loss in benefits**, including any potential changes to seasonally fluctuating water levels, water temperature, salinity, risks of eutrophication and algal blooms. As well as the loss of the very unique biodiversity opportunity to create a chalk spring fed reservoir.

Cumulative effect(s) on Protected Species, This infrastructure heavy solution requires three pipelines (including a 40km+ pipeline) many pumping stations and a number of break pressure tanks. Some will be located along woodland edges, or below woodlands or other bat habitats.

The impact of the scheme on bats was not properly considered during the previous Habitats Regulation Screening.

- **The impact on bats needs to be considered at each site, cumulatively for all sites involved in the scheme, along with the in-combination impacts with other schemes and projects, including the impacts of the original spring fed reservoir scheme.**
- Particular attention is needed to the rarer bats which have been shown to be using the habitats in the vicinity of the Havant Reservoir Site which are already having to adapt to significant loss and changes in the habitats at the reservoir site.

Invasive species transfer risk; If one of the pipeline experiences a burst, or maintenance and flushing is required, there is the potential risk of non-native and invasive species transfer to other catchments. For example, the River Itchen SAC, River Meon Compensatory SAC, River Hamble etc.

- The risk of the spread of non-native and invasive species does need to be considered in the EIA.

Delivering 10% Biodiversity net gain; It is important that the net gain being delivered for the original spring fed reservoir project (including on and off-site mitigation and compensation) is not counted as biodiversity net gain for the effluent recycling scheme.

- **Separate mitigation and compensation measures must be proposed to deliver an additional 10% biodiversity net gain.**

Action to top up the wetland if more frequent drawdown proposed; The transfer of larger volumes of water to Otterbourne is likely to result in more frequent and potentially prolonged drawdown events. The EIA should consider if the scheme needs to include a mechanism for topping up the wetland in a drought from water abstracted from the main reservoir bowl, below the drawdown level. This would be to protect the wetland habitats from drying out and dying. Any solution would need to be sustainable and avoid the need for regular man entry into the wetland for maintenance or refuelling. For example, by installing a wind or solar pumps to add water to the retained wetland during drawdown.

I. <u>Marine Biodiversity</u>

9.4.7 While the use of Havant Thicket Reservoir for storage of recycled effluent is scoped into the assessment for marine impacts it is <u>not</u> clear whether all activities which give a connection to the marine environment are to be considered. For the avoidance of any doubt the following activities which can result in an impact on the marine environment need to be considered in the assessment.

- **Daily compensation discharge/ spillway discharge** from the reservoir via the Riders Lane and Hermitage Streams to Langstone Harbour. This will transfer a mix of recycled effluent and spring water daily to the coast. The ratio of the mixed water will be variable dependent on the operating scenario of the effluent recycling plant.
- **Emergency drawdown annual testing, as well as operation in an emergency.** The discharge would be via the Riders Lane and Hermitage Streams to Langstone Harbour. Once the channels in the Hermitage Stream are naturalised in accordance with the S106 agreement there will be an increased risk of sediment scouring and discharge to the coast, as well as the carriage of a large volume of recycled effluent mixed with spring water to the harbour.
- **Reduced pumping of spring water up to the reservoir** each autumn/ winter if the reservoir has been kept topped up with recycled effluent through the summer, or if the reservoir has been drawn down but already partially or completely topped up with recycled effluent. These scenarios result in a reduced benefit to the coastal SPA/ SAC as spring water elevated in nitrates that should have been used to top up the reservoir is instead discharged to Langstone Harbour.
- **A pollution event,** including that associated with short or longer-term discharge of out of specification recycled water entering the reservoir, as the reservoir is to be used by Southern Water as an environmental buffer lake.

Note: The significant benefit to the coastal SPA/SAC of spring water being pumped up to the reservoir, reducing nitrate discharges into Langstone Harbour will be reduced by the effluent recycling proposal and this is a significant in combination/ cumulative impact with the originally approved spring fed reservoir. This in-combination/ cumulative effect needs to be assessed, as the benefit the reservoir provides in reducing nitrates to Langstone Harbour (helping to reduce eutrophication/ algal blooms) was a key benefit identified in the HRA for the spring fed reservoir. The modelling undertaken for the EIA must clearly demonstrate without doubt that the benefit is not diminished by the proposed scheme, or clarify the extent to which the benefit is lost.
All of these **impacts must be modelled and assessed under a full range or normal and more extreme operating scenarios** as it cannot be assumed that the highest and lowest inputs would create the reasonable worst-case scenario, it could be a different combination of inputs and outputs.

- From no recycled effluent input to the base flow in operation (currently stated to be 20 Ml/d (but previously stated to be 5, 7.5 or 15Ml/d), through a range of flows in to the reservoir up to 60Ml/d.
- From the baseline transfer to Otterbourne currently stated to be 20 Ml/d (but previously stated to be 5, 7.5 or 15Ml/d), through a range of flows out of the reservoir up to 90Ml/d.
- The period of operation of the scenario will also be relevant to the impact on habitats and biodiversity. Including consecutive year droughts.

Section 9.5.10 – **fish passage/ spawning**; refers to the shallow depths of water and obstructions that would deem the Hermitage Stream unsuitable for use by migratory species. There is no mention of the fact that before the effluent recycling scheme is complete Portsmouth Water are required to carry out works to make the streams south of the reservoir more suitable for fish migration. Given that these works are required through a planning condition and Section 106 agreement, surely the EIA should consider the potential for fish and eel migration in the context of the improved habitat.

Page 135 - Potential effects from visual disturbance (human presence, vehicle movement and light pollution) on the coast are screened out for construction. It is not clear if this includes the impact of above ground construction noise and vibration on the marine environment.
Construction noise and vibration should <u>not</u> be screened out for the marine environment. There is certainly a potential impact on birds which are supporting features to the SPA, but also potentially to other marine ecology. For example; piling, noise, vibration etc from construction of the WRP and tunnel shafts close to the harbour must be considered in the assessment.

In combination and cumulative effects of this scheme on the marine environment need to be assessed against; the original spring fed reservoir scheme (including the coastal benefits it provided in reducing nitrates), coastal flood defence projects, any alterations going on at Budds Farm WWTW (for example to address the problem with too many storm discharges), and other coastal effluent recycling schemes including on the Isle of Wight and at Littlehampton.

Page 192 - Pollution events (from use of plant and machinery) are scoped out for the operational phase. However, the operational phase will include maintenance of buildings, plant and pipelines etc. Therefore such risks cannot be scoped out. There is also the risk of emergency drawdown events and routine annual testing of the emergency drawdown systems during the operational phase.

- **The risk of pollution events and impacts to the marine environment should be scoped in during the operational phase.**

Introduction of Invasive Non-Native Species;
Page 192 - Scoped out for the marine environment during construction and operation. Is there a potential for non-native species to transfer to and via the marine environment from the reservoir, if the seed stock is tolerant of marine emersion for short periods?

Please also refer to feedback on WRP at D above which is relevant to the marine environment.

J. <u>Climate Change and Carbon</u>

Section 10.5.8 – **Net zero target** - States that; A Strategic Objective for the Proposed Development is to support and contribute to Water UK's net zero target and the PIC. However, this is a high energy and high carbon option that will make the carbon emissions of the company worse as the effluent recycling plant and 40km+ pipeline is required to pump 20Ml/d (8 Olympic size swimming pools) of water every day of the year, even when the water is not needed because the additional water is only actually needed as a drought resource.

- How will this be taken into account in the EIA when there are other more sustainable lower carbon solutions available?

Section 10.6.2 – Decommissioning impacts; It does not seem reasonable to assume that the decommissioning impacts will be negligible.

Page 207 – Greenhouse gas emissions; There is no recognition that greenhouse gases will be emitted when the landfill site at Broadmarsh is opened up during construction of the WRP and shafts are excavated for the tunnels, or during movement and temporary stockpiling of excavated waste.

- **The risk of greenhouse gas emissions from opening the landfill to expose the waste should be included in the assessment.**

Page 207/208 indicated scoped out extreme weather events which are becoming more common, plus in-combination climate change impacts. This seems to be a strange decision without adequate justification. If an extreme weather event hits during construction it could lead to significant effects.

Energy & carbon use during operation; The project makes no contribution towards achieving a science-based 1.5°C aligned transition towards net zero. The proposed scheme is infrastructure heavy and it is far from clear how the huge energy and carbon footprint generated over the 100 year operational life of the scheme will be assessed in relation to all of the potential operating scenarios, in order to give a meaningful analysis of carbon use. For example, during operation SW now propose to treat and pump 20 Ml/d (8 Olympic size swimming pools) of recycled water over 40km every day, even though the water is only needed in a drought scenario. That makes absolutely no sense from a sustainability perspective.

- How will this be assessed when there are lower energy and carbon solutions available? (for other alternatives see feedback on alternatives) If the mitigation hierarchy is applied a scheme with a much lower energy and carbon footprint should have been selected that did not require operation 365 days a year when the scheme has been selected for development as a drought resource.
- If a bigger volume effluent recycling scheme is developed in the future the emissions and carbon impacts will only increase. How will that be taken into account?

Page 211 - In-combination and cumulative impacts with other projects are scoped out, even though most of the options selected by SW are high energy and carbon solutions involving desalination and effluent recycling. How will SW ever be made to take energy and carbon into account in their decision making if cumulative effects of their WRMP options are scoped out?

K. <u>Land Quality and Ground Conditions</u>

See feedback at D above for the WRP at Broadmarsh landfill re risks associated with constructing the WRP on the dilute and disperse landfill, highlighting the risks to the harbour from the historic stream channel and creeks present below the uncontained dilute and disperse landfill.

Page 239 - Table 11-13; The magnitude of the impacts does not seem to make any provision for impacts on the marine environment or biodiversity. This is a significant risk given the proximity of the WRP site to the harbour SPA, SAC, Ramsay and SSSI.

Both leachate and landfill gas migration along preferential pathways from the WRP created by tunnel/ pipelines (including bedding materials) needs to be considered during construction & operation in relation to risks to buildings and residential properties. Given the new pathways to be created by the scheme an arbitrary distance should not be used to assess this risk. A more robust assessment of the risk is needed.

Section 11.7.17 states; Assessment of potential effects will consider the construction and operational phases of the Proposed Development. It is important that the operational impacts associated with any future maintenance of infrastructure at the WRP is considered in the assessment, as every time any excavation is needed workers will be put as risk, by exposure to contaminated ground. Opening up the landfill for maintenance activities, new services etc. also opens up other pathways for impacts such as odour and risks to the marine environment.

Section 11.7.21 refers to in-combination effects, but does not appear to consider the marine environment. If other projects are taking place on the coast the in-combination effects should be considered. For example, any coastal defence works (including those to protect landfill areas), any works at Budds Farm WWTW and the Aquind Interconnector project.

Page 242, Table 11-15; does not seem to make any provision for scoping in the impacts on the marine environment or biodiversity from construction (or maintenance during operation) of the WRP on the dilute & disperse landfill at Broadmarsh. There is a significant risk from developing in the landfill given the proximity of the WRP site to the harbour SPA, SAC, Ramsar and SSSI. These can be;

- Direct discharge of mobilised contaminants from the landfill to the harbour via current surface water ditches and pipes.
- Re-mobilisation of contaminants and gas via preferential paths of weakness. For example, buried historic harbour channels and historic surface water drainage points.
- Indirect discharge of leachate / remobilised contaminants to the harbour via the underlying chalk aquifer into which piles will be driven and tunnel shafts/ pipelines constructed. Groundwater flow is to the south below the landfill and in places may emerge through the harbour mud or in offshore springs.

Page 234, Table 11-15 scopes out maintenance during operation which is a mistake, see 11.7.17 explanation above.

L. <u>Landscape and Visual Impact</u>

Section 13.3.2 states; Stakeholders were informed that no nighttime photography is planned as part of the EIA, and no concerns were raised on this point. As the WRP will operate 24 hours a day with staff present at night, presumably lighting will be required at night. Given the estimated height of structures at the site is 13m and the buildings will be located on a hill, it will be very difficult to screen these structures as planting will not provide an effective screen. Lighting could have a visual impact from some distance away. Including potential impacts on Langstone Harbour SPA & SAC.

- An assessment of the visual impacts of the WRP at night should be considered as part of the EIA.
- The potential impacts on biodiversity of lighting should also be considered.

Page 325 indicates that lighting is scoped in for construction and operation. How will the impacts be assessed if there is no nighttime photography?

Page 284 confirmed that feedback from HCC stated that the proposed AGP and the proposed WRP should be included in the LVIA with consideration of impacts to open coastal land from the sizing and scale of the proposed WRP. This should include night time impacts.

Zone of visibility from around Langstone Harbour; Figure 13.4 (sheet 1 & 8) seems to have an artificial boundary to the zone of visibility as an arc across just a small part of the harbour. The zone should be extended to properly illustrate where the WRP will be visible from across

Langstone Harbour, including at Hayling Island. The visual impact from around Langstone Harbour must be fully considered and not screened out by an arbitrary distance parameter.

Visibility of the WRP from Old Bedhampton needs to be considered; The zone of visibility is not shown extending to Old Bedhampton on Figure 13.4 (sheet 2). Given that the WRP is located on a raised mound (c. 14mOD), the buildings and plant are anticipated to be 13m high, and the residential area to the north is much lower this needs to be checked. If the WRP buildings or plant may be visible from residential properties in Old Bedhampton, or from the historic Conservation area, the study area should be extended to include these areas.

Need for additional representative viewpoints; Figure 13.4 the representative viewpoints shown on the map are not adequate to assess the visual impact of the scheme on the surrounding area. Additional representative viewpoints need to be added to the map.

