

FAREHAM

BOROUGH COUNCIL

Head of Planning
[REDACTED]

The Examining Authority
The Planning Inspectorate
hampshirewaterproject@planninginspectorate.gov.uk
(sent by email only)

Contact: [REDACTED]
Direct Dial: [REDACTED]
Email: [REDACTED]
Date: 27 August 2026

Dear Sir/Madam,

**Fareham Borough Council - Relevant Representation
Hampshire Water Transfer and Water Recycling Plant Development Consent Order
Application by Southern Water Services Limited**

Following the Planning Inspector's confirmation that the above project has been accepted as an application for a Development Consent Order (DCO) to construct a Water Recycling Plant at Broadmarsh in Havant, and to run a pipeline from the Havant Thicket reservoir to Otterbourne Water Plant near Winchester, Fareham Borough Council (the Council), as one of the host authorities, requests to be registered as an Interested Party at the Examination.

Following an initial review of the DCO application documentation, this letter provides a summary of the issues which the Council currently agrees and/or disagrees with together with an appropriate explanation in accordance with Planning Inspectorate note 8.3. The comments/views expressed in this representation therefore are made without prejudice to a detailed assessment of the examination documents and the Council reserves the right to raise any further matters/issues at a later stage and as part of our Local Impact Report (LIR) and subsequent Written Representation.

In summary, an outline of the principal topics which the Council intends to address in relation to the application during the examination will cover the following:

- Biodiversity and Ecology;
- Landscape and Visual Impact;
- Noise and Pollution;
- Land Contamination;
- Cultural Heritage (Archaeology)

Matters regarding traffic, highways and access will be dealt with by the Local Highway Authority at Hampshire County Council. Matters regarding surface water and flood risk will be dealt with by the Lead Local Flood Authority, at Hampshire County Council.

[REDACTED]
Tel: [REDACTED]
Answer phone: [REDACTED] Minicom: [REDACTED]
DX 40814

Please also note that these representations relate only to matters where the pipeline passes through the Council's administrative area, and the proposed construction of the Intermediate Pumping Station within the Borough as the Council has raised no objections to the principle of the creation of the water recycling plant, which is located within the administrative area of Havant Borough.

The Council has the following comments to make at this stage.

Biodiversity and Ecology

A broad suite of ecological surveys and investigations have been undertaken by the Applicant. The results of these surveys have been used to inform the ES for the project and to be used in the development of any necessary mitigation measures. However, the following matters of concern remain, and areas where further information and clarification is sought from the Applicant.

Bats

Whilst there will be a 15m buffer between Carpenters Copse Ancient Woodland/SINC and the works, there will be medium-term severance of the woodland/hedgerow network connected to this Ancient Woodland in areas shown below in yellow. Therefore, FBC is not clear why the modelling and survey work (statics and nighttime bat walkovers) did not cover this area, as a sampling location and key connective location, for the presence of bats, particularly Annex II bat *Barbastelle*. Instead, a static was placed at the crossing with the River Wallington, where the impact is limited due to the trenchless nature of the crossing. Given the large number of Ancient Woodlands located to the east, west and north of Carpenters Copse, it is not considered that sufficient survey work has been carried out to understand the baseline and enable impact assessment/proportionate mitigation in the areas to be affected as a result of severance of commuting routes for bat populations.



A number of trees with bat potential were identified and whilst subject to ground level and climbing assessment, with no roosts identified, the surveys were carried out in 2024 and due to the mobile nature of bats and transient nature of roosts, updating surveys will be required. Whilst the need for pre-commencement surveys has been acknowledged, clarification in relation to the timeline for such updating survey work is required.

Whilst the woodland and scrub planting around the proposed Intermediate Pumping Station-F is supported, it is not clear if there will be any requirement for external lighting of the station during the operational phase. Furthermore, is there any scope for further planting to increase ecological connectivity in this area and help with achieving more on-site BNG.

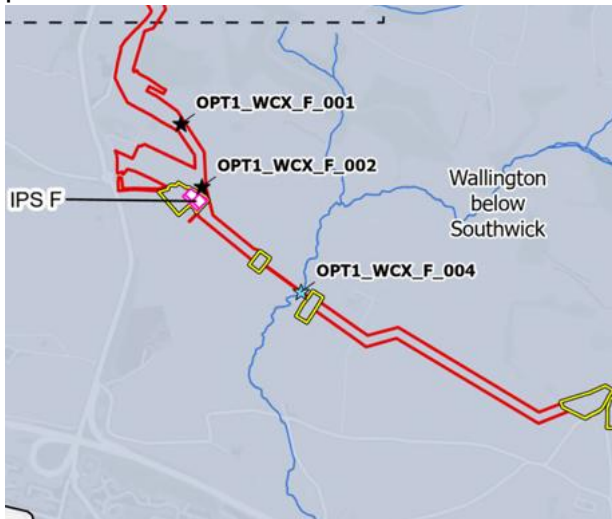
Clarification is required if Compound F-1 is located at least 30m away from River Wallington and if any night-time lighting of the compound during the construction phase will be required.

