
Gate three query process

Strategic solution(s)	HWTWR
Query number	HAM002
Date sent to company	29/08/2024
Response due by	05/09/2024

Query

Please provide additional clarification on the programme of activities and environmental surveys. Specifically Table 4.2 in Annex 3 gives a high level summary of environmental activities and undertaken but doesn't capture the level of detail to allow us to confidently form a view on whether or not the solution has a clear, appropriately resourced and achievable pathway to securing the necessary consents.

Please provide additional clarification on the programme of activities and engagement to secure environmental permits, specifically new discharge activities required for the operation of the proposed water recycling plant, as referenced in Table 6.3 of Annex 6 as this doesn't capture the level of detail to allow us to confidently form a view on whether or not the solution has a clear, appropriately resourced and achievable pathway to securing the necessary consents.

Solution owner response

We have divided our response into two sections, to better provide additional clarification on each.

- Environmental Surveys and Activities
- Environmental Permits

Our Hampshire Water Transfer and Water Recycling Project (HWTWRP) delivery teams have continued to work on our Development Consent Order (DCO) application since the preparation for the Gate Three submission was “frozen” for assurance purposes in February 2024, prior to the informal submission in March 2024. The clarifications provided in this response will therefore differ slightly from the detail provided within the formal submission (July 2024), which, although correct at the time of writing, has been superseded by more recent delivery schedules.

The activities and timescales provided below have been taken from our live Strategic Resource Option (SRO) schedule which continues to be updated on a regular basis as surveys, regulator workshops, customer feedback and design changes continue to influence the detail of our path towards the DCO submission and Gate Four submission. All information provided below has been discussed with the relevant regulators through technical working groups but was deemed too detailed for the Gate Three submission.

Environmental Surveys and Activities

Following engagement with the Environment Agency in relation to this query, this response has focused on providing an update on ecological surveys only. All other environmental surveys are in progress in accordance with Table 4.2 in Annex 3 of the Gate Three submission.

Table 1 provides an update of the ecological surveys that have been completed since the submission of Gate Three in July 2024 and those that are planned to be undertaken up until Gate Four where necessary. This list may evolve depending on the findings of the surveys and any developments to the design of the HWTWRP (for example following feedback received during Statutory Consultation). Timings of these surveys are also subject to change and are dependent on the ability on obtaining land access.

Table 1: Status of Terrestrial and Aquatic Ecological Surveys as of 04.Sept.2024

Task	Sub-task	Current Status	Survey Completion
Bats	Ground Level Tree Assessment	99% complete. One more area to survey arranged for mid-September 2024.	September 2024
	Tree climbing	70% complete (138/200 trees climbed). All remaining surveys are being arranged for September 2024.	September 2024

	Building surveys	55% complete (13/24 buildings). All remaining locations are being arranged for September 2024.	September 2024
	Habitat Suitability Modelling (static deployment)	Surveys 100% complete. Final analysis in progress.	August 2024
	Emergence	20% complete (4/24 emergences). All remaining locations are being arranged for September 2024.	September 2024
	Night time walkover	60% complete (5/8 transects). All remaining locations are being arranged for September 2024.	September 2024
Badger		99% complete.	September 2024
Dormouse		85% complete. All remaining locations are being arranged for October 2024.	October 2024
Riparian mammals		100% complete.	July 2024
Habitats	UK Hab	92% complete. All remaining locations are being arranged for September 2024.	September 2024
	National Vegetation Classification	75% complete. All remaining locations are being arranged for September 2024.	September 2024
	Hedgerows	64% complete. All remaining locations are being arranged for September 2024.	September 2024
Freshwater	Macroinvertebrates	85% complete. All remaining locations are being arranged for September and October 2024.	October 2024
	Southern Damselfly	Undertaken by Hampshire and Isle of Wight Wildlife Trust	July 2024
	Modular River Physical MoRPh/Biodiversity Net Gain (BNG) ditch assessment	99% complete. One site remaining for Autumn 2024 along with the macroinvertebrate surveys.	October 2024

