

Hampshire Water Transfer and Water Recycling
Project
Southern Water

Application	CS/24/97534
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Monday 22 July 2024

Dear Sir/Madam

Application No:	CS/24/97534
Description:	Southern Water consultation - Hampshire Water Transfer and Water Recycling Project
Site:	Havant Thicket Reservoir to Otterbourne Water Supply Works

Thank you for notifying Eastleigh Borough Council (EBC) of the Summer 2024 consultation in relation to the above project.

Within Eastleigh Borough the project involves a section of the proposed pipeline crossing the north of the borough, together with the construction compounds L1, L3, L4, L5 and L6. No permanent above ground features are proposed within the borough. In response to the consultation documents we would wish to make the following comments:

Principle of the project

It is noted that South-East England is considered to be an area of 'serious water stress'. There are significant challenges delivering water supply, including population growth and the need to limit abstraction from sensitive chalk streams. It is noted that there is currently a shortfall of 166 million litres of water per day in Hampshire and this is likely to increase to 200 million litres per day by 2050. This scheme would provide up to 90 million litres of water a day and is likely to be in use in 2035. While only a small length of the pipeline route and construction compounds are in the borough, the issues of water supply and quality are key issues for development in the borough. There is a need for investment in infrastructure in addition to water efficiency measures.

EBC Planning Policy has inputted into Southern Water's draft Water Resources Management Plan and look forward to working together to improve water supply. The

principle of water recycling is supported in general and the proposed infrastructure investment welcomed. Opportunities should be taken however to improve the sustainability of the scheme through the use of renewable energy. In addition, processes should be put in place to ensure high standards of water quality on completion and into the future including high standards of maintenance and regular monitoring of water quality.

Air Quality

The area affected by the project does not lie within any EBC Air Quality Management Area. In general, the approach as described in the Preliminary Environmental Information Report (PEIR) - Chapter 6: Air Quality and Odour appears to be adequate, taking into consideration a comprehensive list of legislation and guidance. In addition, the guidance documents referenced in the Outline Construction Environmental Management Plan (CEMP) and in Appendix 6.1 - Construction Dust and Fine Particulate Matter Assessment Methodology also seem appropriate.

The main impacts identified at the construction and demolition phases will be managed through the CEMP and Dust Management Plan. However, considering the size of the project, it would also be beneficial to review industry best practices published in the Construction Industry Research and Information Association (CIRIA) C741 Environmental Good Practice on Site Guide (Fourth Edition, 2015) and the Greater London Authority (GLA) Control of Dust and Emissions During Construction and Demolition Supplementary Planning Guidance (SPG, 2014).

Heritage

Stroudwood Farmhouse (Grade II listed) is 200m north-east of the route and 100m from the nearest corner of the proposed compound with a new access approximately 100m up the road to the north. As the pipeline is underground and not too close to this heritage asset, it is not considered that the project would have an adverse impact on the property.

Having crossed through the Winchester District indent the route then passes under fields going north of a SINC then south of another which itself is south of an Ancient Monument - Marwell Park Pale. This is the nearest of six parts.

Where the route travels towards the stream called Bow Lake just south of the Winchester Road crossing, the last 100m prior to turning west to go under the road is within a SINC and was part of an ancient fish pond associated with the Ancient Monument - Marwell Park Pales, so greater care needs to be exercised here if it cannot be avoided.

It is considered that generally the pipeline route has managed to avoid anything of heritage value in Eastleigh Borough, however the short run and turn under the Winchester Road by Bow Lake would be better avoided if possible.

Ecology

A number of ecological queries arise in relation to the construction and operation of the pipeline, and further clarification should be provided:

Construction

- It is not clear what the active construction length will be at any one time nor for what duration construction will be at any one point. The extent of temporary fencing is also unclear. This information is required to enable consideration of the obstruction of existing wildlife corridors.

