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Dear Sir / Madam

Town and Country Planning (Environmental Impact Assessment) Regulations 2017

Request for an EIA Screening Opinion for Chickenhall Wastewater Treatment Works upgrade

I am writing on behalf of Southern Water Services Ltd. (SWS) to formally request a screening opinion under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations) regarding proposals to upgrade Chickenhall Wastewater Treatment Works (WTW).

Chickenhall WTW is an existing operational wastewater treatment site located at Grid Reference SU 4681 1788. The WTW is located on the eastern edge of Eastleigh within the administrative boundaries of Eastleigh Borough Council and Hampshire Sussex County Council. The WTW is accessed directly from Chickenhall Lane as detailed in Appendix A.

This letter and enclosed supporting documentation have been prepared to support the request for an EIA Screening Opinion and provide the information identified in the EIA Regulations. It presents the findings of a study undertaken to assess the potential environmental effects of the proposed scheme. It describes the environmental context; predicts the potential effects on the environment and outlines the management and mitigation measures that will be implemented to avoid significant effects.

The proposed development is considered to fall under "Schedule 2 development" of the EIA Regulations 2017:

- A description of development referenced in Column 1 of the table in Schedule 2; [parts] 11 (c) 'Waste-water treatment plants' and 13 (b) any change to or extension of development;

The indicative criteria for wastewater treatment plants (under Schedule 2, Part 11(c) of the EIA Regulations 2017), as set out in the Annex to the Planning Policy Guidance on Environmental Impact Assessment (EIA) states that EIA is more likely where the site area exceeds 10 hectares, or the capacity exceeds 100,000 population equivalent. The development does not meet the



indicative criteria and threshold values for determining significant effects, i.e. where a site area is more than 10 hectares though the current and proposed capacity exceeds 100,000 population equivalent. The WTW currently serves a population equivalent of 105,311 with the works being required to serve the local population growth estimated to be 127,184 by 2035. Given that Chickehall WTW already serves a large population in excess of 100,000 and the proposed development is required to meet a growth of 21,873 it is assessed that it is more appropriate to use this growth number rather the total population equivalent number when considering the likelihood of significant effect given the existing land use and operation size of the WTW which will not change as a result of the proposed development.

The EIA Regulations 2017 require that such proposals be assessed against three broad criteria, namely:

- The characteristics of the proposed development (e.g. its size, treatment process, use of natural resources, quantities of pollution and waste generated);
- The sensitivity of the receiving environment; and
- The characteristics and significance of the potential effects (magnitude and duration) (e.g. pollution and nuisance potential, topography, proximity of dwellings and the potential impact of traffic movements).

The design process has included consideration of proposals by SWS Environmental Advisors and Ecologists. This has enabled potential impacts to be avoided by design where possible and minimised and mitigated elsewhere.

SWS assessment of the proposed development and its potential environmental effects is that it is not likely to have significant adverse impacts on the environment and therefore we would not expect the development to be classed as an EIA development.

The proposed new infrastructure is located entirely within the existing operational site. Assuming the development is assessed as 'not EIA development', the new infrastructure would largely be installed with the benefit of Southern Water's Permitted Development (PD) Rights for operational land - under the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (GPDO 2015), Part 13, Class B (f).

As the temporary site compound would be established on land within the works this would benefit from PD rights under Schedule 2 Part 4 Class A of the GPDO 2015 for "the provision on land of buildings, moveable structures, works, plant or machinery required temporarily in connection with and for the duration of operations being or to be carried out on, in, under or over that land or on land adjoining that land".

The proposed works on the WTW will be developed to meet the requirements of the revised Environment Agency Environmental Permit.

Scheme Drivers

SWS has a duty under Part IV of the Water Industry Act 1991 to ensure that an efficient and economical system of water collection and treatment is provided to our customers. The upgrade is required so that the design, supply and commissioning of new assets/works, as required, along with the integration of such assets/works meet a number of environmental drivers relating to the discharge of final effluent into the environment. The specific drivers are;

- U_IMP6 driver, to increase storm tank capacity.

Development Proposal

Chickenhall WTW requires a number of additional process units to ensure that it treats the community's sewage in accordance with revised EA Environmental Permit. To accommodate the capacity issues the proposed scope includes; storm tank, Motor Control Centre Kiosk, a storm split chamber and two manholes.