- At key vantage points from the Hayling Billy coastal path and from the sea wall at Farlington Marshes, as these are important leisure viewpoints. This should include a viewpoint in the vicinity of the disused old Oyster beds area on Hayling Island. This should include daytime and night time views, as the 13m high WRP structures are likely to be lit at night as the plant will run 24 hours a day and be manned. Section 13.5.20 confirmed that the WRP will be visible from the Hayling Billy Trail. The northern section of which is also designated as the West Hayling and Hayling Billy Local Nature Reserves.
- From Old Bedhampton to assess the impact of views across to the WRP. Taking into consideration visibility from residential properties and the historic Conservation Area.
- From the cycleway/ road bridge over the Hermitage Stream at Harts Farm Way.
- Around the Havant Thicket Reservoir, including from the embankment circular route, adjacent to Rowlands Castle (East), Havant Thicket woodland edge viewpoints(North), the Leigh Park viewpoint (SW), proposed visitor centre (NW), from the Staunton Way, as well as at the key Avenue viewpoint (South) where the historic ride/ path from Staunton Country Park (SCP) rises to the top of the reservoir embankment.
- Additional key viewpoints from within SCP including the important and valued historic view from the top of the terrace & Look Out feature from which the reservoir will be visible. Plus, from the HCC boundary alongside the Riders Lane Stream looking north and from the Historic Conservation Area which crosses into the reservoir site.
- All of the viewpoints from which the reservoir is visible, including the new viewpoints around the embankment, plus those in Staunton Country Park (including The Terrace viewpoint) should show the view during normal conditions when the reservoir is full, plus during mid and maximum drawdown events, with supporting information provided on the likely frequency of different severity of drawdown events, so the visual impact under different operating scenarios can be fully considered in the EIA and by stakeholders.

The additional viewpoints around the reservoir are important as the design of the reservoir has been modified to include an inlet/outlet tower, offshore from the control house structure in the SW. This new proposed structure will accommodate the inlet and outlet pipes from the proposed Southern Water effluent recycling scheme and the tower will be visible from all of these viewpoints. The tower/ adjacent area may also accommodate infrastructure needed to mix the recycled effluent with the spring water in the reservoir.

- **Consideration needs to be given to whether this will be visible when the reservoir is drawn down?**
- **If the offshore tower or any of the reservoir infrastructure is to be lit at night both daytime and nighttime views should be provided and considered in the assessment**. Page 325 confirmed that nighttime lighting is scoped in for construction and operation, but it is not clear which elements of the design this relates to.

Visibility of inlet/outlet tower and bridge at the reservoir; There is no recognition in the EIA Scoping text (13.6.6 & 13.6.7) that the proposed effluent recycling scheme will include a tower within the reservoir that the new inlet and outlet pipes will start and end there. This tower did not form part of the original spring fed reservoir design, as the need for a tower was deliberately designed out. The visibility and impact on the landscape of the inlet/ outlet tower and bridge,

including on the historic Grade II listed Park & Garden landscape must be assessed as part of the EIA.

- **The construction and operation impacts at the reservoir site cannot be scoped out as there will be visible infrastructure associated with the proposed effluent recycling project.**

Change to use of reservoir/ drawdown events; Section 13.6.7 states that the existence and operation of the Proposed Underground Pipelines and proposed changes at Havant Thicket Reservoir are not likely to change the landscape and visual baseline and are therefore scoped out of further assessment. This is not correct. The change in the operating regime of the reservoir as a result of the effluent recycling scheme will be significant. More water will be supplied to Southern Water utilising the proposed new pipeline to Otterbourne. The frequency, extent and duration of drawdown events will change as a result of implementation of this scheme. The full range of operational scenarios including the worst case need to be considered at the reservoir site & beyond from where it is visible.

- **Operational impacts at the reservoir site cannot be scoped out as there will be a significant change in the operating regime at the site, the changes in drawdown frequency, extent and duration need to be fully considered.**
- **What infrastructure / apparatus will be visible during drawdown?** For example, more of the new offshore inlet/out tower & pipes will be visible and potentially water mixing apparatus.

Consideration also needs to be given to any landscape impacts of algal events causing the creation of mats if these could be more frequent as a result of the effluent recycling proposals. This will be determined by the water quality assessment.

Old Bedhampton Conservation Area; The construction of tunnel shafts in and around the Conservation Area and potentially within Bidbury Park will have very significant impacts on this tranquil, highly valued historic area for a long period. The construction and operational impacts need to be very carefully assessed as part of the EIA.

Assessment scenarios; The scenarios outlined in Section 13.7.63 are not adequate to assess the visibility and landscape impacts. The scenarios need to include a range of drawdown scenarios at the reservoir, as the operation of the reservoir will change as a result of the proposed effluent recycling scheme and the construction/ operation of the pipeline to transfer water to Otterbourne. The scenarios should also consider the impact that an algal bloom at the reservoir would have on the visual amenity from key viewpoints around the reservoir and at SCP, including the Terrace. This includes the additional viewpoints proposed above.

The in-combination/ cumulative visual impact with the original reservoir proposal must be assessed as it is likely that there will be a negative impact from more frequent and extreme drawdown events, as the scheme allows larger volumes of water to be taken from the reservoir, which will not always be offset by the input of recycled water.

Mitigation of visual impacts; Section 13.9.2 states that the most effective mitigation for adverse landscape and visual effects is to avoid impacts at source as part of the design process, for example through the siting of infrastructure. However, Southern Water are making no effort at all to minimise the visual impacts.

- The WRP does not need to be located on a hill on the edge of Langstone Harbour, it could be sited elsewhere on flat ground away from the coast where it would not have such a significant visual impact. Alternative sites have not been adequately considered.
- The need for an inlet / outlet tower offshore from the control house was designed out of the original reservoir layout which received planning permission from HBC & EHDC. This was to reduce the visual impact on the historic landscape and sensitive ancient woodland landscape. It was also to reduce the health & safety risks associated with the

need for a bridge from the embankment to the tower. The introduction of a tower to accommodate the effluent recycling inlet and outlet pipes is a retrograde step.

Recreational visual receptors - Page 328 summary should confirm the assessment will include;

- Walkers / cyclists on the Hayling Billy Trail
- Visitors to Farlington Marshes Nature Reserve
- Walkers, cyclists and other recreational users at Havant Thicket Reservoir

Figure 17.2 of the EIA Scoping does not show all of the key paths, nor cycle & bridleway routes. The map should be updated to ensure all routes are considered as a part of the assessment.

Figure 16.3 does not show all of the recreation and tourism receptors. Further comments are made in Section O below.

Above ground pipeline construction; Appendix 18.1, Section 2.2.56, states that the feasibility of having part of the pipeline from the WRP to Havant Thicket Reservoir above ground is being assessed. However, this is not mentioned in the Landscape & Visual Impact section of the EIA Scoping. Any areas where an above ground pipeline is being considered should be identified and the visual impact and other risks of that variation in design considered. For example, this could also change the pollution risks.

M. Noise & Vibration;

Noise & vibration at the reservoir scoped out; Section 14.4.29 states that the proposed usage of Havant Thicket Reservoir for the storage of recycled water will not require any construction activities outside the scope of the Proposed Underground Pipeline and its connection with the reservoir, as described above, and will not require any operational plant. Hence, this is not anticipated to result in noise-related effects, and therefore, as discussed in section 14.5 of this chapter, is scoped out of the assessment. This is not correct. An offshore tower has been added to the reservoir design which was not in the original reservoir design which received outline planning consent from HBC & EHDC. The EIA should consider the following.

- The construction of the offshore tower which will incorporate the inlet pipe from the WRP and the outlet pipe to transfer the water to Otterbourne.
- There will also be a need for plant/ infrastructure to ensure that the recycled water is fully mixed with the spring water in the reservoir. The plan for the original reservoir was to build in an aeration system to the reservoir bottom which would only be operated when necessary. The new proposal is that 20ML/d (8 Olympic size swimming pools) of recycled effluent would be pumped to the reservoir 365 days a year, this water will require a mixing system to operate 365 days a year. Any potential impact from the construction and daily operation of the mixing system must be considered as a part of the EIA.
- **Noise and vibration at the reservoir site during operation and construction should not be scoped out of the assessment** (Section 14.4.29 & 14.5.16 refer**)**

Noise or vibration associated with operation of the pipelines; Section 14.5.13 states that operational effects due to noise from the Proposed Underground Pipeline have been scoped out of the assessment. The text makes no reference to the use of air valves or wash outs along the pipeline route, or whether operations associated with these structures could generate noise or vibration. There is also no reference to maintenance activities over the 100-year assessment period, such as washing out the pipeline, or carrying out repairs, or whether future works may be needed at the access shaft locations. Further consideration of these aspects should be undertaken before operational impacts are scoped out.

Noise & vibration impacts on ecology; It is not clear if any potential impacts on ecological receptors are being considered in the assessment? Impacts on sensitive ecological receptors during construction and operation should be considered. Including noise and vibration associated with construction (eg piling) of the WRP at Broadmarsh alongside the Langstone Harbour SPA, SAC, Ramsar & SSSI.

Study area for noise from construction should be extended to include all of Old Bedhampton; This is necessary because the area is likely to be significantly impacted by the following.

- Percussive/ impact noise from piling and shaft construction associated with the WRP and three pipeline shafts at the elevated Broadmarsh site over what will be a very prolonged period (years).
- Significant traffic/ lorry movement down very narrow lanes as the pipeline from the WRP to Havant Thicket Reservoir will require the construction of two large shafts in the vicinity of this very quiet residential area, where there is currently very little traffic, and the only viable access will be through the village.

N. <u>Resource & Waste Management</u>

Study area should include the reservoir site; In Section 15.4.3 the reservoir site is not listed as a part of the study area. As construction and operational activities will take place at the site it should be included in the study area. Activities include construction of the offshore tower and inlet/ outlet connections, a bridge, plus construction and operation of a robust water mixing system which will need to operate daily.

Resources to be used at the reservoir site during construction & operation of the additional or altered infrastructure or apparatus need to be included in the assessment.

Resources that would be required during operation; are set out in Section 15.5.11, this includes
maintenance and plant replacement items. The text states that; These materials would be sourced from a national or international supply chain and the quantities that would be required are considered to be negligible in relation to the supply chain capacity. Given that the technology to treat the recycled effluent is new to the UK, the membranes to be used are expensive, and failure to be able to replace a damaged membrane would be critical to the control of the process to ensure water in the reservoir is within specification, this element of the assessment needs to be given greater consideration as part of the EIA. For example, what happens if a membrane is damaged and there is a delay in sourcing new membranes? Given the cost of the membranes it seems unlikely that Southern Water would keep spares in stock.

Operational resources & wasting resources (including energy); Section 15.6.6 states that there are no operational effects that are deemed likely to be significant. Therefore, operational effects are scoped out of the assessment. The resources needed to run the effluent recycling plant 24 hours a day including energy and chemicals will be very significant, especially when you consider that the plant must run every day even when the water is not needed. If you add to that the energy needed to pump 20Ml/d (8 Olympic swimming pools) of recycled water every day from the reservoir more than 40km to Otterbourne, even when the water is not needed, this represents an enormous waste of resources with a huge carbon impact. Additional energy resources will also be needed to mix the water in the reservoir 365 days a year.
The use of the large extra amount of energy required to operate the proposed effluent recycling scheme 365 days a year is likely to put unnecessary pressure on the local energy infrastructure at peak demand. This in turn will drive the National Grid to use less sustainable energy production measures more often with a higher carbon footprint at times of peak demand.

- **Surely the excessive use and waste of energy & chemicals must be taken into consideration as part of the EIA.** Otherwise, this undermines the whole purpose of doing an EIA, especially when there are other lower energy, more sustainable alternatives available.
- **Operational effects should <u>not</u> be scoped out for resource & waste management.**

Waste from tunnelling and laying pipelines; Whether construction is by open cut or tunnelling for the various pipelines the activity will result in the generation of large volumes of spoil for disposal. In the case of tunnelling the material excavated would likely be removed in a liquid form to the surface, then site cyclones would be used to dry the material, creating large volumes of a soil type material (with no structure) to be removed from site and disposed of. With suitable

testing it may be possible to find someone prepared to take the material and recycle it. This will be a very significant part of the resource & waste management process for the project, but does not seem to be mentioned in the scoping?

This soil processing activity is also very relevant to other chapters of the EIA as the pumps and cyclones that this process will require will be one of the key sources of noise and potentially vibration at shaft locations (many of which will be in residential areas). It will be one the biggest drivers for lorry movements, and the process also gives rise to the risk of potential unauthorised discharges to water courses that all need to be considered in the EIA.

Impacts associated with the increased use of plastic bottles; The Southern Water 2022 survey confirmed that 48% of people who responded to the survey did not support effluent recycling. Many people have said that they do not trust Southern Water with this complex treatment process which is new to the UK. Significant numbers of people have indicated they will no longer drink tap water if the proposal to recycle effluent goes ahead. How will the EIA take into consideration the direct and indirect impacts associated with the rejection of tap water if this scheme goes ahead. These include;

- Manufacture and transport of many thousands of plastic bottles to meet increased demand.
- Waste disposal costs and environmental impacts of disposing of many thousands more plastic bottles.
- The likely increase in litter from inappropriate disposal of plastic drinking water bottles.

O. <u>Socio-Economic & Tourism Recreation & Health</u>

Health impacts associated with people choosing not to drink recycled water –Section 16.6.13 indicated that diet and other lifestyle choices will be scoped out for construction because the Proposed Development has no scope for influencing diet and other lifestyle choices of the local population. There is no comment on this in Section 16.6.16 relating to operation. **It is important that this issue is scoped in for the assessment of operational effects.** However, this is not currently the case. If a significant number of people do decide to reject tap water for drinking this could have a local and regional impact. As the Portsmouth Water & Southern Water supply area covers the whole of south Hampshire and into Sussex, with customers from across both company's supply area having indicated they will stop drinking tap water if the effluent recycling scheme goes ahead.

How will this likely rejection of tap water by some people be assessed in the EIA?