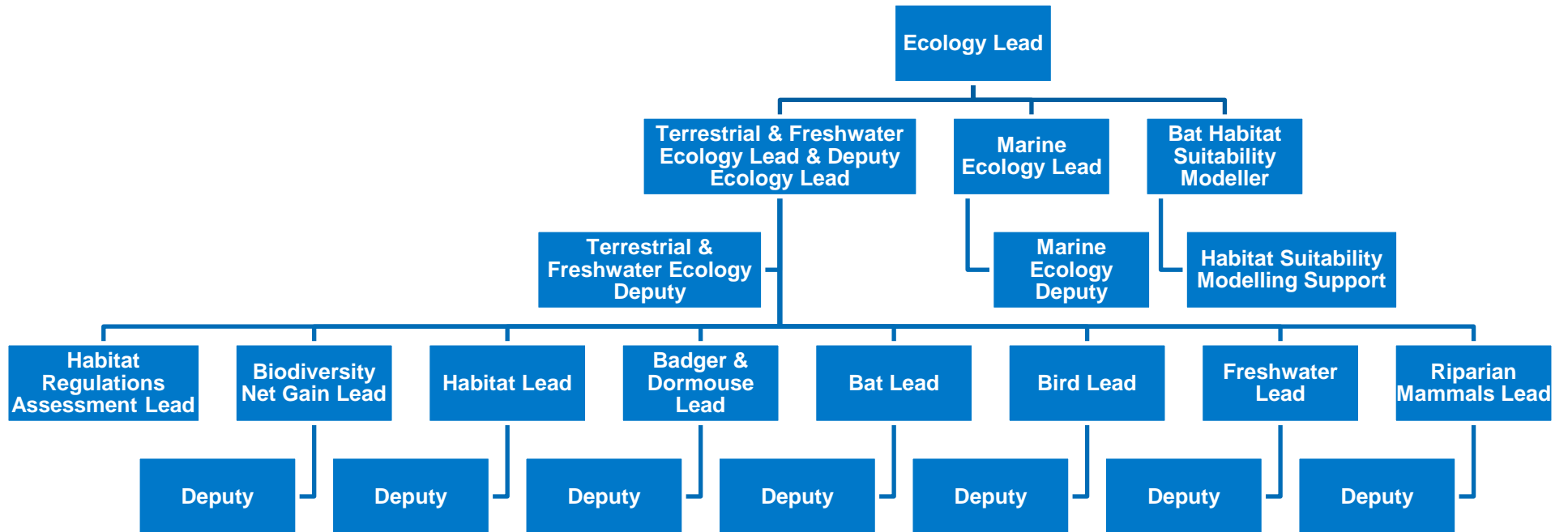
All bird, white clawed crayfish, macrophyte, fish and marine ecology surveys required for the Environmental Impact Assessment were complete at the point of the formal Gate Three submission (as described in Table 4.2 in Annex 3 of the Gate Three submission) therefore no further updates have been provided as part of this response.

The ecological surveys above are required to inform the development of the design and to inform the Environmental Statement (ES) and supporting ecological workstreams including BNG and the Habitats Regulations Assessment (HRA).

Southern Water's ecology team as shown in Figure 1, comprises both SW specialists and supply chain experts and are a combination of full time and part time equivalents onboarded since Gate Two to support the forward programme. The organogram demonstrates the range of the responsibilities, capabilities and structure of the team. The Gate Four financial forecast (included within our Gate Three submission) includes these resources. This applies to all organograms within this response.

Figure 1: Hampshire Water Transfer and Water Recycling Project

Ecological Team Resource



Supported by the following surveyors:

- 9 Arboriculturalist undertaking arboriculture surveys.
- 3 Heritage Specialists undertaking veteran tree surveys.
- 25 Ecologists including terrestrial, aquatic, INNS, and marine undertaking ecological surveys to support the Environmental Statement and Biodiversity Net Gain Assessment.

All surveys that require access to third party land are arranged via the Land Team onboarded since Gate Two (see Figure 2).