The proposed new key items of plant are detailed below in Table 1. Additional details of the required supporting works are provided below.

Table 1: Proposed development - key plant and infrastructure
(also refer to Appendix B drawing 790084-MWX-ZZ-00-DR-C-000- Chickenhall WTW – Proposed Site Layout)

Description	Dimensions (l x w x h) in metres	Capacity (m ³)	Finish / Material	Planning / PD *
Storm Tank	23m diameter (2m bgl).	NA	Concrete	PD
MCC Kiosk	4.2 x 2.2 x 2.8	23m ³	GRP Kiosk (Holly green)	PD
Storm Split Chamber	3.6m diameter (2m bgl).	NA	Concrete	PD

In the table above: subject to EIA screening, HRA, Planning / PD refers to specific planning permission or Permitted Development (as outlined above).

The proposed structures will be connected to existing plant and equipment via new buried connections and ducts. Suitable site drainage will also be installed. All runoff from hard surfaces will be drained to the works return pumping station and from there back into the wastewater treatment process.

Temporary Working Areas / Compound

The temporary compound will be located in an area of hardstanding and amenity grassland within the WTW. The site compound would be used for car parking, material laydown and three double stacked (steel) containers with two additional stores.(see Appendix B).

In areas of grassland the top soil will be stripped, a membrane installed and finished with compacted type 1 aggregate. At the end of the construction period, all areas temporarily affected by the proposed works will be reinstated as close as practicable to the pre-existing site condition and to suit the ongoing operational needs of the WTW.

Construction Programme

Construction works are programmed to commence in November 2023 and are scheduled to take approximately 56 weeks for site set up, construction & commissioning (including any repair and



reinstatement works), though 30-35 weeks of this programme will be for mechanical and electrical installation, minor civils and commissioning activities.

Construction work will generally be undertaken between 07:00 and 18:00 Mondays to Fridays and between 07:30 to 13:00 on Saturdays. There is no intention for work to be undertaken on Sundays or any Bank Holidays.

Traffic Management and Access

During the construction period, the proposed development and compound will be accessed directly from the existing WTW access road.

The peak mobilisation period is anticipated to run for approximately for one week during site set up and will require 20 vehicles movements, including 10 HGV movements per day. Following site set up the ground and civils works will run for approximately 20-25 weeks and will also require 20 vehicles movements, including 5 HGV movements per day. Throughout the site set, up, ground works and civils period there will be 15 cars/LGV per day.

Once peak mobilization and ground and civil works have completed, and for a period of 30 weeks, a total of 15 vehicle movements per day will be need, which will include 1 to 2 HGVs per day with the remainder being cars/LGV.

At the end of the construction period during demobilisation there will be a slight upturn in vehicle movements to enable the removal of site cabins and reinstatement works, though these will not exceed the peak mobilization numbers and will run for approximately a one week period.

A Construction Traffic Management Plan will be prepared that details access routes to the WTW with consideration of areas susceptible to congestion and timings of deliveries managed to avoid busy times and reduce impact on the local road network and local residences during construction as well as measures to control dust/mud.

Operation and maintenance of the scheme will be included into the daily, monthly and annual operation and maintenance routine of the site operations team. Therefore, it has been assessed there will not be a significant increase in operational traffic following the completion of the works.

Site Lighting

Chickenhall WTW is a large manned site and currently has lighting columns and also task specific lighting associated with various items of infrastructure. The proposed upgrade will require some additional task lighting though this will be limited to the MCC kiosk and will only be operated when the kiosk is open and being serviced and/or maintained.

As is the case currently all task specific lighting will be manually switched on/off, with lights only being on when operators are on site and low light conditions occur. To mitigate any impact on protected species and the surrounding environment, lighting will be orientated away from site boundaries, to minimise light trespass and maximise the light on the tasks.

Construction work will take place during day light hours Monday to Friday with some working potentially taking place on Saturday. Temporary lighting will only be required when light levels are below what is required to safely carry out the task. Lighting will be manually switched on/off and will only be on as required to safely access site and for any specific task. The location of lighting will depend on the task to be undertaken and will be set up for individual activities as required. Site



staff will aim to undertake all activities that would require task lighting during daylight hours to avoid impact. However, if it is absolutely necessary to undertake activities requiring task lighting outside of daylight hours the lighting used will be directional and shielded LED lighting.