- **There will be economic impacts on the most vulnerable in our society if they reject tap water and have to buy bottled water, including the elderly, disabled and families.**
- **There will be health impacts if people reject tap water and turn to less healthy choices for hydration.**

Note that Southern Water has confirmed that the recycled water mixed in the reservoir may taste different to the water customers are used to receiving at their tap. The risk of customer acceptance associated with the change in taste, or more generally, has not been determined. It is likely that some customers will taste the difference, think about where the water has come from, whether they trust Southern Water and reject tap water for drinking. There has been no proactive customer engagement to assess customer acceptability. In fact, the Southern Water consultation documents (including the summer 2022 consultation specifically on the effluent recycling scheme) failed to make it clear that Portsmouth Water customers would also receive the recycled water via the Farlington WTW.

Recreational & health impacts during operation – Reservoir drawdown will be more frequent if the effluent recycling project goes ahead creating a muddy bowl. A drawn down reservoir and wetland with mud (potentially with smelly mud and algae or algal mats) exposed will be a less attractive place to walk & cycle around, as a result visitor numbers may decrease at times of reservoir drawdown. This may have a direct effect on the community benefit of the reservoir including; the number of recreational visits, how long people stay at the site, how far they walk/ cycle and how much money is spent in the visitor centre. This in turn may have indirect effects on

the health benefits compared to the original spring fed reservoir proposal. Section 16.6.14 & 16.6.16 & Table 16-18 suggests such impacts will be scoped out for recreation and health during operation.

- **These adverse recreational & health effects should be considered as part of the EIA, along with the in-combination/ cumulative effect on the original reservoir proposal.**

Information missing on recreation and tourism receptors; Figure 16.3 (sheet 1) does not appear to show all of the relevant recreational routes. The Staunton Way and Shipwrights Way on the east boundary of the reservoir site at Rowlands Castle are not shown, nor are other bridleway and cycle routes. Figure 17.2 (sheet 1) does show more routes, but still not all public access routes. The bridleway diversion at the Havant Thicket Reservoir site which will happen in August 2023 is not shown.

Ensuring benefits are <u>not</u> double counted; The original spring fed reservoir provides many benefits to the local community in terms of recreational opportunities, health benefits (physical & mental), educational opportunities and tourism benefits. **The proposal for effluent recycling provides <u>no</u> added benefits to the local community in any of these respects, in fact as described above it could actually reduce the value of the benefits to the local communities and individuals**. It is important that the EIA for the effluent recycling scheme does <u>not</u> claim benefits for the project that are already being provided by the original reservoir scheme. There is a concern that such benefits have been inappropriately claimed and double counted in other Southern Water reports to help justify the selection of the scheme.

Adverse impact of the delay to the reservoir as a direct result of the effluent recycling proposal; In July 2023 Portsmouth Water announced that there will be a delay to the completion date for the reservoir which it confirmed was as a direct effect of programming changes to incorporate elements of the effluent recycling proposal into the design. For example, a delay while the effluent recycling pipeline is incorporated into the design of the tunnel and planning application for the route from Bedhampton to the reservoir. Plus, the need to make a planning application for the design change to incorporate an offshore inlet/ outlet tower in the design. This delay to the original reservoir project programme will also result in a delay to the delivery of recreational, health, tourism benefits, along with employment opportunities (visitor centre) associated with the reservoir site.

- **How will this disadvantage/ time delay to benefits be taken into consideration in the EIA?**

The proposal to pursue the effluent recycling scheme could also have a significant adverse impact the public and stakeholder reaction to reserved matters applications for the original reservoir scheme, with a subsequent knock-on effect to the delivery programme and delay to benefits being delivered. This potential risk was flagged by Southern Water (Gate 2, Annex 3, pages 258 & 260) and needs to be considered.

Impacts on future water-based recreation/ education; The original spring fed reservoir proposal was to be future proofed to allow the opportunity for water-based recreation and education to be developed at a later date if required, so that the opportunity the reservoir could provide was not wasted.

- **The EIA needs to consider if the proposal for effluent recycling could in anyway diminish the future potential for the reservoir to be used for water-based recreation and education.**

This could be as a result of water quality issues, the need for daily input and output of water 365 days a year, increased drawdown activity, more rapid drawdown, or the presence of additional infrastructure (offshore tower) or apparatus (water mixing equipment).

Employment opportunities: It is important that the EIA presents a genuine assessment of the employment opportunities available for the operational phase of the project.

- Section 3.6.4 indicated that the WRP will operate 24 hours a day and that it is assumed that approximately 5 operatives would be employed during the day and three during the

night. This seems unlikely and overly optimistic given that on a 2022 tour of the trial recycling plant at Budds Farm WWTW Southern Water indicated that the effluent recycling process was largely automated, and that staff from the nearby Budds Farm WWTW site would be likely to be responsible for looking after the WRP.
- The employment opportunities created at the reservoir should not be included in the assessment as they are created by the original spring fed reservoir proposal with associated staffing of the visitor centre and habitat management requirements. **No** additional opportunities are created at the reservoir site as a result of operation of the effluent recycling scheme.
- Impacts on the loss of employment opportunities from the development already approved at the WRP site should be scoped in during operation (16.6.15 & Table 16-18 suggests it be scoped out).

Increased health & safety risks associated with new infrastructure; Section 16.6.11 confirms that the potential for the risk of interaction with operational/maintenance vehicles and plant during the operation stage will be considered. However, what will be considered is not clear. The EIA should include consideration of risks associated with the following.
- The new inlet/outlet offshore tower at the reservoir site – added risks associated with youths trying to access the bridge, or jumping/ diving off it, risk of youths and others trying to swim out to the offshore tower, with additional risk associated with the recycled effluent inlet pipe and outlet pipe to Otterbourne operating 356 days a year.
- Infrastructure associated with the pipelines/ tunnels – shaft access points, air valves, washouts and manholes in areas of public open space and residential areas.

Increased health & safety risks associated with more frequent drawdown events; The scheme proposes to deliver much greater volumes of water to Otterbourne in a drought. That means that there will be more rapid and more frequent drawdown events. The risks associated with this need to be considered in the assessment.
- More frequent exposure of wet mud.
- More frequent exposure of infrastructure such as pipes and apparatus associated with the water mixing system.

P. Traffic & Transport

Engagement regarding impacts on walking, cycling & horse-riding routes; It is not clear in Section 17.3.4 that engagement is taking place with relevant interest groups. This will be especially important in the vicinity of the Havant Thicket Reservoir, Broadmarsh (WRP) and along the pipeline routes through Havant & Bedhampton where there is currently a lot of public access and where works will take place over several years causing significant disruption to public access routes. Interested local stakeholders representing local and national user group organisations can be contacted through the Portsmouth Water reservoir stakeholder group. As the impact will take place over several years causing significant disruption, Southern Water should work with local user groups to identify enhancements that can be provided as part of the reinstatement, or on adjacent sites.

The Study area should include the Havant Thicket Reservoir Site, as it will be impacted by infrastructure works, but is not included in Section 17.14.1. Any construction traffic should access the site from the north via the A3(M), B2149 and new northern access road.

The study area should be extended to include Old Bedhampton and the historic Conservation Area; Not specifically mentioned as a sensitive receptor, although some local road names are. The impacts of traffic on the very narrow lanes in this area is likely to be significant and very difficult to mitigate, especially given the need to construct more than one tunnel shaft in the area, with the duration of construction likely to span several years. Detailed assessment of the risks and mitigation measures will need to be considered as part of the EIA. Note regarding Engagement; There is an active local group looking after the interests of the Bidbury Mead Recreation Ground and they should be contacted at the earliest opportunity to ensure all of the concerns and impacts are understood and considered in the EIA.

Q. <u>Water Environment</u>
Engagement; Section 18.3 describes stakeholder organisations that have been contacted and involved in preliminary meetings. Other organisations that it would be useful to include in the engagement process.

- The Langstone Harbour Board do not appear to have been identified and contacted. As a key stakeholder for Langstone Harbour it is important that they are included in the engagement.
- Solent Protection Society.
- Royal Society for Protection of Birds – Langstone Harbour Officer
- Friends of the Hermitage Stream (including for the Water & Wildlife Interest Group)

Groundwater impacts; Not mentioned, but there is potential for artesian water to cause flooding, with the risk of both water and silt being brought to the surface. This can be expected to be a problem in the Bedhampton area, but may also be a problem elsewhere. The artesian nature of the aquifer(s) in some areas should have been flagged as important background information on page 474.

The potential for artesian water and associated risks should also have been highlighted in Appendix 18.1, Table 3.3, Conceptual Model for proposed underground pipeline between WRP and Havant Thicket Reservoir. It would also be relevant to include in Table 3.2 and 3.4.

Study area for assessment of impacts; Section 18.4.4 stated "This modelling study considered the potential effects the Proposed Development would have on biological oxygen demand (BOD), chemical oxygen demand (COD), suspended solids concentrations (SSC), salinity, iron and total nitrogen for two flow scenarios; 5 mega litres per day (Ml/d) and 15Ml/d. **The model results indicated that effects (albeit very minor ones) could potentially occur within the Solent as far as Southampton Water and within Portsmouth, Langstone and Chichester Harbours.** Whilst the modelled scenarios do not reflect the current proposed peak outputs of up to 60 Ml/d (and will not be directly used to inform the ES), the modelling work enables an indicative study area and likely scale of effects to be defined".

- It is important to recognise that the daily flow has now increased substantially with Southern Water indicating that it will now be 20Ml/d.
- The modelling needs to be updated to take into consideration the higher daily volume and peak volume to ensure that the study area for the EIA and HRA covers all of the coastal areas that could be impacted.
- Defining the correct study area will also be important when determining projects & developments that could have an in-combination or cumulative effect. For example, other effluent recycling schemes on the Isle of Wight, at Littlehampton, as well as coastal protection works.

Efficiency of the treatment process- how will this be determined?
What assumptions will be made in the water quality modelling and EIA in relation to operational efficiency/ effectiveness of the water recycling plant?

- What is the reasonable worst case?
- How will that be assessed?
- How is the increased risk of turbidity at Budds Farm WWTW being assessed? Noting that this was flagged by Southern Water as giving rise to issues with final effluent quality (Gate 2, Annex 3, pg 239)
- There needs to be full disclosure of all relevant water quality data to the consultants, not just the provision of summary or average data.
- Consideration also needs to be given as to whether sufficient data has been obtained from the trial recycling plant at Budds Farm WWTW, especially given that it was only in place for a short period of time.

Water bodies potentially at risk associated with changes to the Eastney Long Sea Outfall discharge; Water bodies at risk are listed in Table 18-6 on page 472/473. Portsmouth Harbour

and Chichester Harbour are listed but Langstone Harbour is not. Langstone Harbour is at risk as highlighted in the text extracted above in bold and should be added to Table 18-6.

- **Langstone Harbour should be added to the water bodies at risk.**

Baseline condition for WRP; It is surprising that the baseline text on page 470/471 for the WRP does not mention the presence of the dilute and disperse landfill site on which the WRP is to be constructed. Development on the landfill presents a significant risk of mobilising contaminants to all of the water bodies described including Hermitage Stream, Langstone Harbour as well as the secondary and primary aquifer below the site. Other pollution risks to the waterbodies are mentioned in the text, but not the risk from the landfill.

- **The risk associated with the dilute & disperse landfill at Broadmarsh must be included.**

Additional pathways associated with the Broadmarsh uncontained landfill site; The Preliminary Hydrological Impact Assessment (Appendix 18.1) Section 2.2 does not recognise the fact that the Broadmarsh dilute and disperse landfill is constructed over the original natural route of the Hermitage Stream channel, nor other historic creeks. This is relevant to the background information as they will form preferential pathways from the landfill to the internationally important harbour. The depth and permeability of the material in these channels will be variable and activities associated with construction (piling, shaft excavation etc.) have the potential to reactivate old pathways and open up new ones. Depending on the nature of the materials in the channel/ creeks movement through these channels may be tidally influenced, increasing the risk of these new pathways impacting the harbour.

Changes to baseline not recognised for Hermitage Stream catchment; Section 18.5.75 states that the new reservoir has been designed to maintain flows in Riders Lane Stream, and the watercourse will not be directly altered downstream of the new embankment and associated discharge infrastructure. This is not correct. To mitigate and compensate for the loss of the streams present at the reservoir site Portsmouth Water are required to carry out works in a number of reaches downstream to remove the concrete channel and re-naturalise the streams in a scheme to be agreed with the EA. This will be delivered through a Section 106 agreement that has already been signed.

- **The EIA needs to consider the modified baseline which result from the mitigation & compensation works which it is known will take place downstream of the reservoir.**

Baseline condition for the Havant Thicket Reservoir must be included; Page 481/482 does not provide any information on the baseline condition of the reservoir as a surface water body filled with water from the Havant & Bedhampton Springs. It is important to identify the baseline as it has planning permission, is under construction and will be impacted by the effluent recycling proposal.

The Havant Thicket Reservoir is not shown as a surface water feature on Figure 18.1 (sheet 1). Nor is the future abstraction from the reservoir shown on Figure 18.5 (sheet 1 & 2). Both these features will be in place before the effluent recycling scheme is implemented and therefore do form part of the background for the scheme and need to be considered in the EIA.

Water bodies relevant to Havant Thicket Reservoir; Page 482/483 does not mention the existing water body at Upper Lake which will be lost under the original reservoir which has planning permission.

Flood risk associated with the Havant Thicket Reservoir; Page 483 describes the current flood risk at the reservoir site but does not mention the reduced flood risk that will exist once the reservoir is in place. Nor is the requirement for emergency drawdown mentioned or how that will be achieved. This is pertinent as if the effluent recycling scheme proceeds the emergency discharge water will comprise a mix of recycled effluent and spring water, which is a significant change.

Figure 18.8 (sheet 1) does not show the flood extent for emergency drawdown from the reservoir along the Hermitage Stream catchment. This does need to be considered.

Pollution risks to groundwater; Section 18.6.8 describes the risk from any activities that disturb the ground, such as excavation, tunnelling or piling, which could mobilise contaminants within soils or groundwater, and potentially adversely affect groundwater quality or locally alter the hydraulic properties of the aquifer, which in turn would impact groundwater-dependent features such as abstraction points. The following significant risks should be highlighted for specific consideration in the EIA.

