Hampshire Water Transfer and Water Recycling Project (PINS Reference WA010002)

Local Impact Report



23rd November 2026

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Executive Summary

The proposed development area falls outside of the South Downs National Park but within the setting of the National Park.

The table below sets out the South Downs National Park Authority's view on the local impacts associated with the proposed scheme, as submitted. This table assumes the delivery of all currently proposed mitigation measures. The table is ordered by topic area and represents a summary of the points made in Section 6 of this Local Impact Report.

Topic Area	Positive Impact	Neutral or Limited Impact	Negative Impact
Chapter 6 – Air Quality and odour		✓	
Chapter 7 – Archaeology and cultural heritage		✓	
Chapter 8 – Terrestrial and freshwater biodiversity		✓	
Chapter 9 – Marine biodiversity		✓	
Chapter 10 – Carbon and Climate Change		✓	
Chapter 11 - Land Quality and ground conditions		✓	
Chapter 12 – Land use and agriculture		✓	
Chapter 13 – Landscape and Visual			
Chapter 14 – major accidents and disasters		✓	
Chapter 15 – Noise and vibration		✓	
Chapter 16 – Resources and waste management		✓	
Chapter 17 – Socio-economics Tourism and Health		✓	
Chapter 18 – Traffic and Transport		✓	
Chapter 19 – Water Environment		✓	
Chapter 20 – Cumulative and in -combination effects		✓	

Chapter 21 – Summary of likely significant residual effects		✓	

1. Introduction and Terms of Reference

This Local Impact Report (LIR) relates to the proposed Hampshire Water Transfer and Water Recycling Project (HWTWRP) (PINS Reference WA010002**)**, as it relates to the administrative area of the South Downs National Park (SDNP). The South Downs National Park Authority (SDNPA) is the organisation responsible for promoting the statutory purposes of the National Park (see section 3 of this report) and the interests of the people who live and work in it. SDNPA is the Local Planning Authority for the National Park.

1.1 The proposed development is located outside of the SDNP although the order limits, including areas of above ground plant are within close proximity to the boundary and will impact on the setting of the SDNP.

1.2 In preparing this document the SDNPA have had regard to the purpose of LIRs as set out in Section 60(3) of the Planning Act 2008 (as amended) and the guidance given in the Planning Inspectorate's Advice Note One: *Local Impact Reports,* published in 2012. The SDNPA are aware that, as set out in this Advice Note, a LIR should not seek to balance or weigh the impacts upon the National Park but should clearly set out positive, neutral and negative impacts.

1.3 This LIR's main purpose is to identify Local Plan policies relevant to the proposed development and the extent to which the proposed development accords, or does not accord, with these policies, articles, requirements and obligations. This report does this under topic based headings addressing the impacts of the scheme, identifying key issues for the local community and the SDNPA followed by providing commentary on the extent to which the proposed Development Consent Order (DCO) addresses these issues.

2. Site Description

2.1 The application site is wide, ranging from urban areas around Havant through the countryside as well as skirting around rural settlements before finalising within Otterburne within the Winchester administrative area. As mentioned above the proposed routing avoids the SDNP however the site sits closely to the boundary of the Park and therefore is within the setting.

3. The Proposal

3.1 The applicant's Environmental Statement, at chapter 3, details the proposal. Key points considered to be of particular relevance to the National Park are set out below.

3.2 The proposal includes a number of above ground plant (AGP) areas, specifically at Portsdown Hill, Wickham, Welbourne and Durley that would be within the setting of the National Park. These will be permanent structures within the setting of the SDNP and therefore it is vital that the Park have a voice within the detailed design of these buildings and structures.

3.3 The Proposal includes a new pipeline using predominantly trench cutting techniques that would disrupt the existing landscape features within the setting of the SDNP.

3.4 Temporary impacts from construction works are also included within the proposal

which would result in lighting, tranquillity and highways impacts.

3.5 As such it is vital that the Park have a voice within the LEMPs, CEMPs, relevant CTMP and Biodiversity Gain Plan(s).

4. The South Downs National Park

Designation of the South Downs National Park (SDNP)

4.1 The South Downs National Park was established as a National Park in 2010 and the SDNPA became the Planning Authority for the National Park on 1 April 2011. The South Downs National Park contains over 1,600 sq km of England's most iconic and valued lowland landscapes, stretching from Winchester in the west to Eastbourne in the east.