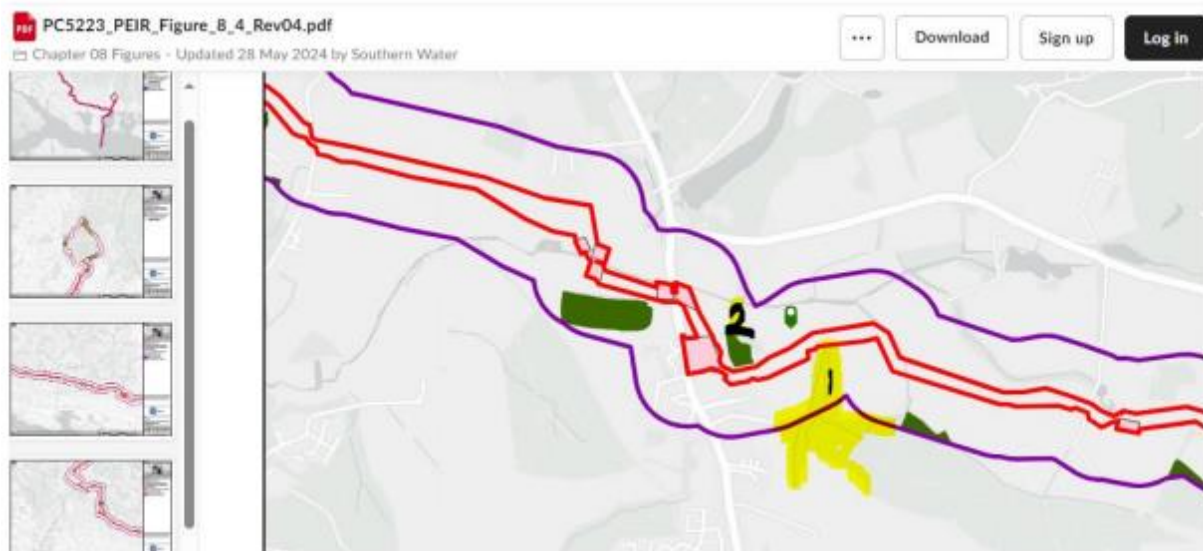
Operation

- How will the water be filtered at the abstraction point at Havant Thicket to ensure all biota is retained in the reservoir?
- Will the treatment process at Otterbourne Water Supply Works result in any reject water entering the River Itchen or any other watercourse? Ecological and geomorphological implications have not been considered if it will. Will this aspect form part of this application or will it only be considered through other consents/ permits?

Further detailed ecological points are as follows:

Ancient Woodland

Not all ancient woodland has been identified on the relevant figures in the PEIR (including the ancient woodland plan in Chapter 8 and the interactive map). This data appears to have been taken from NE/ MAGIC dataset which is incomplete. Within Eastleigh Borough, there are two SINCs within the 200m buffer which have been designated for ancient woodland but have not been identified as ancient woodland within the PEIR. These are shown below:



1 = Chestnut Gully Wood SINC EA0102

2 = The Mount, Fair Oak and Horton Heath SINC EA0098

A minimum 15m buffer between the construction area and these woodlands will therefore also be required.

Fielders Farm Meadows (Eastleigh) SINC EA0097

Construction compound L4 is proposed to be within the SINC. This compound comprises a trenchless construction compound and a sectional site compound.

Whilst it is acknowledged that a trenchless construction compound is required for the trenchless crossing of Winchester Road, the ecological impacts could potentially be less if the sectional site compound part could be located within construction compound L5 instead (on the other side of Winchester Road) which is not designated as a SINC. This could potentially result in the compound area within the SINC being reduced by 900m² which would significantly reduce the temporary loss of SINC habitat.