Demolition / Decommissioning

It is not anticipated any existing assets or structures will be demolished as part of the proposed development.

Site Reinstatement

As the permanent and temporary development is entirely within the boundaries of an existing operational WTW, it is anticipated that there will be minimal effects on the surrounding environment. Reinstatement of the on-site working area will be to a standard that suits the ongoing operational function of the WTW.

Potential Impacts on the Environment

The potential environmental impacts of the proposed development have been considered and reviewed throughout the project development by an Environmental Advisor and Ecologist working with the Engineering Design Team to ensure any potential negative impacts are addressed and, as far as possible, designed out.

Ecology

A suitably experienced ecologist has carried out a Preliminary Ecological Appraisal (PEA) for the WTW. This consisted of a Phase 1 Habitat Survey in June 2021 and a desktop assessment (in December 2022). The site was also visited in February 2023 to undertake a Potential Roost Assessment for bats and an Otter survey, and at that time any changes to the habitats on site were noted and converted to UKHabs. An Ecological Impact Assessment (EclA) for the WTW development is presented below.

Designated Sites

Statutory Designated Sites

There is one statutory designated site within 2km of the WTW:

- River Itchen SAC (c.30m north-east) Qualifying habitats: Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation. Qualifying species: Atlantic salmon, brook lamprey, bullhead, otter, southern damselfly, white-clawed crayfish.

Non-Statutory Designated Nature Conservation Areas

There are four three Local Wildlife Sites (LWS) (Hampshire) within 500m of the wider WTW

- Stanford Meadow LWS which is 20m east at its nearest point;
- Marshy Grassland, Bishopstoke which is 70m north east at its nearest point;
- Meadow North of Railway which is 220m south east at its nearest point; and
- Ashtrim Nurseries are 370m north at its nearest point

Due to their location and nature, the proposed works are not expected to impact any Local Wildlife sites. While Stamford Meadow effectively borders the WTW, direct impacts are not anticipated as the proposed works are expected to be contained within the existing WTW site boundary and adjacent to the western fence line. Furthermore, the site was not selected for Local Wildlife Site status based on criteria that are sensitive to noise or visual disturbance.

Habitats

The habitats within the existing operational site boundary have been categorised using the UKHabs survey methodology (UKHab, 2020¹). Habitats were assigned a minimum Level 4 Primary Habitat type from the UKHab hierarchy and mapped using the fine scale Minimum Mapping Unit (25m², 5m length). The only habitat to be directly affected by the proposed works is modified grassland and other native hedgerow. All habitats within the WTW boundary are listed below.

Habitat name	UKHab code
Modified grassland – (Frequently mown)	g4 (Secondary Code 108)
Buildings	u1b5
Urban – other developed land (WTW infrastructure)	u1b6
Mixed scrub	h3
Other Native Hedgerow	h2a6
Lowland mixed deciduous woodland	w1f
Other Coniferous Woodland	Secondary code 33

The scheme will involve a temporary construction compound located on amenity grassland (modified grassland) and hardstanding (other developed land). A short section of isolated poor species rich hedgerow will also require temporary removal to enable construction to take place. Both areas will be returned to other modified grassland or a more biodiverse habitat following completion of the works and so there will be no loss of biodiversity and there will not be a significant impact from the scheme on the existing habitats.

Protected Species

Breeding Birds

Site mobilisation is planned for November 2023 which is not breeding bird season as such the scheme is highly unlikely to impact breeding birds, as the majority of habitat to be impacted is short maintained modified grassland with a short section of hedgerow also being temporarily removed within the operational boundary of the WTW. No significant impact on the breeding birds is anticipated.

¹ Butcher, B., Carey, P., Edmonds, R., Norton, L. and Treweek, J. (2020) *The UK Habitat Classification Manual Version 1.1* at <https://ukhab.org/>

Bats

A preliminary ground level bat roost assessment was undertaken in February 2023. This identified one building on site with moderate bat roost potential. At the time of survey there was a risk that work would be required to the building or in close proximity. However since the time of the survey further design has confirmed there will be no direct or indirect disturbance to the building.

Hazel Dormouse

Whilst habitat adjacent to the scheme within the WTW and adjacent land may provide habitat for dormouse, the only habitat to be affected is short maintained modified grassland and a short section of isolated hedgerow within the WTW. The risk of dormice being present is considered negligible due to the small size of the hedge and a lack of connectivity to suitable habitat. The supervision of the clearance by an ecologist will be sufficient to mitigate any residual risk for that species.