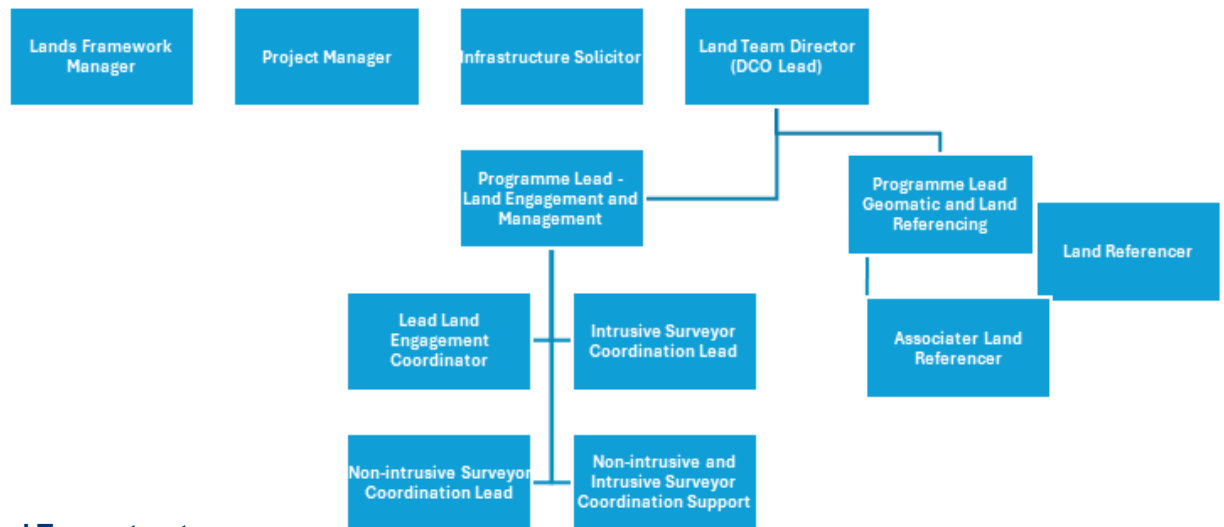


Figure 2 Land Team structure

Southern Water submitted the Preliminary Environmental Information Report (PEIR) in May 2024 in support of the Summer 2024 Consultation which closed on 23rd July 2024. The PEIR and other consultation material can be found here:

<https://www.hampshirewtwrp.co.uk/> .

We are reviewing feedback received following the consultation from statutory, non-statutory stakeholders, landowners and the public. This feedback is continuing to help shape the design of the project and the environmental impact assessment process. We have commenced the assessment work for the ES including preparing the ES Delivery Plan, Terminology Guide and Template and have started to draft the up-front sections of each topic chapter (Introduction to Baseline section) and other supporting documents including the BNG Assessment, the Outline Landscape and Ecological Management Plan and the Skills and Employment Plan.

Table 2 provides further information on the activities associated with the key environmental workstreams required to be submitted with the DCO including the HRA and Water Environmental Regulations (WER) Compliance Assessment. This programme shows those activities from June 2024 onwards, where green indicates completed activities, amber indicates those that are in progress and grey are activities which have not started.

Southern Water have onboarded a specialist EIA team during Gate Two to undertake the EIA, this team are therefore responsible for preparing the ES and supporting documents, as shown above, required to be submitted alongside the DCO, as shown in Figure 3.

Table 2: Plan on a Page showing the activities associated with the key environmental workstreams as of 04.Sept.2024