The SINC is designated for its grassland, flushes, watercourse and the notable species tubular water-dropwort *Oenanthe fistulosa*, although other notable plant and bird species have also been recorded on site. The UKHab Figure 8.6 has identified the SINC as comprising modified grassland only which does not reflect the site's designation. If the temporary loss of habitat in this SINC is unavoidable for use as a compound or for the pipeline itself, then a more detailed survey will be required to inform the construction footprint. The retention and protection of certain habitats within the SINC are essential during construction, notably the wetland habitats and more valuable areas of grassland. However, there is also the potential to enhance other habitats post construction, for example, currently impoverished grassland (as mentioned in section 8.9.29).

It is noted that a habitat reinstatement plan will be submitted in the DCO application.

Veteran and ancient trees

The report has identified seven ancient trees (location not shown) within 200m of the draft Order Limits (presumably data is only from the Woodland Trust's Ancient Tree Inventory). However, it does not identify any veteran trees which are also an irreplaceable habitat. The avoidance of veteran trees must also be an overarching commitment.

The pipeline is proposed to cross several mature tree lines / hedgerows within Eastleigh Borough. Although the working width will be reduced to 20m (from 40m) across these features, survey data is incomplete and there could still potentially be a loss of veteran or ancient trees in this reduced working width.

Further information regarding the impact on individual trees within the Order Limits is

required (within the ES). We would strongly oppose the loss of any veteran or ancient tree and also the loss of any mature tree. Alignment of the route to avoid significant trees is preferable but if unavoidable, other methods of crossing (e.g. trenchless) may be required.

Great crested newt (GCN)

It has been stated that District Level Licensing (available in Eastleigh Borough) will be used. It also however states that GCN are considered absent from the Zone of Influence (ZOI) (section 8.8.35). It is unclear if this statement only applies to Havant Borough Council and East Hampshire District Council which do not have District Level Licensing. Please note that in Eastleigh Borough, GCN are present within the ZOI (within 500m) and the draft Order Limits pass through red and amber zones.

Loss of ecological connectivity during construction

As noted above it is not clear what the active construction length will be at any one time nor for what the duration construction will be at any one location. The extent of temporary fencing is also unclear.

The obstruction of wildlife corridors for prolonged periods during construction can have a significant impact on wildlife including those species mentioned in the PEIR but also hedgehogs and larger fauna such as foxes and deer.

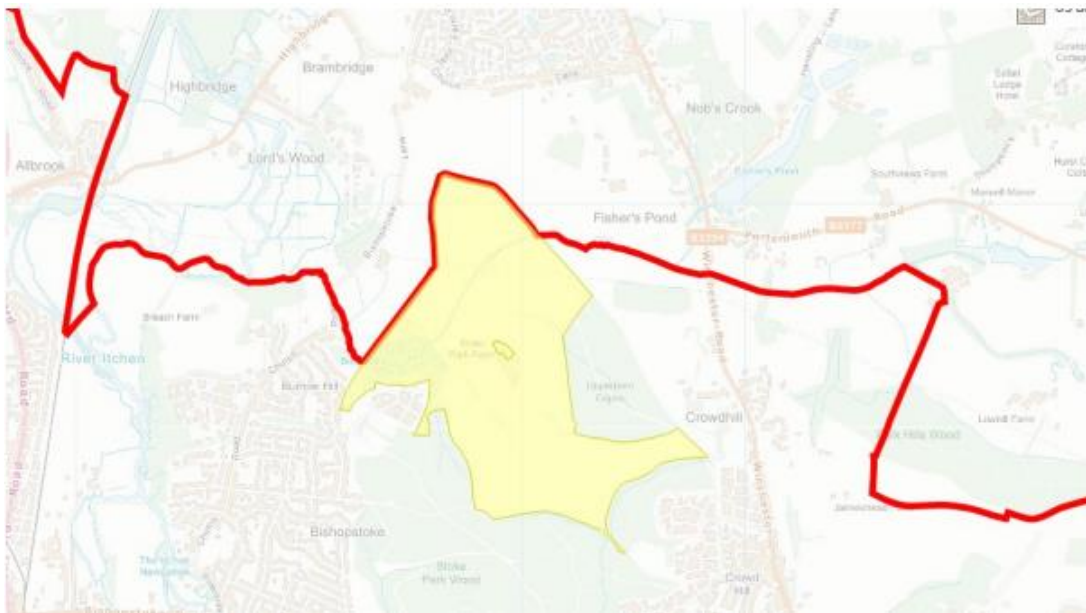
The duration of construction should be kept to a minimum at the crossing points of important wildlife corridors such as hedgerows and treelines. These wildlife corridors should also be restored during inactive periods (e.g. night-time) by repositioning fencing and installing temporary crossing boards. This will also ensure adequate permeability across the construction area is maintained over the construction length. This should be in addition to / complement the secondary mitigation measures outlined in section 8.9.8 (bats), section 8.9.9 (dormice) and section 8.9.13 (badgers, otters, mammals).