Therefore, no potential effects on hazel dormouse are anticipated.

Great Crested Newt (GCN)

The proposed works will primarily impact areas of hardstanding and frequently mown modified grassland which have negligible potential to support great crested newt. A small section of isolated species-poor hedgerow will also be impacted. This habitat is potentially suitable for great crested newt, although the closest waterbody that could potentially support the species in its breeding phase is c.200m away and connected via sub-optimum habitat. As a result, the likelihood of great crested newt being present in the hedgerow is low. To account for the residual risk of encountering great crested newt, works impacting the hedgerow will take place in accordance with a precautionary method statement for the species.

Therefore, no potential effects on GCN are anticipated.

Badger

No badger setts nor any sign of badger were recorded during the initial field survey though an Otter survey undertaken in Feb 2023 identified the presence of an active main badger sett within the on-site scrub in the eastern extent of the WTW, approximately 200m from the proposed development, it is highly unlikely that they will build a sett on the short maintained modified grassland within the WTW. However, any excavations will be covered overnight, or a mammal ramp installed to prevent badger (or other mammals) getting trapped.

A pre-construction check will be conducted by a suitably experienced ecologist to determine if any new setts have been established within 30m of the proposed working area. This will be conducted four to six weeks prior to works commencing, thereby giving time for registration with Natural England under Southern Water's Organisational Licence should disturbance/closure of a sett be required. The check will then be repeated immediately before works begin.

With the adoption of the mitigation measures above, the proposed works will not have a significant impact on badger.

Reptiles

The proposed works will primarily impact areas of hardstanding and frequently mown modified grassland which have negligible potential to reptiles. A small section of isolated species-poor hedgerow will also be impacted. Any works impacting the hedgerow will take place in accordance with a precautionary method statement for the species.

Therefore, no potential effects on reptiles are anticipated.

Invertebrates

The scheme will only affect short, maintained modified grassland and small section of isolated hedgerow which not likely to contain a large diversity of invertebrates. In addition, as the scheme is small scale and it is highly unlikely that an important invertebrate assemblage would be permanently negatively impacted.

Water Vole, Otter and White-clawed Crayfish

No works are to occur within 10m of the watercourse which runs along the eastern boundary of the site. However the River Itchen is approximately 50m east of the site boundary at the closest extent with dense continuous scrub, swamp and broadleaved woodland could potentially support otter resting places.

An Otter survey was undertaken in Feb 2023 however, no evidence of the species was found within the site. The WTW does contain an area of dense scrub that is potentially suitable to support an otter resting place though this is not in proximity to the proposed development. However, there are significant areas of suitable habitat outside of the WTW, in closer proximity to the river, which could also potentially support resting places. As a result, it is considered unlikely that otters would travel into the WTW to rest. The presence of an active main badger sett within the on-site scrub may also reduce its suitability. Interactions between the species are poorly documented, but it is possible that otters would seek to avoid such close proximity to a similarly sized carnivore.

Otters are considered vulnerable to disturbance at up to 30m from a resting place and 200m from a natal/breeding holt.² The current design indicates the proposed works will be at least 200m away from any habitat likely to support a resting place or holt. It is unlikely that a natal/breeding holt would be located within 200m of the WTW, as evidence suggests these are typically located away from major rivers.³

Taking all the factors above into consideration, the risk of the proposed works at Chickenhall WTW negatively affecting otter is negligible and no further assessment or mitigation is necessary.

² Nature Scot. *Standing Advice for Planning Consultations – Otters* (2020). Accessed on 17/05/2023 at <https://www.nature.scot/doc/standing-advice-planning-consultations-otters>. [Advice from Scotland is considered applicable in the absence of detailed guidance for England].

³ Chanin P (2003). *Ecology of the European Otter*. Conserving Natura 2000, Rivers Ecology Series No. 10. English Nature, Peterborough.



The only impact on the adjacent water course will be an improvement in the quality of the effluent once the scheme is in operation. If water vole, otter or white-clawed crayfish are present, there will not be a negative impact on them during construction of the scheme.

