

Pipeline Shaft 1 – Reserved Matters Application

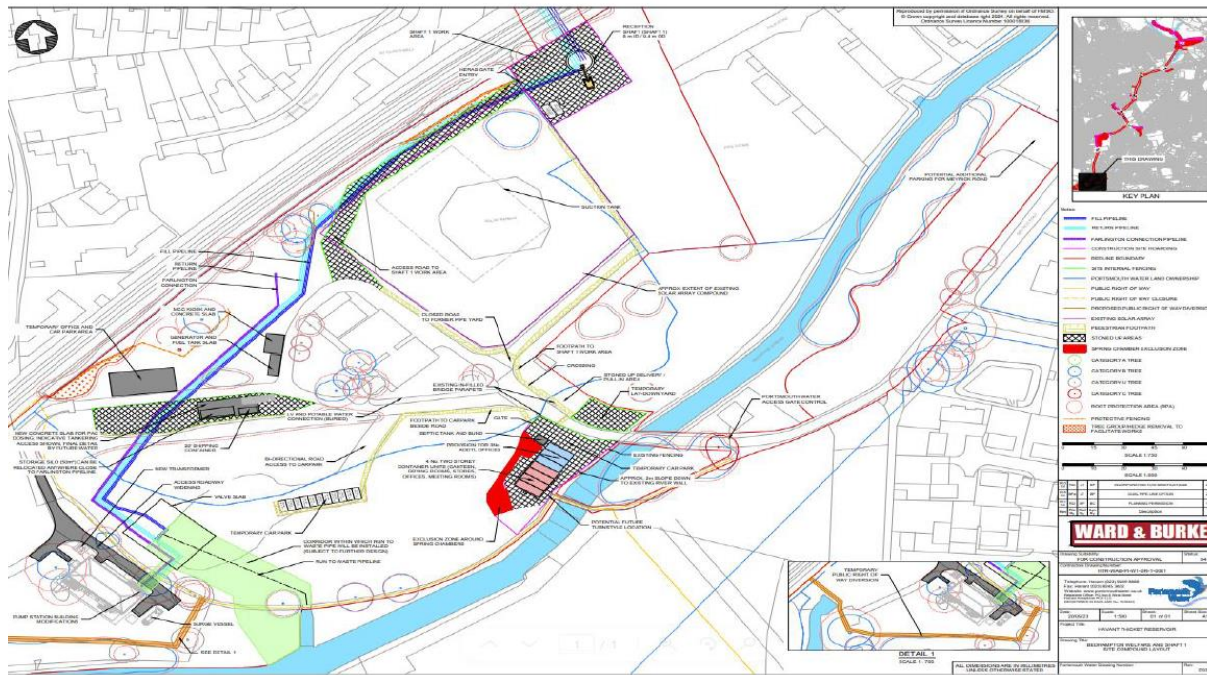
Shaft 1 application - Reference: APP/24/00204

Shaft 1 discharge of conditions – Reference: APP/20/00991

I have reviewed the information provided in relation to both of these applications and have highlighted below a number of concerns and questions. **Further information needs to be provided by the applicant to the LPA to enable a full evaluation of the impacts of this proposal, before the application is approved.**

1. Red line boundary does not cover all areas impacted by the Shaft 1 works

The red line plan for the Shaft 1 application does not appear to cover all of the areas which will be impacted by this application. Further areas to be used for laydown of waste, welfare accommodation, parking etc. are shown on Appendix 1 of the Construction Method Statement and on Figure 1 (page 9) of the Traffic Management Plan. The plan is copied below for ease of reference. These include additional areas which are closer to residential properties off Meyrick Road, plus an area immediately alongside the Hermitage Stream, which need to be considered in the context of the impact assessment.



The LPA should ask for a revised red line plan showing all the areas to be used in association with the Phase 1 shaft construction work.

2. Risk of groundwater impacts / flooding

Shaft 1 is shown on the submitted drawings to be 11m deep and is in very close proximity to the extensive Bedhampton Springs network. Surprisingly the Emergency Flood Plan does not consider the risk of groundwater flooding.

There is also no indication as to whether investigations in advance of the work have established if the groundwater in this area may be artesian and could rise to the surface during the works.

The LPA should ask for the flood risk assessment to be updated to include groundwater flooding, the impacts of groundwater coming to the surface, along with the methods to be adopted to control this risk.

The potential impacts of groundwater on construction works, methods and timescales also needs to be more carefully considered.

Note: In the Planning Statement groundwater is not mentioned in the text regarding water environment risks.

3. Environmental impacts that need to be considered more fully & addressed

a) Excavation of wet spoil from the shaft;

The application drawings show that the shaft is 11m deep and 9.4m wide. Excavation will generate a significant volume of waste in what is shown as a small compound. Given the proximity of the springs it is very likely that the spoil removed from the hole will be wet. The lay-down area within the current red line boundary is quite small and constrained, a second lay-down area is shown alongside the Hermitage Stream outside of the current red line (see map above). The Construction Method Statement makes reference to a muck skip. Page 11 states that 'excavated material to be stored in a lay down area until taken away by the waste contractor.'

- If waste is loaded onto lorries while still wet residues may leak out along local roads. Will fully sealed lorries be used?
- Will water be allowed to drain out before the waste is removed from site?
- If so, where will the water in the lay-down area(s) drain to?