- The risk to the Havant & Bedhampton Springs which is Portsmouth Water's largest and most important water source.
- The significant risk development of the WRP on a dilute & disperse landfill site at Broadmarsh poses to groundwater, through piling and tunnel/ shaft construction.
- Given the groundwater flow in the aquifer is to the south and springs emerge under Langstone Harbour the additional risk the WRP poses to the harbour SPA/SAC.

Changes to water quality in the reservoir; It is not really clear on page 486 that the mix(ratio) of spring water to recycled effluent in the reservoir can vary considerably depending on the operating regime (turnover) at any given period in time. It is unclear what operating scenarios for the effluent recycling plant and reservoir drawdown will be assessed. The full range of operating scenarios need to be modelled and assessed in the EIA as it cannot be assumed that the highest and lowest inputs would create the reasonable worst case scenario, it could be a different combination of inputs and outputs.

- Ranging from no recycled effluent input to the base flow in operation (currently stated to be 20 Ml/d but previously stated to be 5, 7.5 or 15Ml/d), through a range of flows in to the reservoir up to 60Ml/d.
- From the baseline transfer to Otterbourne currently stated to be 20 Ml/d (but previously stated to be 5, 7.5 or 15Ml/d), through a range of flows out of the reservoir up to 90Ml/d.
- The period of operation of the scenario will also be relevant to the impact on habitats and biodiversity, including consideration of the impacts of consecutive year droughts.
- The impact of blending ratios on modelled water quality under different operating scenarios including 1 in 200 & 1 in 500.

There is no information in the assessment methodology on page 489 as to how water quality impacts in the reservoir are to be assessed. Nor is the range of assessment scenarios during operation set out on page 496. When considering water quality impacts in the reservoir, downstream and in the harbour the full range of scenarios (as described above) must be assessed. Section 18.7.46 provides a brief statement to say the modelling will consider a range of water quality parameters and will examine a range of scenarios for the proportion of water from different sources, but there is no detail.

As well as standard parameters such as metals, BOD, COD, pH and ammonia, it is important that the assessment considers;

- Pollutants in sewage such as endocrine disrupters.
- Treatment/ disinfection bi-products such as bromate and phosphates

Impact of quicker turnover and reduced residence time in the reservoir; The original spring fed water quality modelling highlighted that due to the long residence time in the reservoir, some compounds (eg. nitrates present in the spring water) would naturally breakdown reducing their potential environmental impact. If residence times in the reservoir are less at any time due to an increased turnover in water under any of the potential operating regimes for the new scheme the impact of reduced residence time needs to be considered.

Impact of treatment failures on the reservoir & downstream; SW Gate 2, Annex 3, Page 12, indicated that as the reservoir is an environmental buffer it provides the following benefits.

- Provides time to respond to potential treatment failures.
- Allows additional opportunity for attenuation of microbial and chemical contaminants.

While this may give increased confidence in terms of drinking water quality, as recycled effluent is not supplied direct to the tap, it provides increased environmental risk to the reservoir.

- **How will the pollution risk be assessed in a meaningful and robust way in the EIA?**

Noting that Southern Water have a very poor track record on pollution incidents and undertaking the necessary maintenance to prevent incidents occurring at their treatment facilities. Given that this treatment process is a new technology to the UK and both the local community and many stakeholders have made it clear that the public do not trust Southern Water to undertake the necessary maintenance to stop membranes becoming fouled and replacing them regularly, it is important that the EIA addresses the risks in a transparent and robust way.

Risk of accumulation in sediments and bioaccumulation; There does not seem to be any text relating to how the risk of elements or compounds accumulating and bio-accumulating in the reservoir will be assessed? Thought also needs to be given as to whether the introduction of recycled effluent (which will include treatment biproducts) could result in the formation of compounds, coagulate to form particulates, or colloids, that then can settle out on the reservoir bed causing a build-up in contaminants of concern.

- **Specialist advice needs to be provided on what parameters in the final effluent could accumulate in reservoir sediments, or bio-accumulate, so the risks can be properly assessed.**
- If any such risk is identified then potential for re-mobilisation of such sediments and particulates needs to be considered in the assessment (eg. from wind/ wave action, emergency drawdown).

For example, remobilisation and exchange of phosphorus was a key concern that needed to be considered and assessed for the original spring fed reservoir water quality modelling.

Change in trophic status and risk of dead spots with poor mixing; There does not seem to be any text relating to how the risk of changes in trophic status and dead spots in the reservoir will be assessed?

Change in the risk of algal blooms; There does not seem to be any text relating to how the risk of algal blooms will be assessed. The risk of algal blooms in the reservoir was low under the original spring fed reservoir proposal which was very different to most lowland reservoirs. The risk may be dependent on ensuring there are no dead spots in the reservoir, but it is not clear how this will be modelled and assessed.

- Any change to the risk of toxic blue green algae forming in the reservoir should be considered.

Times of need for such a drinking water drought resource and the resultant drawdown events are most likely to occur in the summer/autumn. This is when larger volumes of recycled effluent may also be used to top up the reservoir. This will coincide with when the risks of adverse impacts such as eutrophication, stratification and algal blooms are most likely to occur. **How will these combined risks be assessed?** The water quality modelling for the original reservoir showed the importance/impact of reservoir drawdown and filling events. The greater volume of water to be abstracted from the reservoir, along with the increased frequency of events, all add to the risks that need to be assessed in the EIA.

Location and method of mixing recycled effluent with spring water in the reservoir is not specified; There is no information to indicate where the inlet for the recycled effluent and outlet for the Otterbourne transfer pipeline will be. It is assumed that they will both be incorporated within the newly proposed tower offshore from the reservoir embankment close to the control house where the water will be deep. It is also not clear how the water will be adequately mixed to mitigate water quality issues and other problems such as stratification. Both the recycled effluent inlet pipe and Otterbourne outlet pipe need to operate 365 days a year to keep the sweetening flow through the plant and pipelines (20 ML/d). If both pipes are to be located in the offshore tower, how will the flows be kept separate until adequate mixing has occurred?

- **More information needs to be provided on where the inlet and outlet pipe will be located and how the recycled effluent and spring water will be mixed in the reservoir, so that the construction and operational impacts of this infrastructure can be considered and assessed within the relevant chapters of the EIA for construction and operation.**
- Will drawdown events and lower water levels around the offshore tower impact the methodology or frequency of mixing in any way?
- In addition to the water environment & biodiversity assessment it may also be relevant to the Landscape & Visual Impact Assessment (including visibility of the mixing apparatus during drawdown events), and the increased energy and carbon impact of operating the mixing system every day for the life of the scheme (100 years).

Impact on the reservoir wetland; While the wetland is to be held back behind a retaining structure during drawdown events, the reality is that for most of the time the water level in the reservoir will mean that there is hydraulic continuity between the reservoir and the wetland. Recycled effluent will mix with spring water and flow into the wetland.

- How will any potential impact on the wetland be assessed?
- There is more risk of dead spots or incomplete mixing in the wetland, how does this impact the assessment? This needs to be specifically considered in the modelling and assessment.
- How will the change in water quality and frequency/ speed of drawdown events impact the wetland habitats and species?

Loss of a very unique opportunity to create a chalk spring fed reservoir; The reservoir was to have been filled with naturally filtered cool chalk spring water. This would have created a fantastic and unique biodiversity opportunity to develop a very special ecosystem, as Portsmouth Water and its consultants could not find another one anywhere.

- How will the loss of this unique and special biodiversity opportunity be assessed in the EIA?

Note: If the proposed mitigation will be to re-mineralise the recycled water so that it will have the same geochemistry as the spring water, the wider impacts of that significant additional treatment need to be adequately considered in other chapters of the EIA. For example, in terms of the resources and energy to be consumed for the additional treatment, which adds further to the unsustainability of the scheme.

What impact will changes in salinity have on the reservoir, retained wetland and downstream?
Budds Farm WWTW has a saline intrusion problem. The effluent recycling treatment process will not remove all of the salt. This prevented the EA from allowing the recycled effluent to be discharged into the River Itchen. If it was too risky for the environment to discharge the recycled water into a flowing river, what impact will it have on the reservoir where there is very little flow?

- How will the impact of salinity be assessed in the EIA?
- What receptors need to be considered in the assessment?

What impact will changes in temperature have on the reservoir, wetland and downstream?
The final effluent from Budds Farm WWTW has an unnaturally high temperature, as will the recycled effluent from the WRP which is to be discharged into the reservoir.

- How will the impact of warmer water be assessed in the EIA?
- What receptors need to be considered in the assessment?

Note: If the recycled effluent is to be cooled prior to discharge into the reservoir to mitigate the impact, the additional energy and carbon impact of this needs to be considered in other chapters of the EIA.

Scoping out operational impacts on surface waters & groundwaters is <u>not</u> appropriate; Section 18.6.24 indicated that this can be scoped out because any routine intrusive maintenance

work will be small scale and localised. For example, associated with limited localised excavation to allow repairs to subsurface infrastructure. The small spatial extent and limited duration of likely future maintenance activities means that significant effects on surface water catchments and underlying groundwaters are considered to be unlikely. This will not always be the case with examples provided below.

- Risks associated with maintenance or repairs that require ground excavation at the dilute and disperse landfill site on which the WRP will be constructed.
- Failure to adequately maintain the treatment process, membranes, monitoring equipment and control systems associated with the WRP could result in unacceptable discharge of pollutants into the reservoir, with risk of ecological impacts, bioaccumulation or accumulation in sediments. The latter could be re-mobilised at a later date by wind or wave action.
- During emergency drawdown testing and full emergency operation.

This demonstrates that operational impacts on surface waters and groundwater do need to be considered in the EIA.

It is also worth noting that water quality modelling for the original spring fed reservoir demonstrated that there would be a clear improvement in downstream water quality.

- **The EIA should consider whether the downstream improvement in water quality will be maintained compared to the original spring fed reservoir proposal.**

Increased sediment supply should not be scoped out during operation; Section 18.6.25 proposes this and it is not appropriate. Maintenance of the pipeline and flushing to washouts could cause an adverse impact and should be assessed within the EIA. The risk of sediment mobilisation during emergency drawdown also needs to be considered, especially given that the concrete channels lining the Hermitage Stream will largely have been removed by the Portsmouth Water S106 works.

Modelling impacts of the discharge of reject water from the effluent recycling plant via the LSO; Section 18.7.11 sets out the parameters to be included in the modelling.

- Will temperature impacts also be modelled?
- Treatment chemicals and cleaning agents will be present in the reject water from the WRP that will be transferred to the LSO for discharge into the Solent. What additional parameters need to be modelled to assess any potential impact from these? (Section 18.7.12 refers). For example; disinfection byproducts such as bromate and phosphates.

Peer review of modelling to provide confidence in outputs used in the EIA; There is a lack of public trust in Southern Water to complete the necessary modelling with respect to water quality impacts for the reservoir and long sea outfall. This is fundamental as the modelling outputs will be used in the EIA. How will the modelling methodology, parameters, scenarios and outputs be independently peer reviewed to give confidence that the EIA will be based on meaningful data and identify the reasonable worst-case scenario?

Coastal waters are a receptor that should be considered; Section 18.7.13 describes types of receptor to be considered but does not appear to include coastal waters?

Loss of nitrate benefits to Langstone Harbour; There will be significant benefit to Langstone Harbour from reduced nitrate loading when spring water elevated in nitrates is diverted to the reservoir under the original spring fed reservoir design, to keep the reservoir topped up at the end of each summer to address seasonal and compensation discharge losses, or to refill the reservoir after a drawdown event(s) through the autumn and winter. Water quality modelling submitted with the original planning application showed a significant reduction in nitrates entering Langstone Harbour, which would be very beneficial in helping to reduce eutrophication and algal blooms in the harbour, an environmental priority for the SPA/SAC. There is a concern that some of this benefit will be lost if effluent recycling goes ahead. This is because less spring water will be needed to top up the reservoir each winter, or after a drought, if the recycled effluent has already been pumped up to the reservoir to maintain the capacity of the reservoir as a drought resource.

- **The potential loss of nitrate benefit to Langstone Harbour needs to be fully assessed in the EIA, with the modelling peer reviewed by the specialist who did the original water quality modelling for the spring fed reservoir.**

Deterioration in source water at Budds Farm WWTW; Documents published by Southern Water have confirmed that they expect the water quality at Budds Farm to deteriorate with time. They also indicate that there will be more industrial and commercial waste discharged into the works. This is not mentioned in the scoping and there is no indication as to how this will be assessed.

- **The predicted deterioration in expected source water quality at Budds Farw WWTW should be considered as part of the EIA.**
- **It is essential that there is full disclosure by Southern Water to the consultants undertaking the water quality assessment and EIA about likely future changes at Budds Farm WWTW.**
- **Any infrastructure changes at Budds Farm to address this risk also need to be considered in the EIA.**

Noting that SW Gate 2 Annex 3, page 16, 2.2.1.3 refers to the need for additional source control at Budds Farm STW to manage the discharge of high loads of metal or other contaminants impacting upon treatment if poor quality effluent is transferred to the WRP. The text confirmed that this could pose public health and environmental risks not controlled at the source. This needs to be considered by a water quality & treatment specialist and more information provided by Southern Water so that the specialist can assess the reasonable worst case scenario on the reservoir and downstream.
Southern Water Gate 2 report (Annex 3, page 239, Table 74) highlighted issues with turbidity at Budds Farm WWTW, indicating these will lead to issues with effluent final quality. Further monitoring was indicated to be ongoing, and it was suggested further assets may be required to mitigate the risk.

Sewer catchment risk assessment; It is not clear what data from Budds Farm WWTW will be used in the water quality modelling. A risk assessment should be undertaken to identify the contaminants (chemical and biological) that can be present in raw sewage in the sewer catchment and need to be assessed. Not just relying on data for the parameters that are routinely monitored. The assessment should identify the contaminants that have the potential to survive the treatment process and in what concentration. This information should then be used to;

- Ensure that appropriate analysis data has been collected from Budds Farm WWTW to form the baseline. Is there enough data for all of the contaminants of concern?
- Ensure that appropriate analysis data has been collected from the trial effluent recycling plant.