4.2 The South Downs National Park is a living, working and ever-changing landscape, shaped by its underlying geology and its human history. It has many special qualities which together define its sense of place and attract people to live and work in the area and visit the National Park. The Park was designated for having seven special qualities:

- Diverse, inspirational landscapes and breathtaking views;
- A rich variety of wildlife and habitats including rare and internationally important species;
- Tranquil and unspoilt places;
- An environment shaped by centuries of farming and embracing new enterprise;
- Great opportunities for recreational activities and learning experiences;
- Well-conserved historical features and a rich cultural heritage; and
- Distinctive towns and villages, and communities with real pride in their area.

Statutory Purposes and Duty

4.3 The National Parks and Access to Countryside Act 1949, as amended by the Environment Act 1995, sets the following statutory purposes and duty for National Parks:

1. To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and
2. To promote opportunities for the understanding and enjoyment of the special qualities of the Park by the public.

4.4 The SDNPA also has a duty when carrying out these statutory purposes:

> To seek to foster the economic and social well-being of the local communities within the National Park

4.5 Section 245 of the Levelling-Up and Regeneration Act 2023 (S245 duty) amends and strengthens the Section 11A (2) duty of the National Parks and Access to the Countryside Act 1949 upon relevant authorities, which includes the National Park Authority itself, to 'seek to further the specified purposes of Protected Landscapes'.

4.6 The Government's 'Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes', published 16 December 2024, sets out that this duty is active not passive and that, as far as is reasonably practicable, 'relevant authorities should seek to avoid harm and contribute to

the conservation and enhancement of the natural beauty, special qualities, and key characteristics of Protected Landscapes.'

4.7 Where there is an irreconcilable conflict between the statutory purposes, statute (Section 11A(2) of the 1949 Act (inserted by section 62 of the 1995 Act)) requires any relevant authority, when exercising or performing functions which relate to or affect land in a National Park, to attach greater weight to the purpose of 'conserving and enhancing' if it appears that there is a conflict between the two National Park purposes. Giving priority to the first purpose of the National Park is known as the *Sandford Principle.*

Highest Status of Protection

4.8 National Parks have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty (National Policy Statement for Water Resource Infrastructure 2025), paragraph 4.9.11.

4.9 NPPF, 2026 policy N4 states that '*Substantial weight should be placed on the importance of conserving and enhancing the natural beauty of these areas, and to conserving and enhancing wildlife and cultural heritage in National Parks'* and goes on to say, '*Development proposals within the setting of Protected Landscapes should be sensitively located and designed to avoid or minimise adverse impacts on the Protected Landscape*.'

4.10 The National Policy Statement for Water Resource Infrastructure 2025, states at paragraph 4.9.11 that Great weight should be given to conservation and enhancement of natural beauty in nationally designated landscapes, such as National Parks. Paragraph 4.9.14 also states that when considering applications for projects outside the boundaries of these areas which may have impacts within them and states that the aim should be to avoid compromising the purposes of the designation and that development proposals should be designed sensitively given the various siting, operational and other relevant constraints.

English National Parks and the Broads: UK Government Vision and Circular 2010

4.11 This DEFRA Circular sets out a vision for the English National Parks for 2030 and guidance on the key statutory duties of the National Park Authorities and how they should be taken forward, together with the contributions needed from others. The Circular recognises that whilst the lead role in the achievement of National Park purposes rests with National Park Authorities, the active support and co-operation of all Government and public bodies and statutory undertakers whose activities affect the Parks is also vital to the achievement of Park purposes. The Circular notes that many of these will be 'relevant authorities' with obligations under section 11A of the 1949 Act to have regard to the relevant Park purposes when coming to decisions or carrying out their activities relating to or affecting land within the Parks. The Circular states that the Government expects those bodies affected to give due weight to their obligations under this legislation.

Special Qualities

4.12 A crucial starting point for managing change in the future is capturing the essence of what makes the National Park important now – its special qualities. Every National Park has developed a list of the things that make it special, both as a baseline for measuring changes over time and to hold the National Park Authority - and its partners - to account for their contributions to its future. Documenting the Park's special qualities is required by paragraph 21 of the *English National Parks and the*

Broads: UK Government Vision and Circular 2010.

4.13 The 7 special qualities of the South Downs National Park are given below in Figure One. The special qualities do not sit in isolation, rather, they are interconnected and mutually reinforcing. Landscape is the key to all of the other special qualities and is therefore shown at the centre of Figure One. In SDNPA's view the aim behind National Park designation must be to conserve and enhance all seven special qualities together.