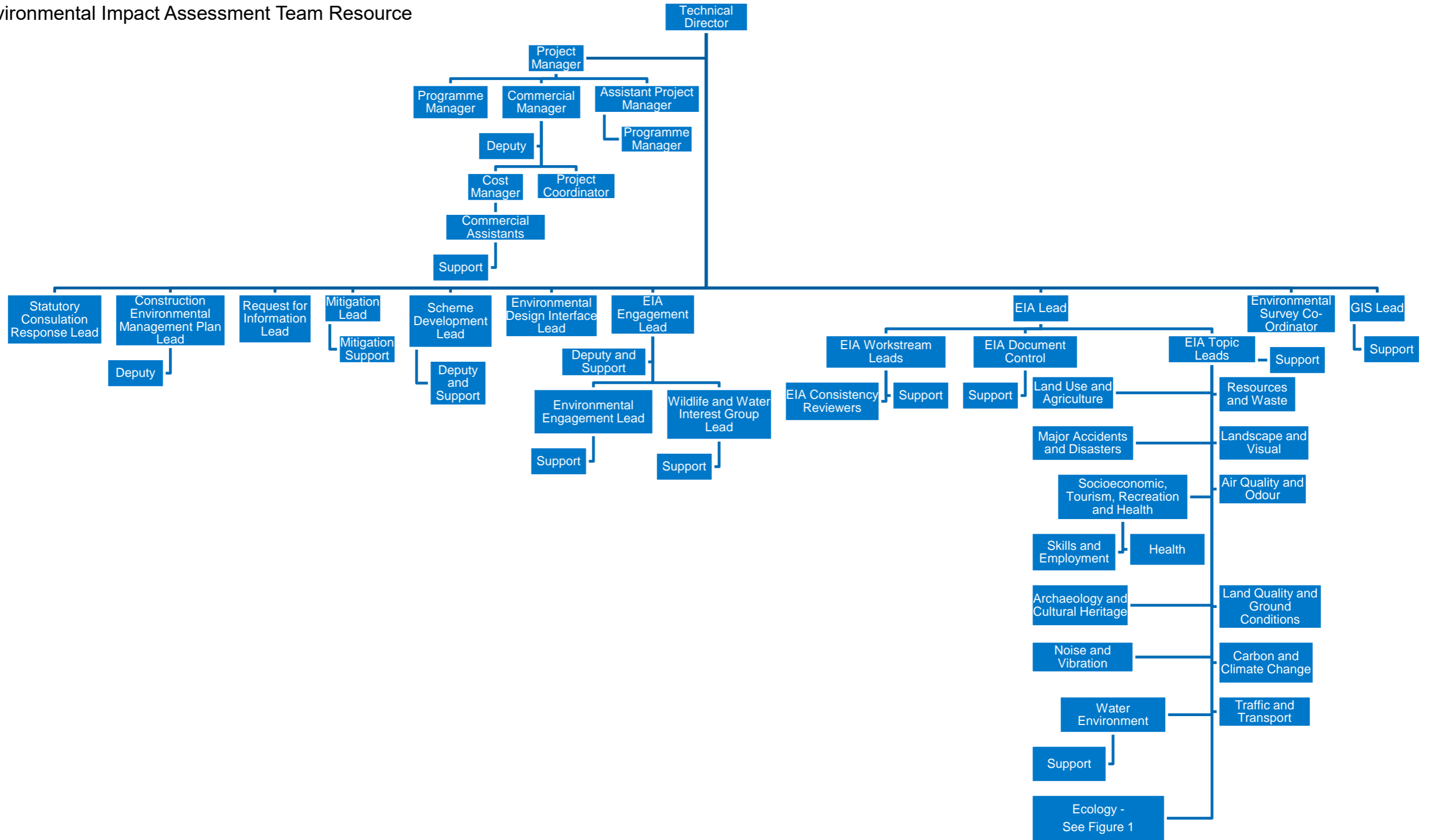
Workstream	Task	June 2024	July 2024	August 2024	September 2024	October 2024	November 2024	December 2024	January 2025	February 2025	March 2025	April 2025	May 2025	June 2025	DCO Application	July 2025	August 2025	September 2025
Project Milestones	RAPID Formal Gate 3		■															
	End of Statutory Consultation (Summer 2024 Consultation)		■															
	Published Water Resources Management Plan												■					
	DCO Application													■				
	RAPID Gate 4																	■
Environmental Statement	PEIR to ES Translation and Development of Guidance	■	■															
	Prepare ES Delivery Plan	■	■															
	ES Templates and Delivery Plan Review and Approval		■															
	ES Writing and Review Period	■	■	■	■	■	■	■	■	■	■							
	Final ES Review and Approval											■	■	■				
	Non-Technical Summary, Preparation, Review and Approval									■	■	■	■	■				
Biodiversity Net Gain	Preparation of BNG Strategy		■	■														
	Development of BNG Assessment Report			■	■													
	BNG Metric and Calculations				■	■	■											
	Preparation of BNG Plans				■	■	■	■										
	Engagement with Local Planning Authorities				■	■	■	■	■	■								

Workstream	Task	June 2024	July 2024	August 2024	September 2024	October 2024	November 2024	December 2024	January 2025	February 2025	March 2025	April 2025	May 2025	June 2025	DCO Application	July 2025	August 2025	September 2025
	Final BNG Report Review and Approval						■	■	■	■								
Habitat Regulations Assessment and Marine Conservation Zone Assessment	Draft HRA Stage 2 and MCZ Assessment		■	■	■	■												
	Regulator Review Period						■											
	Update HRA Stage 2 and MCZ Assessment							■	■									
	Review updated HRA Stage 2 and MCZ Assessment								■	■								
	Regulator Review Period									■								
	Finalise HRA Stage 2 and MCZ Assessment and Approval											■	■	■				
Water Environment Regulations Compliance Assessment	Review Draft HRA Stage 2			■														
	Preparation, Review and Approval of WER Compliance Assessment			■	■	■	■	■	■	■	■	■	■					
Hydrological Impact Assessment	Review of updated and finalised Ground Investigation Data					■												
	Update baseline and conceptual model						■											
	Undertake qualitative impact assessment						■											
	Undertake quantitative impact assessment						■	■										