Badgers

Whilst the survey work is thorough and a number of setts have been identified, the survey work was carried out in March 2025 and due to their mobile nature, pre-commencement updating surveys will be required which has been acknowledged. FBC requires that knowledge of the timeline for undertaking these surveys and submission of the results to the relevant LPAs would be useful, prior to detailed submissions being considered.

Notable fish

Bullhead, an annex II species, European Eel and Brown Trout, S41 species, are present within the River Wallington. Whilst the river crossing will be trenchless, FBC has concern that there is anticipated to be indirect impact as a result of noise to these species, particularly Eel which is understood to be more susceptible to noise levels, with the noise generated from tunnelling likely above the threshold of impact. Could an indication be provided in relation to the duration of tunnelling under this section of the River Wallington?



Otter

As Otter spraints and resting sites are present along the River Wallington, FBC would like to know what enhancement measures along this stretch of the river will be carried out post trenching and construction of compounds?

Clarification is required if Compound F-1 is located at least 30m away from River Wallington and if any night-time lighting of the compound during the construction phase will be required.

CEMP

The submitted CEMP is outline and an indication of the timeline for the submission of a detailed one would be helpful.

BNG

A copy of the BNG Metric in excel format is requested.

INNS

When can a site-specific INNS Method Statement be expected, due to the presence of Himalayan Balsam along the River Wallington.

Landscape and Visual Impact

The principal landscape, design and visual impact concern regarding this project has been the design, siting, and landscape visual impact of the above ground plant (IPS F), taking account of engineering operational requirements to deliver the water supply.

FBC considers that the issues raised and the proposed resolutions as set out in the Draft Statement of Common Ground with FBC are a fair and full reflection of the discussions that have taken place to date.

FBC accepts that the final design of the building, plant, perimeter fencing and planting will be subject to further details once an agreed contractor is appointed. The Design Principles Document (5.11, DCO Vol 5) provides sufficient reassurance and flexibility to ensure that a good quality design can be achieved in due course.

However, FBC would like greater clarity and limitation with regard to IPS-F_6 Building height:

- The current wording would allow for a building higher than 8m if existing ground levels are lowered to meet the second commitment as indicated in the draft SoCG. (extract italics below)
 - *The maximum building height will not exceed 8m from existing ground level at its highest point.*
 - *To reduce the impact on views from the residential areas of Welborne Garden Village to the south west, consideration will be given to embedding the building into the existing levels of the hillside to reduce its height and visibility.*
- FBC would prefer a more strongly worded commitment to 'embedding the building into the landscape' than merely 'consideration'. Moreover, FBC would not wish to see the land raised or profiled as part of such a design with 1:3 slope engineering platforms to achieve a level site.
- FBC would also prefer to see more enhanced mitigation planting '*to protect views from the diverted footpath*', as set out in IPS-F_8 and contained in Design Approach Document – 3 of 3 see p 8 Indicative environmental masterplan figure 3 - indicative above ground plant landscape plans intermediate pumping station f – plan sheet 1

of 2 as amended below and on Environmental Statement - Figure 13.23 Viewpoint photography - 40 of 45 documents



Noise and Pollution

FBC has reviewed the application documentation in respect of noise and vibration issues, set out in Chapter 15 of the ES. Whilst the Intermediate Pumping Station – F is proposed to be located within an area of open countryside at present, and adjacent to an existing copse of trees, the site of the IPS-F is located immediately adjacent to the proposed Albany Estate of the Welborne Garden Village proposal.

Consideration of potential noise issues arising from the Pumping Station has been set out in this chapter, and baseline noise surveys, together with proposed survey methodologies were discussed and agreed with FBC officers.

Due to the limited exposure of nearby residential properties during any construction phase, no concerns have been raised regarding noise or pollution. Future impacts on residents of the Albany Estate were also considered given the proximity of the IPS-F, and subject to the agreed methodologies being complied with, FBC does not consider it likely that noise issues would be generated to a harmful level.

