# Cllr Liam Bailey-Morgan Written Representation – Compound L-10

**Application by Southern Water Services Limited for an order granting development consent for the Hampshire Water Transfer and Water Recycling Project (WA010002)**

**Submitted by:** Councillor Liam Bailey-Morgan, Winchester City Council (Colden Common and Twyford ward). This written representation supplements my oral submission at the Open Floor Hearing on Wednesday 11 November 2026.

## Summary

Compound L-10 should not be fixed in the Order on the evidence the Applicant has provided. This representation concerns the compound on the fields east of Highbridge Road (B3335) and behind Wardle Road, Brambridge. It summarises and expands on my oral submission at Open Floor Hearing 1. In brief:

- The Applicant has not adequately assessed reasonable alternative locations. Highbridge Community Farm, south of Wardle Road, has a willing landowner and should be assessed fully.
- The fields are long-established grazing land occupied for over 20 years by the Potts family, whose elderly horses could not realistically be relocated.
- The compound takes the whole field, and its size, duration and out-of-hours working are not controlled in the draft Order.
- Flood risk on Highbridge Road, historic landfill on the site and effects on the River Itchen Special Area of Conservation (SAC) have not been assessed site-specifically.
- Winchester City Council's support for L-10 in the draft Statement of Common Ground was reached before affected residents or their ward councillors knew of the proposal, we expect this to be updated based on residents input.

I ask the Examining Authority to require the Applicant to carry out and publish a proper assessment of alternatives, flood risk and ground conditions before the location of the compound is fixed, and to secure firm limits on the compound in the Order.

## 1. Introduction

1.1 I am a Winchester City Councillor for Colden Common and Twyford. Together with Councillor Sue Cook, I represent the residents of Wardle Road, Lordswood and Highbridge Road, whose homes lie beside the proposed Compound L-10, one of the largest compounds on the route.

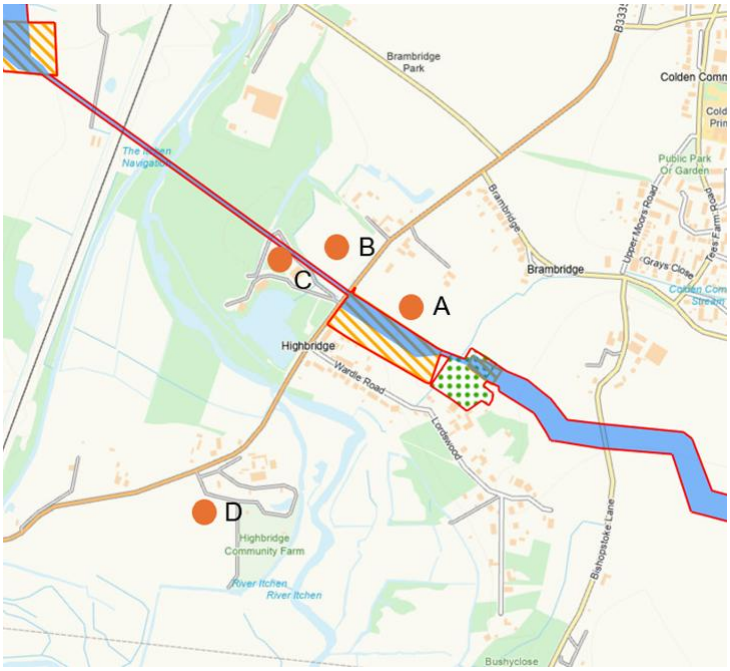
1.2 Councillor Cook and I facilitated the site visit with the Applicant on 13 October 2026. As far as residents are aware, it was the first direct engagement by the Applicant with the community about the use of these fields for compound L-10. Its report following the visit largely repeats the application documents and, in residents' view, raises more questions than it answers.

1.3 I fully support the residents' Written Representation and its summary of information requested. I do not repeat its detail here. Instead I set out the points I consider most important for the Examining Authority, using the Applicant's paragraph numbering where helpful.

## 2. Assessment of alternative locations for Compound L-10

2.1 We do not consider that the Applicant has carried out an adequate assessment of reasonable alternative locations for Compound L-10. The Environmental Statement should describe the reasonable alternatives that were studied and explain why this site was chosen, including a comparison of environmental effects. We have also seen no evidence that the Applicant has properly considered other sites that could significantly reduce the impact on residents.