Biodiversity Net Gain (BNG) Opportunities

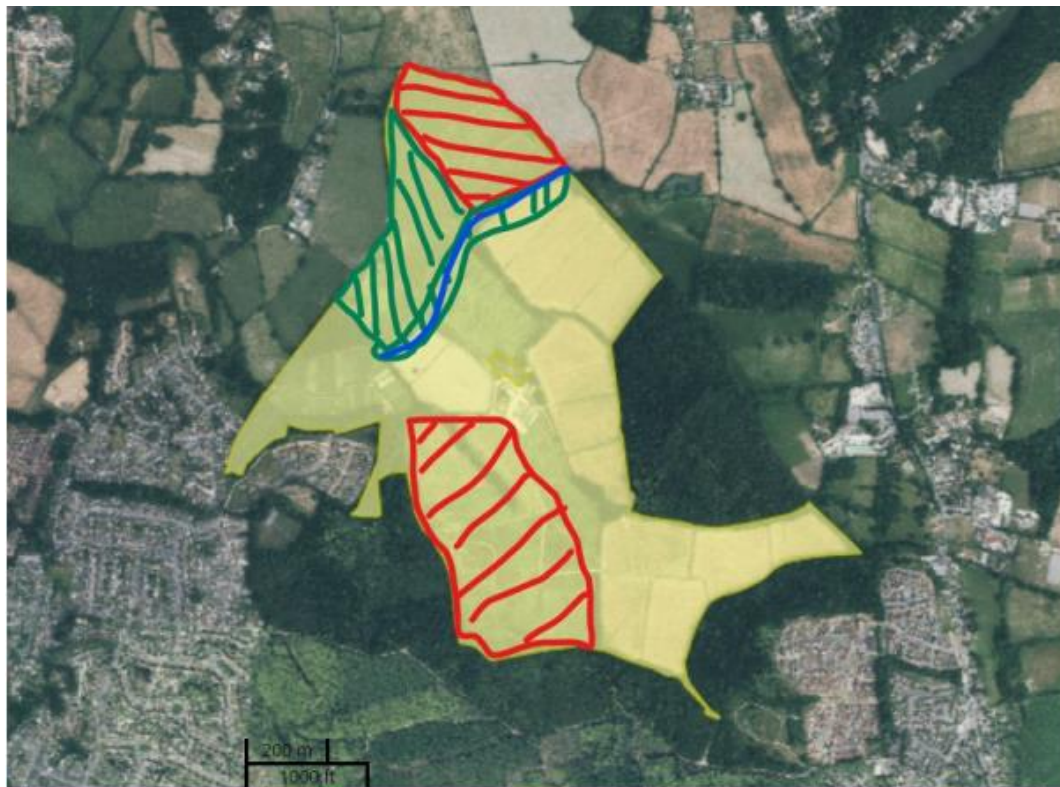
EBC has recently acquired several parcels of land within the Borough for environmental mitigation which can also potentially provide BNG for this project.