Figure One – The Special Qualities of the South Downs National Park

5. South Downs Local Plan and Other Relevant Local Policy

South Downs Local Plan

5.1 The SDNPA is the Local Planning Authority for the National Park and the statutory development plan for the National Park is the South Downs Local Plan. This was adopted in July 2019 and sets out how the SDNPA will manage development to 2033. This Local Plan is the first to plan for the South Downs National Park as a single entity.

5.2 Regulation 19 Local Plan

The new South Downs Local Plan will replace the existing Local Plan once it is adopted in 2027. The Proposed Submission version was approved by the National Park Authority in March 2026, and the Regulation 19 consultation has now completed prior to submission for examination. Currently, the new South Downs Local Plan carries some limited weight in decision making. As it progresses through the adoption process, it will gain more weight for the purposes of decision making. Where relevant, particular policies that are pertinent will be referred to.

5.3 Minerals and Waste Plan

5.4 Hampshire Minerals and Waste plan 2026
Policy 1 – Sustainable minerals and waste development
Policy 2 – Climate change – mitigation and adaptation
Policy 3 - Protection of Habitats and species
Policy 4 – Nationally protected landscapes
Policy 7 – Conserving the historic environment and heritage assets
Policy 8 – Water management
Policy 11 – Protecting public health, safety, amenity and well-being
Policy 12 – flood risk and prevention
Policy 13 – Managing traffic

Other Relevant Local Policy

5.5 The South Downs Partnership Management Plan 2026-2031

The South Downs Partnership Management Plan 2026-2031 sets out a Vision, aims / objectives and how we will deliver those aims for the National Park over the next five years. The relevant 'planning principles' are considered the most pertinent to this project:

Planning Principle 1	landscape-led development and design principles.
Planning Principle 2	Protect and enhance designated sites, ancient woodland and veteran trees.
Planning Principle 3	Biodiversity net gain.
Planning Principle 5	Achieving net zero operational carbon and minimising embodied whole life carbon
Planning Principle 6	Catchment based approach to water and wastewater management
Planning Principle 7	Water efficiency measures and more sustainable patterns of water use.
Planning Principle 8	Delivery of necessary facilities and infrastructure
Planning Principle 10	Protect and enhance Dark Night Skies and tranquillity
Planning Principle 11	Conserving and enhancing heritage assets
Planning Principle 13	Visitor experiences that benefit our communities
Planning Principle 14	Enhance social and economic well being

South Downs Integrated Landscape Character Assessment

5.6 The South Downs Integrated Landscape Character Assessment (SDILCA) was last updated in 2020. It is an aid to decision making, helping us to understand the landscape, what is important and special about it, and how it may change in the future. As a document it is intended to guide change and development so that it does not damage the characteristics or value of the landscape. It also helps us to identify ways that we can maintain and improve the character of a place. SDNPA uses the SDILCA to help understand the landscape character of the National Park and ensure that development proposals conserve and enhance landscape character within the National Park.

Supplementary Planning Documents

5.7 The SDNPA has no Supplementary Planning Documents that relate to this Nationally Significant Infrastructure Project.

Technical Advice Note: Dark Skies (2021)

5.8 The South Downs National Park is an International Dark Sky Reserve, designated in May 2016. This technical advice note sets out guidance on the SDNPA's approach to

lighting design and the protection and enhancement of dark skies. Its aim is to provide developers and planners with the necessary information to submit and assess lighting schemes which are appropriate to the landscape.

6. Planning Issues and Relevant Policies and Guidance

6.1 As stated above the development proposal is not within the National Park, but adjacent to it. In this section planning considerations are covered where there is, or where there is the potential to be, impacts on the National Park or its residents. Planning considerations with a largely site specific focus (such as contamination, waste management and archaeology) are not covered as these will be picked up by the host local planning authorities.

Principle

6.2 The South Downs National Park Authority (SDNPA) recognises the need to reduce abstraction from threatened chalk streams in the locality which provide a valuable and irreplaceable resource for nature and communities in the south of England. The method of doing so needs to be undertaken in a manner that does not result in harm to this nationally important landscape, which is given the highest level of protection, the biodiversity and access it contains. The applicant also has a duty under section 245 (Protected Landscapes) of the Levelling-up and Regeneration Act 2023, to seek to further the purposes of the National Park. Throughout the pre-application stage, the applicant has worked with the SDNPA to identify where there is potential for adverse effects on the SDNP and to set out steps to avoid or mitigate for this harm. The principles regarding these steps have been broadly agreed and our interest going forward is in ensuring that such matters are given appropriate consideration and secured with sufficient detail in order to deliver proportionate and characteristic mitigation.