2.2 In particular, as set out in the formal representation of William James Russel, the landowner of Highbridge Community Farm (his brother), south of Wardle Road (Location D on the map below), has indicated a willingness to make that land available for all or a significant part of the compound. This is a genuine and available option. We ask that the Applicant be required to assess it fully, alongside other reasonable alternatives to the proposed location of the tunnelling compound and associated works at L-10, including tunneling from the other direction, and to publish that assessment before the compound's location is fixed.




2.3 It should not be the responsibility of residents, or of their ward councillors, to identify alternative sites for the Applicant. Residents learned of the compound only weeks before the examination began, and have had to research and put forward options themselves. The duty to identify and properly investigate reasonable alternatives rests with the Applicant. That work should aim to find the location that does least harm to the environment and causes least disruption to residents' lives.

2.4 The Applicant has not yet done this. Its only account of alternatives is a short section of its October 2026 report, produced after the site visit in response to residents' questions. It does not compare any option on distance from homes, noise, lighting, traffic, flood risk or duration. The residents' Written Representation sets out why the reasons given there do not stand up.

## 3. Current use of the land identified for Compound L-10

3.1 The L-10 fields are not vacant land. As set out in the representation of Mr S and Mrs J A Potts (21 August 2026), the Potts family have rented, occupied and managed them as grazing land, with the landowner's consent, for over 20 years. Their home is next to the fields and they reach them directly from it. They bought the house in 2004 to be near their horses.

3.2 A number of horses live on the land. Three were born at Highbridge and have grazed only these fields. By the proposed start in 2028, the oldest will be 28 and the next 25. Relocating horses of this age for the length of major construction works is neither humane nor realistic. The family has said that, in the worst case, they could face having elderly horses put down solely because of the choice of this land.

3.3 The family accommodated repeated survey access over three years without being told the fields would become a construction compound. They report survey staff entering without consent, damaging gates and leaving gates open to the highway while horses were grazing.

3.4 The Potts family estimate that the pipeline itself needs access to only about a quarter of the land. Waterlogging, hardstanding and years of compound use put the fields' return to safe grazing at risk long after construction ends. The Applicant has not assessed the effects on the family or on the welfare of their horses, and must do so before this land is chosen.

## 4. Size, duration and working hours of the compound

4.1 **Size.** The proposed compound takes up the whole field. It would be quite a coincidence if construction needed exactly that much space, and no answer was given when residents asked this at the site visit. The Applicant has not shown how much land the shaft needs, as opposed to storage, parking, offices and welfare facilities. Paragraph 2.1.5 says the shaft could move further west, closer to Highbridge Road and to homes, with its position fixed only at detailed design. The Order Limits should be reduced to the area genuinely required, and the likely shaft position confirmed now.

4.2 **Duration.** Paragraph 2.3.2 says works at L-10 are "currently expected" to last 17 months, within an overall programme of about five years from 2028 (paragraph 2.3.1). As a hub compound, L-10 could be needed for longer than its own section of works, and tunnelling projects often overrun. As far as I can see the draft Order sets no maximum period. If the Applicant is confident of 17 months, including preparation and reinstatement, the Order should be limited accordingly.

4.3 **Working hours.** Paragraph 2.2.2 allows work outside standard hours, overnight, on Sundays and on bank holidays, including for tunnelling, subject only to notifying the local planning authority. At a tunnel launch compound, out-of-hours working should be treated as likely, not exceptional. The Applicant should state the maximum out-of-hours working proposed at L-10 and the noise and lighting controls that will apply.

4.4 **Traffic.** Table 1 of the report shows an average of 119 light and 19 heavy goods vehicle two-way trips a day, peaking at 260 and 75 a day for four months. These figures cover the 17-month construction phase only, not the compound's wider use as a hub or any overrun. Highbridge Road has the national speed limit and a second industrial access nearby, so a single traffic marshal is not adequate. A compound-specific traffic assessment is needed.

## 5. Flood risk, ground conditions and the River Itchen

5.1 **Flood risk.** Highbridge Road floods regularly in moderate to heavy rain, not only in exceptional weather, as residents' photographs show. The compound field waterlogs, residents believe a spring runs beneath it, and hardstanding would add run-off onto the road and potentially into homes. The Applicant has not provided a drainage design or a flood risk assessment for L-10. Drainage mitigation must be in place before the compound is used.

5.2 **Contamination.** The Applicant's own plans identify infilled former marshland on the site that may contain fill of unknown material, and the landowner has confirmed unregulated landfill there in the 1960s and 1970s. From L-10 the tunnel would run beneath the River Itchen towards Otterbourne, close to the historic landfill at Bugle Farm, an unlined, infilled gravel pit of unknown waste within the works boundary. The Applicant says the tunnel would sit deep in clay below the waste. But the shafts must be dug through the shallow wet ground, and the Applicant acknowledges that gas monitoring has not been carried out near the landfill. I have seen no contaminated land assessment for L-10.