Land Contamination

FBC has looked through the application and consider that ground contamination matters are set out in Section 6 of the submitted ES: - [WA010002-000581-6.2 ES Vol II - ES Appendix 11.2 Geotechnical and geo-environmental reports - 4 of 18 documents.pdf](#). FBC does not believe any further works have been completed so the recommendations should still be relevant, although it is difficult to clarify given the amount of information submitted.

- the areas of support

From a contaminated land perspective FBC support the application.

- the areas of objection

No overriding objection is raised from a contaminated land perspective.

- evidence to support these

The submitted Environmental Statement identifies the Albany Farm Historical Landfill as a potential source of contamination. From a contaminated land perspective, the principal historical land uses of concern associated with the Fareham section of the pipeline route are considered to be the Albany Farm Historical Landfill and the former landfill located within the site.

Potential risks to human health, controlled waters, surface waters and the built environment have been assessed through the development of a conceptual site model, with appropriate pollutant linkages identified where necessary.

In addition, exploratory holes 2F3504DS and 2F3505DS were undertaken to investigate Albany Farm Historical Landfill. The submitted investigations have identified and assessed the potential contamination risks associated with these historical land uses and have recommended further investigation where uncertainties remain.

- proposed mitigation

The submitted reports recommend further targeted ground investigation where contamination risks have not yet been fully characterised, together with additional groundwater monitoring, construction phase watching briefs, stockpile management procedures and measures for dealing with any previously unidentified contamination encountered during the works.

The Outline CEMP includes measures for the management of contamination risks, including risk assessments and method statements, procedures for dealing with unforeseen contamination, appropriate handling and storage of contaminated soils, and the preparation of a Materials Management Plan in accordance with the CL:AIRE Definition of Waste: Code of Practice.

Subject to the implementation of these measures, contamination risks associated with the development can be appropriately managed.

- specific locational impacts

Whilst historical contamination sources have been identified within the Fareham section of the route, including areas of landfill and infilled ground, no significant locational impacts are identified from a contaminated land perspective that would warrant objection to the proposal.

Cultural Heritage (Archaeology)

The pipeline route through the Fareham Borough area runs from the Eastern boundary from Boarhunt Road to the Northern boundary at Crockerhill (Section F) and the pipeline and associated compound construction has the potential to disturb non designated archaeological remains and so falls under Chapter 20 of the NPPF and policies HE1, HE4 and HE5 of the adopted Fareham Local Plan 2037.

Archaeology and Cultural Heritage are dealt with in Chapter 7 and related appendices of the Environment Statement; these and other ES chapters and submission documents (such as the OCEMP, OLEMP) have been reviewed before providing this advice.

This submission includes reports on a detailed desk-based assessment, phases of geophysical survey, geoarchaeological assessment and monitoring of geotechnical investigations as well as a report on a limited amount of trial trenching undertaken to date. These reports have all been previously reviewed and agreed.

There has been extensive discussion and broad agreements on the need for further archaeological evaluation (non-intrusive and intrusive) as well as a range of archaeological mitigation measures for the proposed scheme. These have been incorporated into drafts of an (archaeological) Outline Written Scheme of Investigation, the Design Principles document and within the OLMEP and OCEMP.

All the archaeological work to date, including the desk- based assessments and fieldwork has been overseen and approved by the Hampshire County Archaeological Service providing advice to Fareham Borough Council as can be seen in the Draft Statement of Common Ground. This service was ended by Hampshire County Council in March 2026 and archaeological advice is now provided by the Historic Environment Planning Team for Surrey County Council, specifically [REDACTED] Principal Archaeologist BA Hon MCIfA and [REDACTED] BA Hons MCIfA.

The only currently outstanding issue is the final agreement of the Outline Written Scheme of Investigation. Detailed comments have been provided on a first draft, and a meeting is scheduled to review the comments and formalise the document and update the OLEMP and OCEMP so that they are suitable for submission with the DCO.

Please note that these comments solely apply to non-designated upstanding and buried archaeological remains, with consideration of Scheduled Monuments and built heritage (including their settings) dealt with by Historic England and the Fareham Council Conservation Planner respectively. Further, these comments relate only to that part of the draft Order Limit which lies within the Fareham Borough Council boundary.

Summary

As set out above, Fareham Borough Council does not have any overriding objections to the principle of the development proposal, subject to further consideration of the above matters. The Council has been liaising with Southern Water in the lead up to the submission of the DCO application, and most issues have been considered and largely addressed during the discussions that took place during this time.

If you have any queries regarding the above relevant representations, please do not hesitate to contact me.

Yours sincerely

A large black rectangular redaction box covering the signature area.A small black rectangular redaction box covering the name of the signatory.

Team Leader (Development Management)
Fareham Borough Council