Landscape

6.3 South Downs Local Plan Policy SD1 explains that planning permission will be refused where development proposals fail to conserve the landscape or natural beauty of the National Park, unless, exceptionally, the benefits of the proposal demonstrably outweigh the great weight to be attached to these interests. Policy SD4 states that development proposals will only be permitted where they conserve and enhance landscape character by demonstrating that, for example, proposals are informed by that landscape character, reflecting the context and type of landscape in which the development is located. The design, layout and scale of proposals should conserve and enhance existing landscape character features which contribute to the distinctive character, pattern and evolution of the landscape.

6.4 Local Plan Policy SD5 requires a landscape led approach to design that makes a positive contribution to the overall character and appearance of the area. Local Plan Policy SD42 states that development proposals for new or improved infrastructure will only be permitted where the design minimises the impact on the natural beauty, wildlife and cultural heritage of the National Park.

6.5 The SDNPA welcome the removal of the pipeline from within the Park's boundary and acknowledge the efforts made to minimalise the direct impacts through route selection.

6.6 Notwithstanding this, parts of the Project remain within the setting of the SDNP and several components, particularly BPT-K (Break Pressure Tank (BPT)), IPS-G (Intermediate Pumping Station) and associated construction activities, have the potential to affect landscape character, visual amenity, tranquillity, dark night skies and the experience of users of the National Park, though it should be appreciated

that all the above ground plant along Works no 4 have the potential to adversely impact the setting of the National Park. The Environmental Statement identifies temporary construction effects on parts of the National Park and its setting, together with residual visual effects in relation to sections of the Pilgrims' Way and other elevated viewpoints.

6.7 The Authority notes that the Landscape and Visual Impact Assessment (LVIA) identifies effects upon the setting of the National Park. It is noted that Appendix 13.2 of the ES (Landscape and visual impact assessment methodology) identifies that the geographical extent of the setting of Protected landscapes, such as the SDNP, are not defined in policy or maps, clarifying that the setting is not a designation or a receptor in its own right. This assessment echoes technical Guidance from the Landscape Institute (TGN 24) Therefore, while previous concerns have been raised in regard to how the applicant has defined the setting of the National Park it is considered that the methodology is consistent with nationally accepted guidance.

6.8 Previous concerns raised regarding the importance of landscape character remain, in regard to the key guiding principles of the OLEMP and Design Principals. The Authority is concerned that some mitigation proposals appear formulaic and risk introducing landscape features that may not be characteristic of their local context.

6.9 Therefore, while the SDNP welcome the inclusion of consultation with the Park being secured within requirements 3 and 4 of the draft DCO however, it is requested to extend this consultation to cover Works Nos 4 and 5A as well as 5B, C and D.

6.10 In providing these changes it is considered that the requirements under S245 of the LURA could be progressed.

Biodiversity Net Gain (BNG)

6.11 The SDNPA defers to Natural England, as the Government's advisor for the natural environment, and the host local planning authorities on the biodiversity impacts of the proposed scheme. However, in terms of impacts on the ecology of the National Park, there are no issues of significance identified.

6.12 Policy SD2 requires that development protect and provide better and joined up natural habitats, while policy SD9 requires proposals to conserve and enhance biodiversity.

6.13 Policy SD11 looks specifically at trees, woodland and hedgerows requiring that development seek to conserve and enhance in the first instance, and where protected trees and important hedgerows cannot be

6.14 The SDNPA are supportive of the applicant's commitment to securing BNG despite no requirement at present for this to be secured through the DCO process.

6.15 However, there are concerns regarding aspects of the proposed habitat management approach, including:

- Certain grassland establishment methodologies;
- Woodland design approaches;
- Planting densities and spacing arrangements; and
- Whether proposed habitats reflect local landscape character.

6.16 The Authority will therefore continue to review the Biodiversity Gain Plan and associated management documents in detail to ensure that landscape, ecological and National Park objectives are aligned and deliverable. The National Park welcome

requirement 5 to secure the ongoing Biodiversity enhancements and request that this requirement is updated to allow for the SDNP to be a consultee to the Biodiversity Gain Plans along Works No. 4 and at Works Nos. 5A, 5B, 5C and 5D to ensure that landscape, ecological and National Park objectives are aligned with the provisions within the forthcoming Biodiversity Gain Plan(s).