Stoke Park Farm:

One of these parcels of land is at Stoke Park Farm at the north of the Borough which is adjacent to the Order Limits of Stretch L. See plan below (yellow shading = EBC owned land; red line = Eastleigh Borough boundary):



We believe there is high potential for BNG within this parcel, including enhancements to the Bow Lake river which is currently overly incised. The plan below shows more detail:



Green hatching = high potential for BNG (approximately 8 ha of south facing slope and Bow Lake corridor)

Red hatching = areas to be excluded from BNG (already accounted for – GCN DLL habitat creation, SANG)

Yellow shading = other opportunities for BNG in the remainder of the site.

This land is also within a biodiversity priority area in EBC's emerging Biodiversity Strategy which is likely to be incorporated into Hampshire's Local Nature Recovery Strategy.

Given the site's proximity to the pipeline route, location within a biodiversity priority area and high BNG potential for habitats and watercourses, we think this would be an ideal site for Southern Water to consider. We would be keen to discuss this further with Southern Water.

Other EBC owned land parcels:

We have other sites which could also potentially deliver BNG as part of the water transfer scheme which we will also be happy to discuss. We are in positive talks with a third-party provider to create a considerable number of grassland/woodland/scrub units within the Borough. There are also two smaller sites "land east of Chickenhall lane" and "land north of Bishopstoke Playing Fields" which have grassland and wetland units potentially available.

We can discuss any of these sites and mechanisms for delivery in more detail.

Trees

The proposed route of the pipeline, within Eastleigh Borough, principally traverses open fields and accompanying field boundaries with trees.

We have little concern regarding the route where it passes through the open fields, except for where compound areas are proposed. These are:

- South of Portsmouth Road / to the west of The Laurels on Portsmouth Road;
- To the east of Winchester Road / to the west of The Mount ancient woodland;
- On either side of Winchester Road (boring sites); and
- Adjacent to Bow Lake north of Crowdhill (boring sites).

There are no arboricultural issues with any proposed work in the open fields away from significant trees. Care will have to be taken not to impact the Root Protection Areas (RPA) of any tree, especially at compound boundaries where they are most likely to come close to significant trees. However, without detailed arboricultural information (Tree Survey, Arboricultural Impact Assessment, Arboricultural Method Statement and Tree Protection Plan) it is not possible to assess the impact and, therefore, mitigation and protection measures.

Of significant concern is the impact of the proposed open cut method through field boundaries. There appears to be 9 instances (in seven locations) where open cut will traverse a field boundary. These are:

1. Approximately 75 metres north of the B3037 at the Borough boundary, where significant, mature trees form a linear feature.
2. Approximately 175 metres to the southwest of The Laurels on Portsmouth Road / southern boundary of potential compound where significant, mature trees form a linear feature.
3. Approximately 200 metres to the west of The Laurels on Portsmouth Road / northern boundary of potential compound and access. This appears to miss the mature trees, although the Limits of Deviation do encompass mature trees.
4. Approximately 100 metres to the east of Stroudwood Lane. Smaller trees form a linear feature here, therefore it may result in less arboricultural impact.
5. Approximately 300 metres west of Stroudwood Lane on the Borough boundary, where significant, mature trees form a linear feature.
6. 400 metres to the south of Rookery Farm on Portsmouth Road / to the east of Chestnut Gully Wood. Smaller trees and hedge form a linear feature here, there it may result in less arboricultural impact.
7. To the southeast, south and southwest of The Mount ancient woodland. Here the open cut trench will cross 3 bands of mature trees and comes close to several significant individuals.

There are also two locations where the proposed route will be tunnelled: under Winchester Road, which includes a mature tree line; and under Bow Lake north of Crowdhill, which includes several mature trees. However, because of the methods used in these two locations, our only concerns would relate to the compounds.

It is obvious, given the proposed route and methodology, that there will be a loss of significant, mature trees, at the points identified above, which we would object to. However, as no detailed arboricultural information has been supplied, it is not possible to assess the impact in a detailed manner.