Invasive Non-Native Species (INNS)

No INNS were identified on site but as a precaution, standard mitigation measures will be adopted to prevent the spread of INNS into the wild. This will include that site personnel would receive information (e.g. site induction / tool box talks) and in the event that suspected INNS are encountered during construction: the works in the suspected area will stop, the machinery will not move, those working in the affected area will follow appropriate biosecurity procedures in accordance with SWS Environmental Management System and the principal contractor will immediately contact a competent ecologist for advice. Equipment brought onto site will also be clean and free from INNS.

Ecological Assessment

The proposed permanent works are entirely within the existing operational boundaries of Chickenhall WTW.

With the application of standard checks and the management measures summarised herein no significant impact on protected species, sensitive habitat, or designated sites are predicted.

Trees & Arboriculture

The site is accessed via Chickenhall Lane which is already used by HGV tankers and it is not expected any of the roadside trees will require trimming. In the unlikely event that any works to these trees are required it will be restricted to light trimming with no limb removal with permission being sought from the third party and under an ECoW.

The site itself has numerous perimeter trees though no works will take place to these trees or within their respective Root Protection Zones (RPZ). Regardless and as a minimum any excavation works and the wider construction of the proposed development will be undertaken in accordance The British Standard "Trees in Relation to Design, Demolition and Construction to Construction - Recommendations" (BS 5837) (2012).

Based on the details and measures above, no likely significant adverse effect on trees are anticipated.

Water Resources

The proposed scheme is required to increase the storm tank capacity which will result in a net benefit to the wider water environment. This will contribute towards meeting the Water Framework Directive's (WFD) objective of good ecological status for the River Itchen which is classified as an WFD waterbody (GB107042022580) - this had a good status in 2019). The operation of the new equipment installed will allow compliance with the tightened environmental permit conditions required by the Environment Agency.

Due to the nature of the works it is unlikely the River Itchen will be directly impacted on by the proposed works and any change to the number of storm releases will be an improvement to what is currently discharged. Due to the nature of the works, which will not be within the channel or



impacting on the banks of the River Itchen, it is assessed that a WFD screening assessment is not required

Pollution prevention best practice measures will be employed during construction and implemented through a site Construction Environmental Management Plan (CEMP). Dewatering of excavations will be carried out in accordance with applicable guidance, Environment Agency regulatory position statements or an Environmental Permit, as required. Appropriate pollution prevention measures will be adopted throughout the development.

Based on the details and measures above, no likely significant adverse effect on water resources are anticipated. The development of the scheme will improve the quality standards of the final effluent released into the environment resulting in a beneficial effect.

Flood Risk

The proposed development falls within Flood Zone 1, which equates to a 1 in 1000 annual probability of river flooding. The area is also at a very low risk of surface water flooding and such no likely significant adverse effect on flood risk is anticipated.

Archaeology and Cultural Heritage

Southern Water's archaeological specialists have been engaged to assess the potential archaeological impact of the works. Initial desk-based environmental assessment has confirmed that there are no designated archaeological / cultural sites / structures within 500m of the proposed works. This includes no scheduled monuments or world heritage sites within 500m. No effects on designated cultural sites are anticipated.

However the assessment identified that Chickenhall is located in an area with archaeological potential – the underlying gravels (which are quite shallow in places) have some geoarchaeological significance. Also, earlier Ordnance Survey maps record the site of a Roman building in the north-eastern part of the WTW which was found c.1911 and included an apsidal stone building and a possible bath (so interpreted as a possible villa). A stone coffin (with partial occupant) was found around 500m to the west at the same time – this would likely place it close to the railway line west of the WTW, although the HER records it within the WTW itself. However given the uncertainty of its actual location there is the potential for Roman deposits (including further burials if this was part of a larger cemetery) to underlie any part of the WTW where not truncated by previous construction.

Given there is c. 1m of made ground throughout the WTW and that the proposed storm tank is only 20m in diameter, in an area of previous development with existing hard standing c. 100m away from the supposed location of the roman villa an archaeological watching brief will be in place during excavation, to record by record, any archaeological remains disturbed. It is also proposed to make provision for geoarchaeological watching brief given the presence of underlaying gravels in the wider area.

No significant adverse effects on designated cultural heritage features, including listed buildings, will result from the proposed works. With the adoption of suitable mitigation measures and implementation of a written scheme of investigation detailing a watching brief, no adverse effects on unrecorded archaeology and/or geoarchaeology are anticipated.