6.17 In providing these changes it is considered that the requirements under S245 of the LURA could be progressed.

Highways

6.18 The SDNPA notes that Hampshire County Council, as Highways Authority, will be making representations regarding the highways impacts of the proposed pipeline through the examination process. The SDNPA wishes to make brief comments at this stage:

i) The SDNPA is generally content with the construction traffic routing strategy put forward in the Framework Construction Traffic Management Plan (examination reference 7.2). However, the SDNP, have concerns regarding the level of traffic that would be passing through the village of Twyford. This is because tranquillity is one of the special qualities of the South Downs National Park. Discussions with Southern Water are ongoing at this stage.

ii) The SDNPA supports the inclusion of proposed DCO Requirement number 8 that requires the submission and approval of a Construction Traffic Management Plan. The SDNPA does, however, respectfully request that this document be submitted to and approved by the relevant Local Planning Authority, as well as the relevant Highway Authority in consultation with the SDNPA (specifically in regard to access routing for construction compounds L1-L10). Construction Traffic Management Plans give rise to local planning considerations (such as tranquillity and impacts on residents) and Local Planning Authorities are best placed and used to handling such documents, not least because they are ordinarily determined by them.

Dark Night Skies

6.19 The South Downs National Park is an International Dark Sky Reserve, designated in May 2016. The quality of dark night skies is also influenced by what takes place beyond the National Park boundary. The SDNPA has worked with many Local Authorities to try to reduce light pollution in locations surrounding the National Park.

6.20 Within the South Downs National Park planning policies are in place that seek to conserve and enhance the intrinsic quality of dark night skies. Local Plan Policy SD8 states that development proposals will be permitted where they conserve and enhance the intrinsic quality of dark night skies. It also requires that development proposals must demonstrate that all opportunities to reduce light pollution have been taken and that the measured and observed sky quality in the surrounding area is not negatively affected, having due regard to the following hierarchy:

a) That the installation of lighting is avoided; and

b) If lighting cannot be avoided, it is demonstrated to be necessary and appropriate, for its intended purpose or use:

   i) Any adverse impacts are avoided; or

   ii) If that is not achievable, then adverse impacts are mitigated to the greatest reasonable extent.

6.21 Whilst permanent lighting is proposed as part of the scheme the applicant has explained that this will only be used in exceptional circumstances as a result of security needs or for unplanned maintenance with the details secured within the draft DCO. Both the construction and operational lighting has the potential, unless appropriately mitigated, to harm Dark Night Skies and the SDNPA.

6.22 The SDNPA welcomes proposed design principal GDP_6 which controls permanent external lighting. Proposed DCO Requirement 3(4) is welcomed, securing consultation with the SDNP in relation to key above ground infrastructure. However, impacts can also be temporary. The provisions within the outline CEMP (document 7.1) and requirement 6 of the draft DCO are welcomed, but it is recommended that the requirements are updated to ensure the SDNP is consulted on final versions. This would enable the SDNPA to review and comment on both construction and operational lighting to ensure that it does not harm Dark Night Skies.

Tranquillity

6.23 Local Plan Policy SD7 states that development proposals in the National Park will only be permitted where they conserve and enhance relative tranquillity.

6.24 Tranquillity is considered to be a state of calm and quietude and is associated with a feeling of peace. It relates to quality of life, and there is good scientific evidence that it also helps to promote health and well-being. It is a perceptual quality of the landscape, and is influenced by things that people can both see and hear in the landscape around them. It is one of the National Park's special qualities.

6.25 The South Downs National Park Tranquillity Study (2017) sets out relative tranquillity across the National Park. It is understood that this document was consulted in the creation of chapter 13 of the ES (landscape and visual). This chapter also recognises a temporary significant adverse effect during construction.

6.26 This will be in the form of movement of plant and vehicles, the presence of a construction compounds and temporary fencing and from stockpiled soils and materials. It is acknowledged that this harm would be temporary but it is considered contrary to the requirements of Local Plan Policy SD7.

6.27 The SDNPA welcomes proposed DCO requirement 13 that requires submission of an Operational Environmental Management Plan. This will be important to ensure that the ongoing operation of the proposed development is not audible within the National Park.

Residential Amenity

6.28 During construction it is inevitable that the works will give rise to localised disturbance to amenity. This needs to be considered carefully, including any potential impacts on the residents of Twyford where the routing for works relating to construction compounds L1-L10 will take place. With approximately 56 HGV vehicle movements per day during construction. In this respect, and as noted in the paragraph above, the SDNPA welcomes proposed DCO requirements 6 and 8 that requires submission of a CTMP and CEMP.