Further – and critically – we have particular concern that while “ancient” trees are mentioned in Chapter 8, with the document identifying 7 trees within 200 metres of the Order Limits, there is a lack of identification or even acknowledgement of “veteran” trees and their importance, and of mature trees in general, especially where they form important linear features, such as at field boundaries. Veteran trees may pre-date ancient woodland (which is considered in the document) and are given equal

weighting to ancient trees in national policy and in governmental standing advice. Therefore, we are concerned by the failure of the arboricultural information to identify whether there are any present within or close to the Order Limits. It will be critical to identify whether any veteran trees are present and the impacts to any mature tree, as well as ancient and veteran ones, at an individual tree level.

Chapter 13 (Landscape and Visual) does mention trees, including veteran trees, but it is from a landscape perspective rather than ecological. While amenity / landscape value is not disputed, we are clearly moving away from identifying impacts using this singular benefit – we will need to be assessing the arboricultural impact primarily from an ecological and ecosystem services perspective.

Climate Change

It is considered that the proposals follow industry standard assessment methods and the mitigation for reducing emissions during construction stage is reasonable, but needs to be agreed.

Regarding the use of solar panels, reference is made to the efficiency / cost of using the grid compared to installing and maintaining themselves. There is no guarantee that the grid will decarbonise as forecast and the cost and payback period for solar installations makes them a viable option.

If Southern Water is to move towards Net-Zero by 2035 as planned then it would be much better to install solar and thus guarantee low carbon electricity as it removes reliance from the grid, of which, the project has no control over.

Contaminated Land

Chapter 11 detailed the baseline conditions from previous investigations, and assessed the likely significant effects derived from contaminated land. The impacts from exposure to contaminated soils, direct impact of groundwaters, impacts on surface water and ecological habitats and impacts on the built environment are estimated to be minor to negligible. There is reference to a CS3 designation (due to ground gas concentrations); however, this seems to be not applicable to the section that is crossing Eastleigh Borough. The report indicates that further investigation is being undertaken and an updated report will be produced once the new data becomes available. EBC would wish to review this report.

Landscape impact

Overall, the changes to the proposals continue to reduce the landscape impact of the project, with the removal of any permanent above ground plant from within Eastleigh Borough. Subject to the planned refining of the scheme, further details and suitable landscape mitigation (including addressing the issues related to trees and ecology) it is considered that the proposals should be able to avoid any significant long term landscape impact within Eastleigh Borough.

Noise

The proposed construction compound L3 is sited across the road from Hillview Manor Park, which is a park home site. As such this would be a particularly sensitive location, due to the poorer sound insulation of park homes compared to conventional builds with modern double glazing and brick construction. The main concerns relate to any significant activity in the compound occurring at night. If there is expected to be much activity on this site at night then consideration should be given to an alternative location for this compound.

Traffic and Transport

The project results in a small volume of additional traffic movements during the construction phase which are not considered to have a significant impact on capacity or congestion. The Travel Plan for the works aims to minimise the number of movements by encouraging staff to share transport from compound sites.

During construction, it should be possible to put in place appropriate traffic management plans to ensure that disruption to public transport and motor traffic is minimised. Appropriate advanced warning and signage to warn of construction traffic and site accesses should be installed prior to the commencement of construction works.

The project documentation should acknowledge that Bishopstoke Lane and Church Road are unsuitable for HGV traffic and HGV routing agreements should be put in place to ensure that site traffic uses the most appropriate routes. In addition EBC support the comments of Hampshire County Council as local highway authority in relation to concerns about access to construction compounds via Bishopstoke Lane.

Please note, in addition to the comments set out above EBC will rely on the comments from Hampshire County Council in relation to highways, flooding & drainage, archaeology and rights of way, and reserves the right to comment on any amended or additional documents prepared in relation to this project.

Please note these comments have been provided by officers and are without prejudice to any formal comments Eastleigh Borough Council may wish to make once the application is submitted to the Planning Inspectorate.

Yours faithfully

A handwritten signature in black ink, appearing to read "N Parker", written over a horizontal line.

Nicholas Parker
Planning Manager