There is a concern that the trial effluent recycling plant was only in position for a very short period of time and that not enough robust data will have been collected on which to base the assessment. The adequacy of the frequency of contamination testing should also be considered.

There is also a concern that where effluent recycling is used in drought-stricken countries abroad that international good practice is to identify and proactively reduce the risks in the catchment. Surprisingly Southern Water have indicated they have no intention of following this good practice. As a result, it is even more important that they understand the risks in the sewer catchment and ensure that the proposed treatment plant can address all of the risks all of the time.

R. <u>In-combination & Cumulative Effects</u>
The following plans, projects and developments need to be considered in the assessment:

- Aquind Interconnector (coastal and terrestrial)
- Bedhampton – housing & office developments on and around the Portsmouth Water springs
- Budds Farm WWTW – modifications & ongoing storm discharges & pollution incidents to harbour

- Cabbagefield Row, Warren Park – housing development alongside the reservoir site
- Coastal defence works – including any to defend coastal landfills
- Draft & final WRMP's for Portsmouth Water, Southern Water & South East Water including other effluent recycling & desalination projects and their discharges into The Solent (e.g. Isle of Wight and Littlehampton)
- Dredging activities
- Havant Thicket Reservoir (original spring fed reservoir) – including potential loss of benefits, pipeline route construction, emergency drawdown
- Hermitage & Park Lane stream improvements – S106 scheme to naturalise multiple reaches (P. Water)
- Housing/other developments allocated in Local Plans/ granted planning permission including; Amazon Havant, Campdown, Southleigh Park area & Wellbourne (potential cumulative impact on traffic and rare bats)
- Land East of Horndean (multiple areas / phases) – immediately north of the reservoir site

Accumulation impacts; Intra-project effects should include the accumulation of elements or compounds of potential concern in the reservoir water, sediments or bioaccumulation and how that could be remobilised to cause an impact (e.g. on water quality or ecology) as a result of a separate process such wind or wave action, maintenance, emergency drawdown. Plus compared to original reservoir proposal.

S. <u>Topics Scoped Out</u>

COMAH sites; Section 20.2.5 states that no COMAH sites have been identified within 4.5km. This seems to be an arbitrary limit. It would be more appropriate to look at whether these sites are hydrologically linked to waters that maybe impacted by the proposed development. For example, drain to or are adjacent to the coast. As indicated in IEMA Primer (Section 20.2.7) they should only be scoped out if there is no source-pathway-receptor linkage of a hazard that could trigger a major accident and/or disaster or potential for the scheme to lead to a significant environmental effect.

Shipping & Navigation; There is a gravel wharf on the coast at Harts Farm Way. The pipeline from Budds Farm WWTW to the WRP will pass below the wharf. Could any activity during construction or maintenance impact upon the wharf, or commercial activities there?

Annex B

Letter from Havant Borough Residents Alliance and Others to CEO of Southern Water, dated 29 July 2023

Chief Executive Officer,
Southern Water
Head Office
Yeoman Road,
Worthing,
West Sussex
BN13 3NX

Contact: Ann Buckley
Email: [redacted]@yahoo.co.uk

29 July 2023

Dear Mr Gosden

Concerns re Effluent recycling proposal via Havant Thicket Reservoir

Residents, community and environmental groups are objecting to Southern Waters (SW) plan for effluent recycling via Havant Thicket Reservoir. We are very concerned about a number of recent statements made regarding the proposal including:

- Misleading information provided in the SW WRMP update email dated 14 June 2023
- Failure to reconsult when WRMP19 preferred options could not be progressed
- Increase in daily volume of water to be treated and pumped to Otterbourne
- Information provided on SW's appalling track record on mains renewal.

We look forward to receiving a comprehensive response to our concerns.

Misleading information provided in the SW WRMP update email dated 14 June 2023

We were very disappointed to read in the update that; "the current preferred form of the scheme, recycling from Budds Farm into Havant Thicket Reservoir, was agreed with regulators in May 2022", giving the impression that this option was already approved and a 'done deal', even though the statutory public consultation process had not commenced (5/7/22 option consultation, 14/11/22 draft WRMP24). The truth is that at Gate 2 the environmental regulators and Ofwat all raised significant concerns about the lack of progress on the assessment of environmental impacts for this option, the options appraisal process, lack of information on the alternatives, with Ofwat even challenging issues around value for money. Passing through Gate 2 only confirmed that the option was to be considered further.

Please can you confirm that effluent recycling from Budds Farm via Havant Thicket Reservoir is not approved by the regulators and that the modelling and environmental impact assessments have not yet even been completed to understand the impacts on the reservoir or coastal protected sites. This should be made clear on your website and in future updates to SW/PW customers.

Failure to reconsult when WRMP19 preferred options could not be progressed

SWs update email 14/06/23 drew attention to the way in which your WRMP plan had changed since 2019. When the preferred desalination solution at Fawley and the alternative back-up solution of effluent recycling from Budds Farm to the River Itchen were both rejected by the regulators and proved to be undeliverable because they could not be consented, ***why did SW not complete a full review of all of the potential options and reconsult on your plan?***

By not re-consulting on the plan, you deprived stakeholders and the public of the opportunity to put forward and press for more sustainable alternative options and raise concerns about the selected option.

Water Resource Planning Guidance (2023) Section 3.9 indicates that ***if there is a 'material change' of circumstance you must prepare a revised draft plan for re-consultation***. Material changes include "new or significant changes to the measures that were identified in the published plan and are likely to have significant public or environmental interest". Any such material change in circumstances required a consultation exercise in accordance with the procedures set out in Section 37 B & C of the Water Industry Act. Specifically, SW would be required to publish the proposed revisions to its WRMP in a way '*calculated to bring it to the attention of the persons likely to affected by it*.' This should have included Portsmouth Water customers. SW have not done that.

The change in the plan triggered by the failure of the preferred and alternative option represents a 'material change' from the WRMP19 because:

- Both the preferred option in WRMP19 and the selected alternative back-up solution were rejected. The proposal to use the PW reservoir for effluent recycling was <u>not</u> a selected option in the plan. It is a 'new' option fundamentally different to discharging recycled effluent into a free-flowing river, as are the impacts that needed to be considered.
- Portsmouth Water (PW) customers would be significantly impacted by the change to direct recycled effluent to the Havant Thicket Reservoir. Not only because it materially changes PW's original spring fed reservoir proposal (requiring a new planning application and impact assessments), but also because PW customers would receive the recycled drinking water, a completely different source to that which they currently receive. Yet they were never consulted when this material change happened.
- The use of the reservoir as an 'environmental buffer lake' for this option is a material change. We believe that the environmental impact on the reservoir (geochemistry, salinity, temperature etc.) and coastal environment of the SW proposal is significant. Even now, two years on from SW's decision the modelling and environmental impact assessment has <u>not</u> been completed to understand the risks, with direct pathways to the internationally important coast not properly considered in the early assessments. As a result, it is not possible that in 2021 that the impact could have genuinely been assessed as insignificant, a precautionary approach should have been taken, triggering full re-consultation on the options.
- There will also be a significant environmental impact from the proposed siting of the effluent recycling plant at the Broadmarsh dilute and disperse landfill, including on the protected coastal habitats.
- The Fawley community were given many opportunities/years to comment on a number of consultations, including WRMP14 & 19. The community and customers impacted most by the effluent recycling via Havant Thicket Reservoir option have not been given that same opportunity. Even though the Water Industry Act Section 37B states it me publish the plan in way calculated to bring it to the attention of the persons likely to affected by it.
- The SW Gate 2 document flagged the risk of pursuing alternative options that were not in WRMP19, including the risk of appeal causing delays to the SW programme, which in turn will result in unnecessary delays to improved protection for the River Itchen & Test.

As a result, we do not believe that SW has followed the legally required statutory consultation process.

In fact, rather than recognising that PW customers were likely to be affected and making efforts to consult them, SW have actually tried to hide this impact. Any reference to the Havant Thicket Reservoir was redacted from the Gate 1 report published on the SW website. Even the 2022 consultation specifically on the Havant Thicket effluent recycling scheme failed to show in the process diagram, or text, that PW customers would receive the water via the Farlington WTW.

It is certainly not true for SW or PW to claim as they recently have that; information was shared openly and honestly at the time of the original reservoir planning application, or that much information was publicised by SW ahead of the original Planning Committees, with a consultation ending on 16/4/21. Statements like this just add to the mistrust in SW & PW. As active and informed local people we were not aware of any consultation on SW's plans in 2021 until after it was over, as there was no publicity in the PW supply area, nor at the reservoir site, even though both would be directly affected by the plans. In fact, having looked at the SW consultation document since, it was not clear that PW customers would be impacted by any of the effluent recycling options being considered as a back-up, even though they would be.

Increase in daily volume of water to be treated and pumped to Otterbourne

We are very concerned that SW claim that this is a sustainable solution, when clearly it is not. Effluent recycling has a much higher carbon and energy footprint during construction and operation than more sustainable options such as, moving the Otterbourne abstraction closer to the tidal limit, or winter storage in confined aquifers. However, SW did not assess many of these options as they were 'parked' in their options appraisal for review in 2029 (*a restricted document not made readily available to the public*).

The Budds Farm option is completely unsustainable as it is the furthest sewage works from where the water is needed by SW in the Southampton area. SW told us initially 2 and later 3 Olympic size pools of recycled water would have to be treated and pumped more than 40km 365 days a year to keep the plant and pipelines sweet, even when the water is not needed, as it is supposedly only needed as a drought resource. At a more recent event PW advised that the daily volume could be up to 20Ml/d, which is 8 Olympic size swimming pools to treat & pump every day of the year, even when not needed. The daily energy and carbon use will be enormous, making it completely unsustainable to operate. Flying in the face of the water company commitment to being carbon neutral by 2030.

Despite repeated requests SW have failed to provide information on the energy use and costs associated with the daily operation of the plant and pipelines to keep them sweet.

How can this option be assessed as a 'best value' option if you don't know what it will cost customers to operate on a daily basis, and when those costs will have changed so significantly as the goal posts keep moving in the wrong direction? With costs and impacts incurred daily even when the recycled water is not needed.

Southern Water's appalling track record on mains renewal

SW have confirmed that the annual rate of mains renewal over the past 5 years has been just 0.1% per annum. Meaning that a water main is unrealistically expected to last for 1000 years before it is replaced, this is totally ridiculous, when a more typical design life for a water main would be 100 to 120 years. In the SW supply area, more than 92 million litres per day of treated water is currently lost to leakage. By 2050 you propose to reduce this by just 50%, which means that you will still be **losing 46 million litres per day**, water which customers have paid to abstract and treat. SW will never get the appalling level of leakage under control unless you dramatically improve your performance on mains replacement, as any future action on leakage will be continually undermined by the ongoing deterioration of water mains. The statistics speak for themselves and demonstrate a clear lack of commitment to addressing leakage.

We demand that SW get their own house in order, stop wasting so much treated water and commit in both WRMP24 and the next 5-year Business Plan currently being developed to consistently deliver a much more challenging target for mains renewal closer to 1%.

SW are currently wasting six times (92 million litres per day) the amount of treated water that is proposed to be generated by the proposed effluent recycling plant in its initial phase (15 million litres per day).

Conclusion

We are extremely concerned that SW are pressing ahead with the scheme without appropriate and compliant public consultation, understanding the risks, and without considering more sustainable alternatives. When SW did finally consult in 2022 on this option your own report confirms that:

- 48% of respondents did not support effluent recycling via Havant Thicket Reservoir
- 46% of respondents did not support the SW options appraisal.

This despite the fact that SW made very little attempt to publicise the consultation in the area most impacted. It demonstrates quite clearly that there is not public support for this option. If the consultation had been more widely and appropriately publicised we believe the response against the proposal would have been much greater, especially amongst Portsmouth Water customers, who were largely unaware of the consultation, or that the proposals would impact them directly.

SW should have learnt the lesson of not putting all of its eggs in one basket for Hampshire from when the Fawley desalination option was rejected. Instead, SW should be looking at multiple, smaller, greener, cheaper solutions that work with climate change, not against it. We hope that SW will step back, take the opportunity to work with the regulators, to look genuinely at the alternatives available for an interim short- and medium-term solution, while the impacts and acceptability to customers of effluent recycling are more fully studied. If effluent recycling is to be part of the solution for the future other more sustainable options should be considered, which require shorter pipelines and less daily pumping. For example, not all of the potentially viable options associated with using the Peel Common WWTW have been explored in the SW options appraisal. More options from Peel Common need to be considered, not just option B5 that passed through Gate 2.

For your information I have attached a copy of a letter with concerns and questions sent to PW. We look forward to receiving your response to our questions.

Yours sincerely,

Ann Buckley

on behalf of:

Havant Borough Residents Alliance
Havant Civic Society
Havant Climate Alliance
Rowlands Castle Parish Council
Effluent Awareness Group
Friends of the Earth (Havant)
Hayling Sewage Watch

Proposed DCO Application by Southern Water Services Limited for Hampshire Water Transfer and Water Recycling Project

Royal Mail response to ES Scoping Consultation

Under section 35 of the Postal Services Act 2011, Royal Mail has been designated by Ofcom as a provider of the Universal Postal Service. Royal Mail is the only such provider in the United Kingdom. The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service.

Royal Mail's performance of the Universal Service Provider obligations is in the public interest and should not be affected detrimentally by any statutorily authorised project. Accordingly, Royal Mail seeks to take all reasonable steps to protect its assets and operational interests from any potentially adverse impacts of proposed development.

Royal Mail's advisor BNP Paribas Real Estate has reviewed the ES Scoping Report for this scheme dated July 2023. There are approximately ten operational Royal Mail properties within 10 miles of the proposed DCO application site.