Landscape and Visual Assessment

The WTW is located within the National Character Area (NCA) Profile:128 South Hampshire Lowlands (NE543) which is dominated to some extent by the Southampton conurbation, with urban areas covering approximately 29% of the NCA.

The proposed scheme itself is situated within an existing WTW and is adjacent to a larger industrial area to the west though the River Itchen to the east is designated for its biodiversity importance. However as detailed in the biodiversity section above the proposed development will not impact upon the habitat or species, nor will they impact on the local distinctiveness of the landscape or prevent any existing access as all the works will be restricted to the current operational WTW area.

The centre of the WTW is located at 13m Above Ordnance Datum (AOD), the site sits on level ground with existing buildings, structures and process units ranging from 2m to excess of 10m in height. The proposed development will consist of an additional storm tank to the three that are currently in situ, though as the above ground element will be no more than 3.5m it will not result in a significant net change in massing. Views from the PRoWs to the east are well screened by belts of broadleaved woodland and the landscaping that runs along the WTW perimeter.

The closest residential receptor is a property to the north west and at its closest is 50m though there are no direct views into the WTW due to extensive landscaping on the fence line of the WTW.

The current WTW has a number of large items of infrastructure and any distant views into the WTW are not anticipated to significantly alter as a result of the proposed works as they are in keeping with the extant infrastructure.

Based on the above, no likely significant effect on landscape is anticipated.

Noise

Construction

The construction of the proposed development will require typical construction plant and machinery including heavy goods vehicles, cranes, excavators, dumpers, and small plant and hand tools. The closest residential receptors are at their closest 50m to the north west and the ecological receptors as detailed in the earlier Ecology section above.

During construction appropriate working hours and good working practices in accordance with BS5228 –Parts 1 & 2:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites will be followed (including sensitive timing of potentially noisy work) which will lower the potential for noise impacts. Liaison will take place with the closest residential receptors so they will be aware of the construction programme duration and when noisier activities will take place.

With the implementation of these control measures, sensitive working practices and the relatively standard nature of the works, no likely significant effect is anticipated as a result of temporary noise levels during construction.

Operation

As part of the proposed works no new noise sources will be introduced to the site and as such no likely significant effect is anticipated as a result of operation of the proposed scheme.



Rights of Way and Local Disturbance

As detailed in the traffic management section above though the proposed development will lead to a temporary increase in traffic on local roads though it is not expected there will be a significant nor noticeable increase given the existing surrounding land use being an industrial rather than residential area. There is a public right of way to the east of the WTW that follows the flood levee, though the proposed development will not impact on the use and access to this PRow.

Odour and Dust

The proposed development will not result in any new sources of odour from what is currently on site.

During construction good practice measures will be implemented such as damping down of dust generating activities will be undertaken and specified in a Construction Environmental Management Plan.

Given the nature and relatively small nature of the excavation works dust emissions from the proposed works are unlikely to result in any impact at these receptors.

Cumulative Effects

A review of local planning portals shows there are no current or planned developments that could result in a significant cumulative impact.

Given the relatively low numbers of construction and operational vehicle movements associated with the WTW proposed development and the good standard of existing access it is not expected there will be any significant cumulative effects.

Risk of Major Accidents and/or Disasters

The proposed processes and existing WTW site do not present a significant risk from major accident and/or disaster.

Risk to Human Health

The proposed additional processes provide no significant risk to human health. Once operational the proposed works will improve the quality of treated effluent being released to the environment, which further safeguards human health.

Conclusion

The proposed permanent development is entirely within an existing WTW site. Standard construction methods and management tools are proposed to be used during construction to manage any potential impacts and where needed addition site specific measures will also be implemented as required. Therefore, our assessment has concluded there will be no significant effects on ecologically significant habitats or protected species and no long-term impacts on the human or built environment.



In view of the project design, planned project management and our assessment of the areas to be affected, Southern Water is of the opinion that the proposed development would not generate significant environmental effects and therefore the proposed upgrade scheme does not constitute a development for which EIA is required. We request the authorities opinion in this matter.

Should you have any queries regarding this request or require any further information then please contact me.

Yours faithfully,

John Nicklin
Principal Environmental Advisor
Southern Water Services Ltd.

Enclosures.

- Environmental Information Map
- Proposed site layout

Appendix A: Environmental Information Map