Socio-economic

6.29 The SDNPA has a statutory duty to "foster the economic and social well-being of communities living within the National Park".

6.30 With regards to tourism businesses it is difficult to assess the impacts that the loss of visual amenity and tranquillity during construction and operation of the pipeline and above ground plant will have. Overall, the impact is considered to be negative, but it is acknowledged that given the area of the National Park effected (in the

context of the size and offering of the overall National Park) the effect on tourism will not be significant.

6.31 Outside of tourism the socio-economic impacts of the scheme are also considered to be limited and the Authority raises no objection in this regard.

SDNPA Comments on the draft Development Consent Order (examination reference 3.1)

6.32 Comments on the proposed DCO Requirements (Schedule 2 of the DCO) have been made under the topic specific headings above. However, the SDNPA also wishes to make the following observations. The remarks are set out in table format for ease of reference.

Section / Article	Page	Detail	Comment / Query
Schedule 2 Part 2 clause 21	55	Gives Local Planning Authorities (or Local Highways Authorities as appropriate) 42 days (6 weeks) to notify the applicant of its decision.	It is considered that all such references should be changed to 40 **working** days (8 weeks), as of course is the general situation with the discharge of planning conditions in England. This comment is particularly important to those where the details may have an impact on the setting of the National Park. It is our view that 42 days is insufficient in any case, but particularly as it does not allow the time, where needed, for the relevant Local Planning Authority to consult SDNPA and for us to review and formulate a response. Alternatively, a change in wording to reflect the requirements of Article 27 of the Development Procedure Order would be acceptable.
Schedule 2 Part 2 requirement 3 (4)	50	Requirement to consult the SDNPA on design details of above ground plant	This requirement secures consultation with the SDNPA for Above Ground Plant works at Wickham, Portsdown and Durley (Works nos. 5B, 5C and 5D) however the works related to Works no 5A relate to above ground plant at Welbourne would also be within the setting of the National Park and therefore the National Park would respectfully request that we are also consulted on the design details for Works No. 5A. It is not clear whether the current wording of this requirement would allow the SDNPA to make comments on the ancillary works detailed on page 47 of the draft DCO. It is requested that the draft DCO is updated to reflect that the ancillary works

			are also subject to consultation as they include references to lighting, boundary treatments, and above ground structures/buildings.
Schedule 2 Part 1 requirement 4	50	Sets out the requirements for the submission of a Landscape and Ecology Management plan	This article (at 4(3)) restricts the SDNPA involvement to works numbers 5B, 5C and 5D. However, the whole of the site proposal is within the setting of the SDNP and the loss of trees and hedges is a key consideration. As such the National Park would respectfully request that we are consulted for the LEMP along the whole length of the pipeline (identified in the draft DCO as Works no.4) as well as works numbers 5B, 5C and 5D.
Schedule 2 Part 1 requirement 5	51	Sets out the requirements for the submission of an updated Biodiversity Gain Plan	This article sets out the requirement to submit an updated BGP to relevant Authorities with and updated BNG metric. As this would impact the setting of the National Park in regard to species planting The SDNP respectfully request that Requirement 5 (1) in updated to read '*No part of the authorised development is to commence until a detailed biodiversity gain plan for that part has been submitted to and approved in writing by the relevant planning authority, in consultation with the South Downs National Park'*
Schedule 2 Part 1 requirement 6	52	Sets out the requirement for an updated CEMP.	This requirement sets out that an updated CEMP is submitted to relevant Authorities before commencement. While the SDNP is not a Relevant Authority the CEMP would secure details of lighting that would impact the setting of the SDNP and the Dark Skies areas within it. As such it is respectfully requested that the SDNP is included within this requirement as a consultee for areas within Works nos. 4, 5 (A-D) and 6. It is not clear whether the current wording of this requirement would allow comments on the ancillary works detailed on page 47/48 of the draft DCO. It is requested that the draft DCO is updated to reflect that the ancillary works are also subject to consultation as they include references to lighting.
Schedule 2 Part 1 requirement 8	52	Sets out the requirement for an updated CTMP	This requirement sets out that an updated CTMP be submitted to relevant authorities. It is noted that Local Highways Authorities and National Highways have been secured. However, the SDNPA have concerns relating to the use of construction routing

			through Twyford which is within the National Park. This is subject to ongoing discussion with Southern Water. However, it is respectfully requested that this requirement is updated to allow consultation with the SDNP in regards to construction compounds L1-L10 as shown on sheets 23-25 of the works plans (document ref 2.3).