The construction of this infrastructure proposal has been identified as having potential to impact on Royal Mail operational interests. However, at this time Royal Mail is not able to provide a consultation response due to insufficient information being available to adequately assess the level of risk to its operation and the available mitigations for any risk. Consequently, at this point Royal Mail wishes to reserve its position to submit a consultation response/s at a later stage in the consenting process and to give evidence at any future Public Examination, if required.

In the meantime, any further consultation information on this infrastructure proposal and any questions of Royal Mail should be sent to:

Holly Trotman ([redacted]@royalmail.com), Senior Planning Lawyer, Royal Mail Group Limited

Daniel Parry Jones ([redacted]@realestate.bnpparibas), Director, BNP Paribas Real Estate

Please can you confirm receipt of this holding statement by Royal Mail.

End

17 August 2023

The Planning Inspectorate
Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol, BS1 6PN

Sent via email only

Your Reference: WA010002-000010-230725

Dear Ms Shoesmith,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by Southern Water Services Limited for an Order granting Development Consent for the Hampshire Water Transfer and Water Recycling Project – EIA Scoping Consultation

Thank you for your letter dated 25 July 2023, requesting comments from the South Downs National Park Authority (SDNPA) on the applicant's report that accompanied their request for a Scoping Opinion from the Secretary of State.

General Comments

Whilst our comments relate to the Scoping Report as a whole, where discrete aspects of the scheme are discussed within the topic-specific chapters, the SDNPA has focused on the 'Proposed Underground Pipeline between Havant Thicket Reservoir and Otterbourne Water Supply Works' and the 'Above Ground Plant'. These are the aspects of the scheme that are proximate to the SDNP.

The introductory chapters are largely silent on the National Park designation, other than to acknowledge the SDNPA as a local planning authority. We would like to remind Southern Water of their duty under Section 62 of the Environment Act 1995, which is the duty of public bodies to have regard to the statutory purposes of the National Park designation. These statutory purposes are to:

- Conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park; and
- Promote opportunities for the understanding and enjoyment of the special qualities of National Parks by the public.

This should be explicitly reflected in Chapter 2 (Planning Legislation and Policy), which would help set the context for the topic specific chapters. Furthermore, Figure 1.2 should include the SDNP boundary as well as the other district boundaries. No consideration has yet been given to the Special Qualities for which the National Park has been designated and there is no reference anywhere within

the Scoping Report to the South Downs National Park Partnership Management Plan 2020-2025 (for which Southern Water are a listed partner). These are significant oversights, as they help set the context for how impacts on the National Park should be assessed.

Several sections of the pipeline corridor and above ground plant run in close proximity to the SDNP boundary, where we would describe it as falling within the setting of the National Park. The National Policy Statement for Water Resources (NPSWR) paragraph 4.9.5 advises that any application for development consent within, or to affect land in, a National Park …would need to comply with the respective duties listed above. Therefore the duty to have regard to National Park purposes would also apply to those works within its setting. Again, this needs to be better reflected in the overall approach taken within the Environmental Impact Assessment.

Paragraph 3.1.6 notes that the scoping area has been drawn widely enough to allow for flexibility to aspects of the design and as such, includes an area within the SDNP boundary. The NPSWR makes clear that development consent should be refused in National Parks except in exceptional circumstances where it can be demonstrated that the development is unavoidable and in the public interest (paragraph 4.9.12). The proposals are then discussed in greater detail, including the proposed construction methods (para's 3.5.4 – 3.5.15) which include both open-cut and trenchless crossing options. It has not been specified that open cut methods will be discounted within the SDNP and therefore it is expected that all assessments of impacts will be on the worst-case scenario basis of this method for impacts within the National Park. Similarly, it has not been clarified whether any above-ground equipment is needed in the SDNP for operational and maintenance purposes, such as air or isolation valves (para's 3.6.7 – 3.6.14). Whilst these may be small in nature, the impact of their presence should still be accounted for and considered in the relevant chapters.

No details have been provided with regard to the Temporary Construction Hub location. It is acknowledged that this is to enable flexibility and would look to repurpose an existing site. The location of this may have further impacts on the SDNP, particularly as a result of traffic movements and/or any potential alterations to ensure the site is fit for purpose. Further clarity on this aspect of the proposal should therefore be provided and properly assessed.

The following table provides the SDNPA comments in relation to the topic-specific chapters of the report.

Para No.	**Text**	**Recommended Action**
Chapter 7 – Cultural Heritage		
General	Archaeological mitigation – reliance of deposit capacity. South East England has little/no capacity for additional storage of archaeological depositing	This needs to be taken into consideration and further mitigation measures applied.
Table 7.4	Grade II Listed Buildings have been categorised as being of 'regional importance'. This conflicts with legislation, as Grade II indicates national importance.	Re-categorise within table and increase significance accordingly (i.e. national importance)
Table 7.4	No consideration / mention of non-designated heritage assets within the table – not all will be on local lists.	Add reference to non-designated heritage assets.
Chapter 8 – Terrestrial Ecology		

Table 8.1	South Downs Local Plan Policies – SD45: Green Infrastructure is also highly relevant.	Please include reference to policy SD45.
8.8.26	In-combination effects	Please include in-combination with landscape as a potential effect.
Chapter 10 – Climate Change		
	Have only listed a single receptor – NB the global atmosphere.	The SDNPA has also calculated its own carbon footprint and produced a Climate Change Action Plan. We would welcome consideration of this, as this is a more local receptor.
Chapter 12 – Land Use and Agriculture		
General	The National Park is not a land-use, it is a landscape designation and therefore reference to whether it is within the National Park or not, is not specific to this chapter. It is suggested that this matter needs to be more clearly discussed in the Proposal and Alternatives chapters.	
Chapter 13 - Landscape and Visual Impact		
General	Landscape receptors have not been appropriately defined and are not supported as proposed in Table 13-13. The scale of receptor is too large for the scale of development and so effects are likely to be underestimated. Effects should be assessed per landscape element (e.g. woodlands, rivers/streams/drainage, fields, roads and settlements). Further specific points can be found below. The value of these can then be determined using their roles, history and context.	
13.2.1 and 13.2.2	Relevant legislation regarding landscape	This legislation also defines the term 'landscape', which is the same definition included in the South Downs Local Plan. Recommend it is referenced specifically and applied through the EIA.
13.2.7-13.2.9 and 13.2.15-13.2.16	Response to National Policy Statement and NPPF reference to National Parks "the LVIA will assess the likely effects on the SDNP…and [its] designation".	This statement fails to reflect the content of the policies which make reference to limiting development within designated landscapes and sensitively locating and designing proposals in their setting. A more active response to this is expected with links to setting and value.
Table 13.9	Relevant National Park Policy and Guidance	Please also include policies SD17 (Water Environment) and SD45 (Green Infrastructure) Reference should also be made to the Partnership Management Plan, Tranquillity Mapping and the Viewshed Study Report of the National Park.
Table 13.11	Baseline Data	No baseline evidence has been listed concerning soils or water. Whilst appreciated these may be picked up discretely in other chapters, they are integral to consideration of landscape character. No baseline evidence is included for historic landscape character. Again, whilst this may be included in Cultural Heritage, such evidence is integral to understanding landscape character.
13.5.11	Maps and schedule of the LLCA were issued to local planning authorities for comment in June 2023.	Schedules have not yet been issued to the SDNPA for the LLCA – our previous comments were given with this caveat.
13.5.12	Visual Baseline	Whilst receptors are agreed, we would expect the Visual Baseline to understand the character of the views. This is set out in the SDNPA Viewshed Study Report mentioned above.

13.6.3	Temporary construction effects include removal of trees with Tree Preservation Orders (TPO), veteran or ancient trees or protected hedgerows.	Do not agree that removal of these would be a temporary effect. This would clearly amount to a permanent change.
13.6.3	Disruption to the landscape pattern and tranquillity.	As per the general point made above, as this has not been defined, it will be difficult to assess the potential disruption. Further clarity is therefore needed.
13.7.5-13.7.11	Assessment of Landscape Baseline	This section moves straight to sensitivity of landscape receptors, but has not scoped the receptors in accordance with Guidance for Landscape and Visual Impact Assessment GLIVIA3 [3.11]. Receptors should not be whole Landscape Character Areas or Special Qualities, unless the scale of change is so significant to warrant it (which it is not in this case). See general point above.
13.7.21	For a landscape without statutory status to be considered valued landscape in the context of the NPPF it must be supported by strong evidence. The LVIA will therefore consider each of the criteria set out in Table 13-13, references in Local Plan policy and evidence base, including whether there are existing local landscape designations in forming an overall judgement. Landscapes with high value may also be considered valued landscape.	No reference has been made to setting of the National Park. Setting needs to be scoped in and defined upfront and a method for establishing the extent, agreed. We would expect this to be included as part of the LVIA. Further explanation of how the consultation process has helped to determine what landscapes are valued by the community should also be provided.
Chapter 14 – Noise and Vibration		
14.4.7 Table 14.3	Baseline mapping data does not include SDNPA Tranquillity mapping.	Tranquillity mapping data should be included. Please note, this should also be linked to Chapter 13.
14.4.25	"At some locations, the Scoping Area is less than 300m from the South Downs National Park. The South Downs National Park is likely to be considered a "tranquil area" as per paragraph 185 of the NPPF"	Make reference to National Park Special Qualities – particularly 'Tranquil and Unspoilt Places'. Also ensure consideration given to the part of the route potentially within the National Park, not just nearby.
14.6.6 Table 14.4	Example receptors with 'high' sensitivity include National Parks, but only during the day.	Please clarify why the high sensitivity is only limited to day time. Consider this should not be restricted, unless the difference is night hours being 'very high' sensitivity.
Chapter 16 – Socio-economics, Tourism, Recreation and Health		
16.6.2	Relevant Legislation	This should also include the Environment Act 1995, which sets out the purposes of National Parks (one being understanding and enjoyment).
16.4.9	"It is acknowledged that the Proposed Development is, in places, in proximity to the boundary of the South Downs National Park (SDNP). There is one area, near Colden Common, where the Preferred Pipeline Corridor may	Specific reference should be made to National Park Purposes as well as the Special Qualities of the SDNP.

	encroach on the SDNP, and there are other areas where the SDNP falls within the 500m buffer of the Proposed Development. The scoping assessment has therefore considered the potential for impacts on tourism and recreation within the SDNP."	
16.6.12	"It is proposed that impacts on tourism in the South Downs National Park (SDNP) are scoped out of this assessment."	It is not correct to treat the SDNP as a single receptor. Individual receptors within the SDNP have been identified and impacts on these should instead be assessed alongside the National Park Purposes and Special Qualities, rather than the National Park as a whole being assessed. Also consider that some of the affected Public Rights of Way may act as gateways to the National Park and therefore this impact may also need to be considered. This is a strong link to the perceptual qualities discussed in Chapter 13 (Landscape and Visual Impact).
Chapter 17 – Traffic and Transport		
17.6.7	The construction of permanent infrastructure such as the proposed Intermediate Pumping Station and Break Pressure Tank may require permanent diversion or closure of some public rights of way (PRoW).	Further clarification of which PRoW may be closed should be provided. Links to Chapter 16 and possible in-combination effects. See also comments below re 17.10.1.
17.6.9 and 17.8.2	Reference to staff travel arrangement and location of construction compound sites	Mitigation measures should include bicycle storage facilities and a worker travel plan to avoid and/or minimise single occupancy vehicle movements.
17.10.1 Table 17.8	Severance has been scoped out for operation phase.	Closure of PRoW has been noted in paragraph 17.6.7 – until this has been discounted, it is suggested that operational severance should not be scoped out.

We trust the information above will be of assistance to the Secretary of State in forming their scoping opinion. We would welcome the opportunity to continue working with the applicant in order to resolve the issues raised in our response. If you have any queries regarding the above please contact Vicki Colwell, Principal Planning Officer on [redacted] or [redacted]@southdowns.gov.uk.

Yours sincerely

[redacted]

Vicki Colwell
Principal Planning Officer
South Downs National Park Authority

Tel: 03456 009 009
Email: planning.consultations@surreycc.gov.uk

Your Ref: WA010002-000010-230725

SURREY
COUNTY COUNCIL
Quadrant Court
35 Guildford Road
Woking
Surrey GU22 7QQ

The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

By email only:
hampshirewaterproject@planninginspectorate.gov.uk

28 July 2023

Dear Sir/Madam,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by Southern Water Services Limited (the Applicant) for an Order granting Development Consent for the Hampshire Water Transfer and Water Recycling Project (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

Thank you for consulting Surrey County Council on the above EIA scoping consultation.

Given that the EIA scoping boundary involves land situated in the southern area of the county of Hampshire and does not extend into Surrey, the scheme is unlikely to have a material impact on the county of Surrey or its residents.

Consequently, I can confirm that we have **no comments** to make.

I trust the above is self-explanatory. However, should you have any questions or require further information please do not hesitate to contact me.

Yours sincerely,

[redacted]

Spatial Planning and Policy Manager

Feekins-Bate, Laura

From: Stephen Vanstone <[redacted]@trinityhouse.co.uk>
Sent: 21 August 2023 16:17
To: Hampshire Water Project
Cc: Trevor Harris; Amel Mesbah
Subject: RE: WA010002 - Hampshire Water Transfer and Water Recycling Project - EIA Scoping Notification and Consultation
Attachments: WA010002 - Statutory consultation letter.pdf

Good afternoon Laura/Marie,

I can confirm that Trinity House is content for Shipping and Navigation to be scoped out of the assessment for inclusion in the Environmental Statement, as any impact appears to be negligible. Therefore, we have no further comments to make concerning this project.

Kind regards,

Stephen Vanstone
Navigation Services Manager | Navigation Directorate | Trinity House
[redacted]@trinityhouse.co.uk | [redacted] & [redacted]
www.trinityhouse.co.uk

TRINITY HOUSE

From: Hampshire Water Project <HampshireWaterProject@planninginspectorate.gov.uk>
Sent: 25 July 2023 11:26
To: Navigation <navigation@trinityhouse.co.uk>
Cc: Hampshire Water Project <HampshireWaterProject@planninginspectorate.gov.uk>; Thomas Arculus <[redacted]@trinityhouse.co.uk>
Subject: WA010002 - Hampshire Water Transfer and Water Recycling Project - EIA Scoping Notification and Consultation

Dear Sir / Madam

Please see attached correspondence on the proposed Hampshire Water Transfer and Water Recycling project.