5.3 **The River Itchen SAC.** Tunnelling under the river reduces the impact on it, but does not remove it (paragraph 2.1.2). Run-off from the compound could reach the Itchen through the watercourse on its eastern edge, upstream of sensitive fish breeding grounds. The Itchen has the highest level of protection, so the burden is on the Applicant to show that the works will not harm its ecology. I do not believe it has assessed the risk of excavating near unlined waste, in wet ground, beside the SAC.

## 6. Consultation

6.1 I support the points made by Councillor Cook at Open Floor Hearing 1. Paragraphs 4.4.2 and 4.4.3 of the report confirm that in 2022 letters went only to residents within about 500 metres of the pipeline corridors, and in 2024 additionally only to landowners within the draft Order Limits. Others were reached by leaflets, posters, notices and social media. **Crucially. no resident next to L-10 received any direct communication about the compound, and Councillor Cook and I, as ward councillors, learned of it only in late September 2026.**

6.2 Residents therefore had no meaningful opportunity to influence the choice of location before the application was made. That makes a proper assessment of alternatives during this examination all the more important.

## 7. Winchester City Council's Statement of Common Ground and Local Impact Report

7.1 Winchester City Council's Relevant Representation originally raised no specific objection to L-10, subject to appropriate mitigation. The draft Statement of Common Ground records support for L-10 in reliance on the Outline Construction Environmental Management Plan.

7.2 That position was reached before the households next to the site, or we as their ward councillors, knew the compound was planned here. The Statement of Common Ground is a live document and has not been finalised.

7.3 Councillor Cook and I are pressing the Council not to support L-10 in its current location. We have asked that the concerns in this representation and in the residents' Written Representation are reflected in both:

- **The final Statement of Common Ground** between the Applicant and the Council. It should record L-10 as not agreed until a proper assessment of alternatives, flood risk and ground conditions has been carried out. As the local planning authority that would receive notice of out-of-hours working under paragraph 2.2.2, the Council should also seek a power to approve or refuse such working, not merely be notified.
- **The Council's Local Impact Report.** It should set out the local effects of L-10 on residents of Wardle Road, Lordswood and Highbridge Road: noise, lighting, traffic and road safety, working hours, duration, flood risk, contamination, loss of amenity, and the loss of the Potts family's long-established grazing land and its effect on their horses. It should also set out the case for alternatives, including Highbridge Community Farm.

7.4 Until then, I ask the Examining Authority not to treat the Council's current position on L-10 as settled.

## 8. Requests to the Examining Authority

8.1 I respectfully ask the Examining Authority to require the Applicant to:

1. **Provide a side-by-side comparison of compound options**, judged on the effects on residents as well as the environment. It should include a full assessment of Highbridge Community Farm, alongside the other reasonable alternatives the Applicant itself identifies, with the aim of minimising harm to the environment and disruption to residents' lives. It should be published before the compound's location is fixed.
2. **Justify the size of the compound**, show the land needed for the shaft as distinct from ancillary uses, confirm the shaft position, and reduce the Order Limits accordingly.
3. **Assess the effects on the Potts family and the welfare of their horses**, and on their long-established grazing use of the fields, before the compound location is fixed. If any works remain on the land, enforceable reinstatement and aftercare commitments are needed to return it to safe, well-drained grazing.
4. **Provide a flood risk assessment and drainage design for L-10**, with mitigation in place before the compound is used.
5. **Provide a site-specific assessment of ground conditions** at L-10 and along the tunnel route. This should include borehole results, a contaminated land assessment of the infilled ground and former landfill on site, gas monitoring near the Bugle Farm landfill, the vertical separation between the tunnel and the waste, and the risk to groundwater and the River Itchen SAC.
6. **Provide a compound-specific traffic assessment**, including daily delivery patterns, routes, marshalling and road safety measures on Highbridge Road.

8.2 I also ask the Examining Authority to consider securing in the Order a maximum period for the use of Compound L-10, firm working hours, and reinstatement requirements, rather than

leaving these to the contractor. And I ask it to carry out an accompanied site visit to L-10 and the alternative sites, as requested by Councillor Cook.

8.3 The residents' position, which I fully support, is that the L-10 site should not be used in its current form. A whole field beside people's homes has been chosen without the alternatives being properly assessed. I ask that this work is done now, before the location is fixed in the Order.

Councillor Liam Bailey-Morgan Winchester City Council, Colden Common and Twyford ward

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