Workstream	Task	June 2024	July 2024	August 2024	September 2024	October 2024	November 2024	December 2024	January 2025	February 2025	March 2025	April 2025	May 2025	June 2025	DCO Application	July 2025	August 2025	September 2025
	Preparation, Review and Approval of HIA																	
Invasive Species Risk Assessment	Risk Assessment (SAI-RAT)																	
	Preparation, Review and Approval of Biosecurity Management Plan																	
Havant Thicket Reservoir Environmental water quality modelling	Confirmation of Baseline and Input Parameters																	
	Compensatory Flows Water Quality Modelling																	
	Additional Degradation Modelling (if required)																	
	EQS Solent dispersion modelling																	
	Sustainable drainage systems (SuDS) Modelling																	

Figure 3 : Hampshire Water Transfer and Water Recycling Project

Environmental Impact Assessment Team Resource



Environmental Permits

At Gate Three SW submitted a draft schedule of the other permits, licences and consents (PLCs) (Table 6.3 Annex 6: Programme and Planning) likely to be required for the HWTWRP, setting out indicative preparation and determination timescales. As stated in Annex 6, any PLCs required at the application stage will be applied for in parallel with or as part of the DCO itself, otherwise they will be deferred to the appointed delivery contractor to manage post-DCO consent.

SW has committed to submitting a proposed strategy for achieving other PLCs as part of its DCO application and is currently engaging with the Environment Agency (EA), Natural England (NE) and Marine Management Organisation (MMO) on a draft of this strategy through the monthly Technical Working Group (TWG) meetings. As the strategy is developed further, building on feedback from stakeholders, the PLC table in Annex 6 and any associated timescales will be updated accordingly.

With specific regard to the bespoke new surface water discharge environmental permit, operation of the Water Recycling Plant (WRP) will require use of the Eastney Long Sea Outfall (LSO) to discharge reject water into the Solent and also to discharge recycled water into Havant Thicket Reservoir. Therefore there will be a change required to the existing permitted Budds Farm Wastewater Treatment Works discharge conditions. A separate environmental permit will be prepared and submitted to the Environment Agency (EA) to authorise these discharges.

The permit will include all surface water discharge activities (e.g. run to waste activities; the discharge of reject water from the proposed WRP into the Solent via the LSO, and the discharge of recycled water into the reservoir).

SW has commenced discharge permit discussions through the All Company Working Group (ACWG) sessions (at a high level to create our working assumptions and draft strategy) to ensure alignment to other SRO projects. SW will be undertaking regular reviews (at minimum monthly) with the National Permitting Service (NPS) and NE with the aim to submit the pre-application and position statement in December 2024.

Table 3 provides a high level programme of our current working assumptions for the activities required up to submission of the formal permit application (green indicates completed activities, amber indicates those that are in progress and grey are activities which have not started).

The preliminary H1 Risk Assessment has been completed. Marine samples will continue to be taken during the pre-application phase to support the permit application, the number of samples and overall period of sampling will be agreed with the EA and any requirements will be built into the forward programme once confirmed.

Key points for discussion during engagement with NE and NPS include:

- Preliminary H1 Risk Assessment
- Marine Mixing Zone modelling – model conditions (tides / wind etc)