Please note that the deadline for consultation responses is **22 August 2023**, and is a statutory requirement that cannot be extended.

Kind regards
Laura

The Planning Inspectorate

Laura Feekins-Bate
Senior EIA Advisor
The Planning Inspectorate

@PINSgov The Planning Inspectorate planninginspectorate.gov.uk

Ensuring **fairness**, **openness** and **impartiality** across all our services

UK Health Security Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
London Road
Nottingham, NG2 4LA

nsipconsultations@ukhsa.gov.uk
www.gov.uk/ukhsa

Your Ref: WA010002-000010-230725
Our Ref: 64032

Laura Feekins-Bate
Senior EIA Advisor, The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

22nd August 2023

Dear Laura,

Nationally Significant Infrastructure Project
Hampshire Water Transfer and Water Recycling Project Ref: WA010002-000010-230725
Scoping Consultation Stage

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. ***Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID.*** The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the submitted scoping report we wish to make the following specific comments and recommendations:

Environmental Public Health

We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be covered elsewhere in the Environmental Statement. We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions, and residual impacts, relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*', setting out aspects to be addressed within the Environmental Statement[1]. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

Recommendation

Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold, i.e., an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

Odour emissions

The applicant has proposed to scope out further assessment of potential odour emissions to human receptors at the proposed site of the Water Recycling Plant (WRP) in section 6.6.6 – 6.6.8 and Table 6-9 of the Scoping Report (Volume 1) which is on a former landfill site. This landfill was identified in section 11.5.9 of the Scoping Report (Volume 1) as "Harts Farm Way" but little information is given regarding the sites former activities or waste types handled. Therefore, the potential for odour emissions during the construction phase of this project at this location is unknown.

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1 https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658

Recommendation
As little information is provided in the Scoping Report regarding potential waste types and their odour potential at the historic landfill site located at the proposed site of the WRP, it is recommended that potential odour emissions to human receptors during the construction phase of the project is scoped in for further assessment.

Electric and Magnetic Fields (EMF)
It is noted that the current proposals do not appear to consider possible health impacts of EMF.

Recommendation
We request that the ES clarifies this and if necessary, the proposer should confirm either that the proposed development does not impact any receptors from potential sources of EMF; or ensure that an adequate assessment of the possible impacts is undertaken and included in the ES.

Human Health and Wellbeing - OHID
This section of OHIDs response, identifies the wider determinants of health and wellbeing we expect the Environmental Statement (ES) to address, to demonstrate whether they are likely to give rise to significant effects. OHID has focused its approach on scoping determinants of health and wellbeing under four themes, which have been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements. The four themes are:

- Access
- Traffic and Transport
- Socioeconomic
- Land Use

Having considered the submitted Scoping Report OHID wish to make the following specific comments and recommendations.

Methodology - Determination of population and human health significant effects
The scoping report in Chapter 16 (16.7.12, Table 16-15 and table 16-16) proposes to use a single generic approach to the assessment of significance for health covering aspects of socioeconomics, tourism, recreation and health.
The most current and relevant guidance has been issued by the Institute of Environmental Management and Assessment (IEMA) should be used as the basis for the assessment of significance for population and human health.

Recommendations
The final ES must provide an assessment of significance of population and human health effects for those health determinants scoped into the Environmental Statement (ES) and

should draw upon other relevant topics, such as air quality, noise, socioeconomics, traffic and transport.
The proposed methodological approaches to assessment of significance for population and human health are not appropriate. Guidance on determining significance for human health in EIA (Pyper, R et al., 2022)[2], published by the Institute of Environmental Management and Assessment (IEMA) should be used as the basis for the assessment of significance.
The final ES should provide suitable justification for any assessment of significance.

Baseline data

The PEIR does not consider local health priorities which have been identified within local Joint Strategic Needs Assessments (JSNA) or Health and Wellbeing Strategies. Any existing data must be supplemented with current health data available from the JSNA but also from other sources.

Recommendation

A broader source of health data must be provided. This must include a review of local health priorities, such as the JSNA and Health and wellbeing strategy
In terms of additional sources, we would draw your attention to the following:

- OHID Fingertips
- Office for National Statistics - Wellbeing Indicators

Advice should also be sought from the local public health team on additional local data
The baseline data should include mental health and wellbeing data.

Mental health

The scoping report does not acknowledge the broad definition of health proposed by the World Health Organisation (WHO) which includes reference to mental health. Mental well-being is fundamental to achieving a healthy, resilient, and thriving population. It underpins healthy lifestyles, physical health, educational attainment, employment and productivity, relationships, community safety and cohesion and quality of life. A scheme of this scale and nature has impacts on the over-arching protective factors, which are:
• Enhancing control
• Increasing resilience and community assets
• Facilitating participation and promoting inclusion.

Recommendation

There should be parity between mental and physical health, and any assessment of health impact should include the appreciation of both. A systematic approach to the assessment of the effects on mental health, is required.

[2] [2] Pyper, R., Waples, H., Beard, C., Barratt, T., Hardy, K., Turton, P., Netherton, A., McDonald, J., Buroni, A., Bhatt, A., Phelan, E., Scott, I., Fisher, T., Christian, G., Ekermawi, R., Devine, K., McClenaghan, R., Fenech, B., Dunne, A., Hodgson, G., Purdy, J., Cave, B. (2022) IEMA Guide: Determining Significance for Human Health in Environmental Impact Assessment.

In addition to the baseline indicators the assessment would benefit from including social cohesion/connectedness, satisfaction with local area and quality of life indicators owing to their established links to mental health and wellbeing.
In terms of sources, we would draw your attention to the following:

- PHE Fingertips – Mental Health and Wellbeing JSNA
    - Area profiles with various indicators on common mental disorders (including anxiety) and severe mental illness which can be benchmarked with other local areas as well as regional and national data
- Office for National Statistics - Wellbeing Indicators
    - Range of datasets related to wellbeing available including young people's wellbeing measures, personal wellbeing estimates and loneliness rates by local authority

When estimating community anxiety and stress in particular, a qualitative assessment may be most appropriate. This may involve conducting resident surveys but also information received through public consultations, including community engagement exercises. We would also encourage you to consult with the local authority's public health team who are likely to have Health Intelligence specialists who will have knowledge about the availability of local data. Robust and meaningful consultation with the local community will be an important mitigation measure, in addition to informing the assessment and subsequent mitigation measures.

Report format and presentation

We welcome the reporting of assessment details broken down into appropriate sections given the linear nature of the scheme. The structure of Chapter 16 (Socioeconomics, tourism, recreation and health) reports using the EIA process, e.g., baseline, sensitivity of receptors/communities and potential impacts and effects, rather than each scheme section in turn. This prevents a clear understanding of the findings of the assessment for the reader. This is compounded by the chapter covering multiple topics.

Recommendation

The Chapter should be structured such that a reader can consider route wide and then each of the individual scheme sections separately. This avoids the need for repetition and enables the assessment methodology to be followed for each scheme section in turn. This does not require any additional information but just a reformatting of the presented information and assessment for the PEIR.

Physical activity and active travel / access to open space

The report identifies significant potential impact through the temporary loss or change in formal Public Rights of Way (PRoW), the existing road network and national cycle networks. Physical activity forms an important part in helping to promote healthy weight environments and as such it is important that any changes have a positive long-term impact where

possible. We welcome the scoping reports intention to consider enhancements within the scheme design and mitigation options.
The report indicates that the frequency of use for these routes will be determined by surveys and strava heat maps. The determination of sensitivity and magnitude must include reference to the usage of each PRoW, bridleway, or cycle route. In addition to public authority consultation usage insights can also be gained through community consultation.

Recommendations
Local consultation with the community and an assessment of the routes directly affect should indicate likely usage levels. This data should be used to review the allocation of sensitivity, magnitude and final assessment of significance to each of the affected PRoW or cycle networks. These consultations can also assist in the identification of potential enhancement measures.
The ES should include details of the PRoW management plan that identifies specific mitigation and enhancements proposed during the construction and operational phase of the scheme.

Traffic and Transport
The Traffic and Transport Study will be based on the IEMA Guidelines. The latest version of the IEMA guidelines should be used to form the basis of the assessment.

Recommendations
The traffic and transport assessment should be completed in accordance with the latest IEMA Guidance - Environmental Assessment of Road Traffic and Movement[3].
Any sensitive location identified under Rule 2 of the IEMA guidelines should be identified and reported within the ES

Yours sincerely,

On behalf of UK Health Security Agency

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

[3] David, S, Hoare. D, Howard. R, Ross. A. (2023) Institute of Environmental Management and Assessment of Road Traffic and Movement

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Marie Shoesmith
Senior EIA Advisor
on behalf of the Secretary of State
(By email)

Claire Upton-Brown
Executive Head of Planning Development

When calling please ask for: Michael Eastham
Direct line: [redacted]
Switchboard number: [redacted]
Email: [redacted]@waverley.gov.uk

22 August 2023

Dear Ms Shoesmith,

TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) ORDER 2015 SCHEDULE 2; PART 11

WA/2023/01747 (WBC REFERENCE) – CONSULTATION ON A NATIONALLY SIGNIFICANT INFRASTRUCTURE PROJECT. APPLICATION BY SOUTHERN WATER SERVICES LIMITED (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE HAMPSHIRE WATER TRANSFER AND WATER RECYCLING PROJECT.
Site Address: HAMPSHIRE WATER TRANSFER PROJECT, HARTS FARM WAY.

I refer to your letter dated 25th July 2023, in respect of Southern Water Services Limited's request to the Planning Inspectorate on behalf of the Secretary of State for its opinion (a Scoping Opinion) as to the information to be provided in an Environmental Statement (ES) relating to the Hampshire Water Transfer & Water Recycling Project.

It is understood that the Hampshire Water Transfer & Water Recycling Project comprises both water transfer and water recycling technology, with a proposed water recycling plant and associated pipeline transferring recycled water to the planned Havant Thicket Reservoir (a separate scheme for which Portsmouth Water obtained planning consent in October 2021 from Havant Borough Council (APP/20/00990) and East Hampshire District Council (51680/001). The Hampshire Water Transfer & Water Recycling Project also comprises a transfer pipeline between Havant Thicket Reservoir and Southern Water's Otterbourne Water Supply Works serving its western supply area in Hampshire, incorporating above ground plant. The proposed development is a drought resilience scheme, which could provide up to 90Ml/d into Hampshire's supply network during a drought; it would only be fully utilised in a drought, with the rest of the time being operational at a minimal flow to maintain water flows; and the operation of the proposed development would be increased during drought conditions to draw more water out of Havant Thicket Reservoir, and supplement levels within the reservoir.

Having considered the information submitted in the Southern Water Services Limited's EIA Scoping Report, I hereby confirm that Waverley Borough Council (as a Local Planning Authority) does not have any comments to make.

Yours sincerely,

Chris French
Development Lead – Strategic Sites

Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Contact: Robert Green
Email: [redacted]@winchester.gov.uk

22 August 2023

Dear Sir/Madam,

CONSULTATION UNDER THE PLANNING ACT 2008 (AS AMENDED) AND THE INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 – REGULATIONS 10 AND 11

Applicant: Southern Water

Proposal: Hampshire Water Transfer and Water Recycling Project

Thank you for your consultation to Winchester City Council (WCC) regarding the above EIA Scoping Opinion, which was received on 25 July 2023.

The Planning Inspectorate have identified Winchester City Council Local Planning Authority as a consultation body which must be consulted before adopting its Scoping Opinion. You have asked us to:

- Inform the Planning Inspectorate of the information we consider should be provided in the Environment Statement; or
- Confirm we do not have any comments.

The City Council's specialist officers have been consulted and I provide comments based on relevant sections of the applicant's scoping report below. The comments provided relate to the areas of the site within the jurisdiction of Winchester City Council.

Please note, the Council has complied with the request to provide a scoping opinion consultation response on a without prejudice basis and in so doing does not necessarily accept or imply that the development accords with the policies of the Development Plan.

1. General Remarks

1.1 The applicant has identified the correct current Development Plan documents in paragraph 2.5.2.
Reference is made to the Winchester District Local Plan Review (2006) in the Applicant's Scoping Report. This Plan is no longer use and was replaced in 2017 by the adoption of the Local Plan Part 2.

The Local Plan Part 1 – Joint Core Strategy (LPP1) and Local Plan Part 2 – Development Management and Site Allocations (LPP2) form the adopted Development Plan of the District.

1.2 WCC is currently updating the Development Plan, the future Local Plan has not been mentioned in paragraph 2.5.2.

Once adopted, the emerging plan will replace LPP1 and LPP2 to form the overarching Development Plan for the district.
The Plan remains in early stages of production and the Regulation 18 consultation ended on 14 December 2022.
Consultations are currently being reviewed and any proposed changes that result from the consultation will be subject to a sustainability appraisal and Local Plan Viability Assessment before being consulted on again at the Regulation 19 consultation.

1.3 A number of Local Policies have been missed in sections throughout the report and these have been highlighted.

1.4 WCC declared a Climate Emergency in June 2019 and *Climate* will form a vital part of the Environmental Statement and on-going assessment of the scheme. Whilst Climate correctly has its own topic section in the Environmental section, this is a topic which is interrelated with all other parts of the ES. It is therefore important that the applicant provides an assessment of how Climate and the Climate Emergency declaration have been considered and responded to across topics of the ES.

2. Air Quality and Odour

2.1 LPP2 Policy DM19 (Development and Pollution) has not been included in Table 6.1.

2.2 No further comments on table 6.9.

3. Archaeology and Cultural Heritage

3.1 LPP2 Policy DM26 (Archaeology) has not been included in table 7.1.

3.2 No further comments on table 7.8 however please see Appendix A for detailed response from the City Archaeologist.

4. Terrestrial and Freshwater Biodiversity

4.1 The proposed approach and information considered within the scoping report is considered appropriate.

4.2 It is noted that baseline habitat and species surveys are on-going and will be reported on in the Environmental Statement. Further justification is needed regarding the following potential effects:

- Potential temporary direct damage or changes to habitats within statutory designated sites during construction is not an effect included within table 8-6. There will be crossing points on the River Itchen SAC & SSSI. Has this potential effect been scoped out because the use of trenchless methods will avoid all potential damage? Will site compounds, pumping stations and break pressure tank locations completely avoid statutory designated sites?
- Reptiles and notable plants should be scoping in/included in table 8-12 as baseline surveys are on-going.

4.3 It is noted that Great crested newt have been scoped out because any potential adverse construction effects will be mitigated by the use of a District Level Licence.

4.4 WCC supports the applicant's decision to incorporate a 10% Biodiversity Net Gain, which will be included within a technical appendix.

4.5 No further comments on table 8.12.

5. Marine Biodiversity

5.1 No comments on this section.

6. Carbon and Climate Change

6.1 LPP1 Policy DS1 is not included in Table 10.2 and asks for all development to address Climate Change.

6.2 No further comments on table 10.12.

7. Land Quality and Ground Conditions

7.1 LPP2 Policy DM21 (Contaminated Land) is not included in Table 11.1.

7.2 No further comments on table 11.15.

8. Land Use and Agriculture

8.1 No further comments on table 12.8.

9. Landscape and Visual Impact

9.1 LPP2 Policy DM23 (Rural Character) has not been included in table 13.9.

9.2 No further comments on table 13.13.

10. Noise and Vibration

10.1 LPP2 Policies DM17 (Site Development Principles), DM19 (Development and Pollution) and DM20 (Development and Noise) have not been included in Table 14.1.

10.2 The Applicant has referred to saved policies of the Winchester District Local Plan Review 2006. This Local Plan is no longer used and was replaced by LPP1 and LPP2 in 2017.

10.3 It is noted that the Noise and Vibration Chapter omits the WCC Technical Guidance Document on this matter. It is recommended that this is reviewed and the guidance taken into account.

10.4 Section 14.6.43 states that the operational phase of the development will be working to achieve a rating level of back ground +5dB. The development should be

designed so as to achieve a rating level of 10dB (LAeq) below the typical background (LA90) level at the nearest noise sensitive location or at the very minimum NOAE.
Where this criterion cannot be achieved, the various noise control measures considered as part of the assessment should be fully explained (i.e. relocation of noise sources, use of quieter equipment, enclosures, screening, restriction of the hours of operation etc.) and the achievable noise level should be identified.

10.5 No further comments on table 14.14.

11. Resource and Waste Management

11.1 LPP2 Policy DM19 (Development and Pollution) is not included in table 15.1.

11.2 It is noted that *GHG Emissions* are scoped in for construction in the Climate section which is expected to take account of resource use and travel to the construction site.

11.3 No further comments on table 15.15.

12. Socio-economics, Tourism, Recreation and Health

12.1 No further comments on table 16.18.

12.2 It is noted that *Access to Work and Training* is scoped in and this is supported. The council follows the Construction Industry Training Board (CITB) client based approach for all large scale planning applications. An Employment and Skills Plan which sets out how local firms and employees will benefit from the development is expected.

13. Traffic and Transport

13.1 WCC defer to Hampshire County Council as Highway Authority.

14. Water Environment

14.1 No further comments on table 18.9.

14.2 It should be noted that development is proposed within an area where a known impact on nationally protected sites (‘The Solent SPAs’) is caused by the introduction of nutrients into water systems. In particular, the impact of Phosphorous entering the River Itchen is a key concern, and proposed development will take place within the catchment of the Itchen.
Statements should therefore assess the impact of development on nutrients entering watercourses, particularly as the pipeline is to be constructed in agricultural areas.

15. Cumulative Effects Assessment

15.1 No further comments on table 19.5.

16. Topics Scoped Out

16.1 No further comments on table 20.3

Appendix A – City Archaeologist Response

Historic Environment - Archaeology
Planning Consultation Comments

RE: 23/01885/SCOPE - Southern Water Havant To Otterbourne Pipeline Curdridge Lane, Curdridge, Hampshire

Key issues:

1. The preservation, conservation, investigation and recording of archaeological interest (Policy DM26 Winchester District Local Plan Part 2; Policy CP20 Winchester District Joint Core Strategy; NPPF Section 16).

Consultation response:

I have reviewed the Hampshire Water Transfer and Water Recycling Project Scoping Report (Volume I Main Report - document ref. 208102-ARU-EGN-XX-RP-L-00001 July 2023 Issue Rev 01 & associated figures in Volume III Figures Part 1 of 5 document ref. document ref.208102-ARU-EGN-XX-DR-L-00001 July 2023 Issue Rev 01).
Chapter 7 of the Scoping Report considers Archaeology and Cultural Heritage; Table 7-8 identifies relevant matters that are to be scoped into the EIA and these are agreed.
Section 3 of the Scoping report provides a description of the proposed pipeline scheme and related infrastructure during its construction, operation and de-commissioning phases. It is noted that some scheme elements (the construction hub, locations for the break pressure tanks and intermediate pumping stations and temporary water storage lagoons as well as underground chambers (for isolation values, washouts and air valves etc.) have not yet been identified, although the frequency and dimensions of these (bar the construction hub) are detailed.

Para. 3.1.6 confirms that the Scoping Area is larger than will be required for the DCO application to allow for flexibility in routing / design through the EIA process. In terms of Archaeology ongoing archaeological survey and evaluation work should inform this design process and the mitigation hierarchy. If the Construction Hub is located outside of the Scoping Area para. 5.2.13 confirms that this area will be subject to further assessment as part of the EIA.

Section 5.2 of the Scoping Report sets out general approaches to the EIA assessment and this is agreed.

Section 7.1 Introduction includes identification of other receptors which may have relevance to the consideration of Archaeology and other Cultural Heritage (such as the water environment & hydrology and landscape re Historic Hedgerows etc.). Cross consideration of these matters is appropriate and welcomed. However, para. 7.1.4 of the Scoping Report indicates that effects on some historic landscape features, landscape character and valued views, including views from heritage assets are to be considered within the Landscape Chapter (Chapter 13). Relevant effects on historic landscape features and valued views from heritage asset should also be considered within the Archaeology and Cultural Heritage chapter.

Section 7.2 sets out the Legislation, Policy and Guidance which will inform the EIA process and Chapter 7 of the resulting ES. The only comment I have regarding this is that relevant policies contained with Part 2 of the Winchester District Local Plan should be included in Table 7-1. Whether policies contained in the emerging Local Plan (currently at Regulation 18 stage) should also be referenced in the ES is a matter I defer to Planning on.
Section 7.3 (and Table 7-2) of the Scoping Report outlines previous engagement relating to Archaeological and wider Cultural Heritage matters and this is noted.

Section 7.4 sets out the approach to Scoping for Archaeology and Cultural Heritage and describes the study area for designated and undesignated heritage assets; this has been previously agreed as suitable. Para. 7.4.4 confirms that the effects of the as yet unidentified site of the Construction Hub will be assessed and reported in the ES.

Sources of baseline data are outlined and summarised in Table 7-3 and these are appropriate. Previously obtained baseline Historic Environment Record data will be updated (para. 7.4.6) and this is in progress. However as advised during previous stake holder engagement, data on Palaeolithic and Mesolithic finds (especially on Portsdown Hill) has yet to be systematically collated and included in the Winchester HER. It has been recommended that data from the Jacobi and Wymer collections (the latter from the *English Rivers Project*) should be reviewed for relevant data for the baseline study.

Section 7.5 of the report outlines baseline conditions for the proposal area (known designated and undesignated heritage assets) and subject to previous comments regarding acquisition of more detailed information on the Palaeolithic / Mesolithic resource and updated HER data this is considered appropriate.
As previously outlined to the scheme's consultants not only are the designated sites of the Palmerston Forts on Portsdown Hill of national significance the open fields of fire around these form part of their significance; this is recognised in the Scoping Report (para. 7.5.21). Any overground elements relating to the scheme within these areas (particularly given the identified scale of elements of above ground

infrastructure associated with this proposal such as the Break Pressure Tanks and Intermediate Pumping Stations) may have major effects on the significance of these designated heritage assets and their related landscape significance. See further comments on Setting below.
Para. 7.5.27 also recognises the high Palaeolithic potential at Portsdown Hill and for Roman remains at Wickham (para. 7.5.28) and for Roman routes within the Scoping Area.

Information from current and forthcoming archaeological surveys and investigations should continue to be incorporated into the ES baseline and inform the EIA and forthcoming mitigation proposals.
The identification of a moderate to high potential for unknown buried archaeological remains from the Palaeolithic through to the modern period within the Scoping Area is concurred with (para. 7.5.32).
Section 7.6 - Scoping of potential effects. Potential effects, direct and indirect, permanent and temporary are set out for the construction, operation and decommissioning stages of this scheme. These are considered to be reasonably comprehensive at this stage and I am pleased to note that interactions with other receptors, including potential indirect impacts from changes to hydrological regimes and vibration etc. on heritage assets are to be considered.
In addition to further baseline data collection para. 7.7.3 outlines previous and ongoing and future surveys (subject to stakeholder discussion and agreement) which will inform the ES baseline and help understanding of potential scheme effects. These comprise / are to comprise site visits, geophysical survey in priority areas, desk-based assessments, archaeological monitoring of GI work and targeted field walking and metal detector survey.
Para. 7.7.4 outlines potential further archaeological survey work and trial trenching (particularly in areas of high archaeological potential and / or a key areas of proposed scheme infrastructure / impact zones and other potential project pinch points), also to be the subject of stake holder discussion. Regarding this a number of areas of high archaeological potential and key impact zones are already recognised, and it is important that the potential scheme effects are fully understood through the EIA process and appropriate mitigation measures (including through design / avoidance) are included in the final design and ES. See further comments below relating to Section 7.9 of the Scoping Report.

The assessment methodologies and definitions set out in para's. 7.7.5 through 7.7.24 and Tables 7-4 through 7-4 of the Scoping Report are appropriate and follow accepted sector methodologies.

Consideration of potential cumulative and in-combination effects is also considered appropriate (para's. 7.725 through 7.7.28).

Section 7.8 Limitations and assumptions – no comments other than ongoing consultation is welcomed.

Section 7.9 Approaches to mitigation and residual effects
Reference to embedding within the ongoing design process mitigation measures through avoidance, micro-siting and route refinement are welcomed (paras. 7.9.1, 7.9.3 & 7.9.4). However, this will require completion of further archaeological survey and evaluation work to obtain relevant data to inform the EIA and scheme refinement work.

Para. 7.9.2 suggests that further archaeological survey and evaluation may be undertaken at a post consent stage, with an Outline Mitigation Strategy to be submitted with the (draft) DCO. If so, there may be insufficient archaeological data to inform mitigation through design as per the mitigation hierarchy (where appropriate), particularly in areas of high archaeological potential and for early-stage consideration of mitigation issues in key infrastructure pinch points. However, the wording “any outstanding survey and evaluation work” in the same paragraph does suggest that further archaeological work will be undertaken as part of the EIA process; clarity on this would be welcomed.

Further to this, previous discussions with the scheme consultants have suggested that additional archaeological survey and evaluation work may occur in August / September 2023 and spring 2024 (geophysical survey) with evaluation trenching potentially in 2024. The PINS website suggests that an application for this scheme is expected in the 2nd quarter of 2025, which would seem to allow sufficient time for the completion of further archaeological investigations, consideration of their results within the EIA process and to inform the development of an appropriate mitigation strategy for inclusion in an ES.

Paras. 7.9.3 through 7.9.7 provide a summary of likely mitigation measures which may be adopted for the proposed scheme. The general nature of these is considered acceptable however the precise identification of what mitigation approach for which part of the final scheme area may be required cannot yet be determined.

With reference to para. 7.9.8, likely agreement on detailed / site-specific (mitigation) measures post consent is general concurred with. However as has been previously discussed with the scheme consultants, sufficient time should be built into the post-consent programme to allow for agreement of mitigation measures and their undertaking to avoid delays and conflicts with a construction schedule and to take account of any local authority capacity issues. Further archaeological survey and evaluation at an early stage (during the EIA process) would help to minimise risks and delays at the post consent stage.

Setting

It is important that the location and design of above ground infrastructure within the setting of designated heritage assets and significant undesignated heritage assets are carefully considered throughout the EIA / design refinement process, so that effects on their significance are minimised / avoided. Key scheme elements should be subject to ongoing detailed consultation and agreement with Historic England and Winchester City Council (para. 7.9.5).

In previous discussions with the scheme consultants, it has been indicated that for a formal setting assessment a list of receptors will be drawn up once the route and location of permanent above ground structures has been finalised and shared for comment. However, it is important that setting issues (for example on Portsdown Hill) inform the scheme design and are included at an early stage in an iterative process. Heritage Viewpoints and a ZTV should be agree at an early stage to allow for both summer and winter photography.

Summary of key issues

- Updated baseline data for assessment should include acquisition of updated HER data (in progress) as well as information on information on Palaeolithic and Mesolithic finds from the study area from the Jacobi and Wymer (*English Rivers Project*) collections.

- Ongoing archaeological survey and evaluation work should inform the EIA process, design refinement and an outline mitigation strategy as per the mitigation hierarchy to be utilised.

- Relevant effects on historic landscape features and valued views from heritage asset should be considered within the ES Archaeology and Cultural Heritage chapter.

- Setting issues should form part of an iterative design refinement process with key scheme infrastructure subject to ongoing detailed consultation and agreement with Historic England and Winchester City Council.
    - Key receptors should be identified at an early stage.
    - Heritage Viewpoints and a ZTV should be agreed at an early stage to allow for summer and winter photography.

- Further engagement and discussion should be undertaken in relating to Archaeology and Cultural Heritage throughout the EIA process.