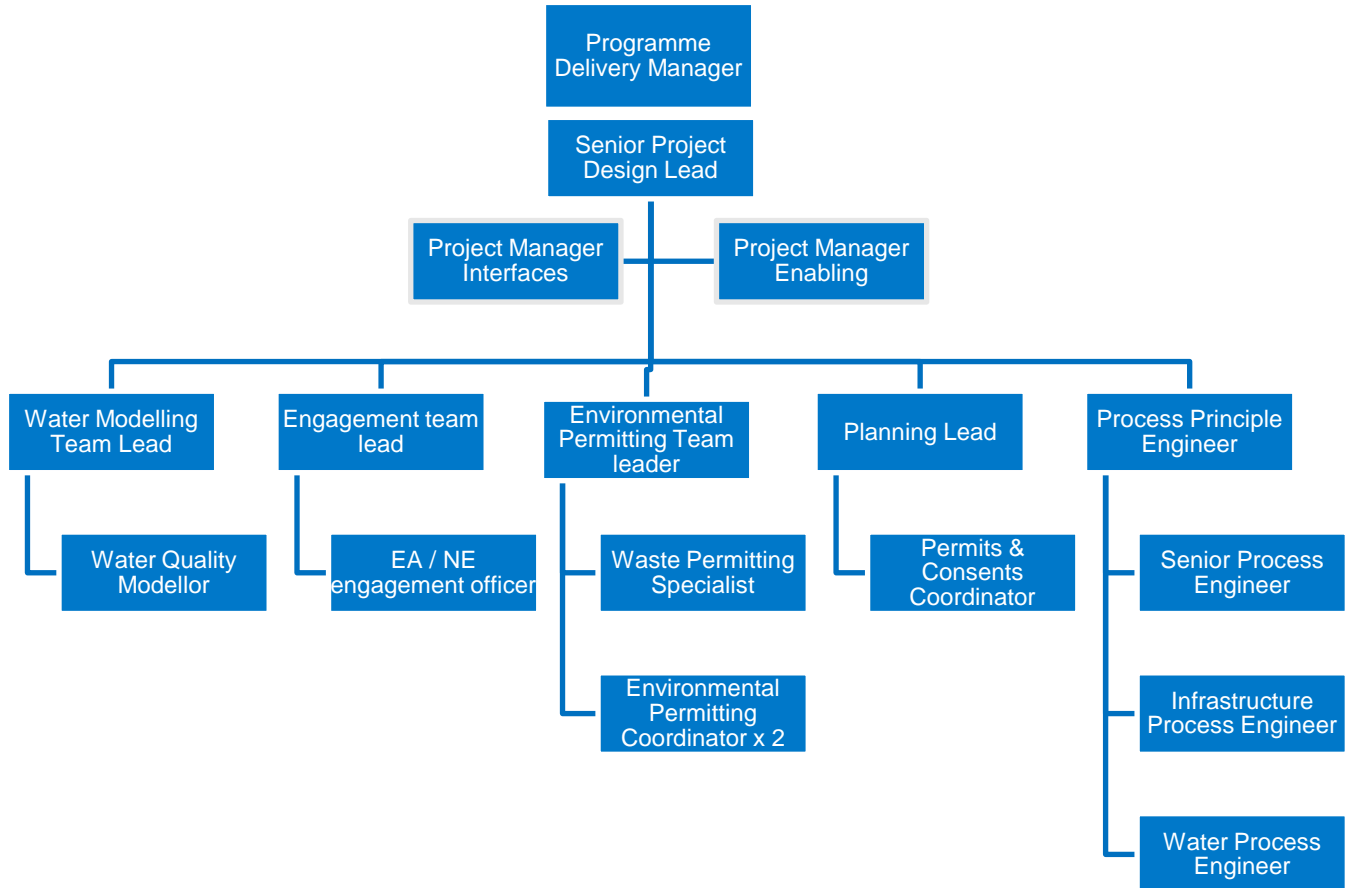
- WQ sampling (marine), number, period for sampling
- Permit parameters / emerging EQS requirements

Figure 4 provides an overview of the organisational structure and input required from the existing project team to progress the new surface water discharge environmental permit.

Table 3 Plan on a Page showing the activities associated with the Discharge Permit application as of 04.Sept.2024

Workstream	Task	June 2024	July 2024	August 2024	September 2024	October 2024	November 2024	December 2024	January 2025	February 2025	March 2025	April 2025	May 2025	June 2025	June DCO Application	July 2025	August 2025	September 2025
Project Milestones	RAPID Formal Gate 3																	
	End of Statutory Consultation (Summer 2024 Consultation)																	
	DCO Application																	
	RAPID Gate 4																	
Discharge Permit process	H1 Risk Assessment																	
	Marine Mixing Zone Modelling																	
	Submit Pre-Application																	
	Pre-Application process																	
	Submit discharge permit application																	

Figure 4 Discharge Permit – Project Support Organogram



Date of response to RAPID	05/09/2024
Strategic solution contact / responsible person	REDACTED