The LPA need to obtain additional information on how wet waste arisings from the shaft will be handled and where? This is needed in order to be able to better understand and assess any associated impacts, especially to the Hermitage Stream.

b) Dealing with water and other liquids during construction, including groundwater

It is not clear if there are any surface water collection gullies or drains within or adjacent to the works area(s). It is likely that any surface water infrastructure present or run-off across the ground surface will drain to the nearby Hermitage Stream.

In addition to the risk already highlighted above from groundwater I note that the Construction Method Statement also makes reference to;

- A bentonite pumping machine (page 8)
- Mineral oil to be sprayed as a mist during construction (page 8)
- Walls of the shaft to be washed of any muck before installing external shutter and the cutting shoe being pressure washed (page 11)
- A concrete wash out being provided to safely wash all concrete lorries. This will be in the form of a skip to collect the water, followed by a water treatment facility, before discharging clean, treated water back into the nearest watercourse (page 12)

The Ecological Mitigation Compensation & Enhancement Measures Report indicated on page 8 that; The groundwater released from the construction of Shaft 1 will be directed firstly to a silt buster / settlement tank before entering an existing surface water sewer.

- Not clear on drawings submitted where the silt buster/ settlement tank is to be located?
- Is there to be just one silt buster? (chalk sediment can be slow to settle out)
- What happens if there is more g/water generated during construction than a single silt buster can accommodate?
- Not clear what surface water sewer the water will be discharged to? (presumably the SW sewer does to be used does discharge into the Hermitage Stream)

The CEMP, page 29, Section 5.8 refers to; During excavation works, pumped water will be directed to a settlement tank, lagoon area or to a filtration system prior to discharge dependent upon the location and size of the excavations (9.4m Diameter, 11.4m depth)". This is very vague. Given the risks and the proximity to a sensitive receptor (Hermitage Stream draining into the Langstone Harbour SPA/SAC) there should be a specific strategy for the Shaft 1 construction and areas designated for liquid/ water storage/ treatment should be identified on the plans. The discharge route for any water, treated or untreated, should be clearly set out.

The CEMP, Section 5.18 Drainage Management Plan states; A drainage management plan will be established in a separate document *for the main pipeline works*. This will include details of how excess surface water run-off from new hard standing areas such as access roads, car parks, and storage compounds will be managed to ensure there is no increased flood risk. Given the risks at the Shaft 1 construction site a Drainage Management Plan should be developed for this site.

The LPA need to obtain additional site specific information on how groundwater & liquid waste arisings from the shaft construction will be handled, where, and what monitoring will be in place? This is needed in order to be able to better understand and assess any associated impacts, especially to the Hermitage Stream and downstream SPA/SAC.

If a significant risk is identified to Langstone Harbour SPA/SAC then a Habitats Regulation Assessment will be required.

c) Traffic noise impacts exasperated by poor quality road surface

The surface of Meyrick Road is uneven and in places in poor condition. No reference is made to improving the road surface before construction vehicle movements commence, to reduce noise impacts for local residents, as proposed at the Pipeline Stakeholder Workshop. This will mean that the normal noise from traffic movements will be made worse by the uneven road surface, including impact type noise which is more disturbing. The construction Traffic Management Plan refers on page 14 "HGV movements will be restricted to 30 amount daily (15 arrivals, 15 departures). Meyrick Road is a pretty quiet residential street most of the time.

The LPA need to ascertain whether the applicant will be mitigating the noise impacts on this quiet street by repairing the road surface before Shaft 1 construction works commence?

Note: The CEMP page 29 refers to; "Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable". This should also apply to Meyrick Road.

d) Operational factors to be considered in the impact assessment

The shaft drawings make provision for both air valve and wash out chambers in the construction. Consideration needs to be given to the impact of these features, as this could impact whether this is an appropriate location for a shaft.

The LPA need to seek further information on the following;

- **Will the operation of the air valves be audible at the adjacent residential properties soon to be built? If so, how frequently may the air valves operate? Could the air valves operate at night? (Noting that the shaft is located very close to the new Bellway housing)**

- What will be the quality of the water emanating from the washouts?
- Where will the washout(s) discharge too, and how often?

It seems likely that the washout(s) will discharge to the nearby Hermitage Stream.

The LPA should establish;

- If the washout chamber located in Shaft 1 will discharge to the Hermitage Stream?
- Could this give rise to any concerns in terms of water quality or erosion?
- What about if effluent recycling were to go ahead?

4. Parking suspension on Meyrick Road & West Street

The Construction Traffic Management Plan on Page 12 indicated that on Meyrick Road, Ward and Burke will have a permit in place **to suspend all parking along one side of the road, and on West Street, a parking suspension will be in place on both sides of the junction with Meyrick Road entrance** to ensure that the swing radius will not be obstructed when turning into Meyrick Road. Page 13 indicated that “ Works to shaft 1 will begin in June 2024, and will take approximately 4 months to construct”.

The LPA should enquire as to;

- Is any provision for alternative residents parking to be provided?
- Will the parking suspension be in place for the whole 4 month period?
- Have residents been made aware so that they can identify any specific issues this might cause, for example, if there are disabled residents.

5. Delay to the provision and notification of relevant information

When the LPA or Portsmouth Water notify stakeholders/ members of the community who have previously made comments on the original reservoir or pipeline application it would be extremely helpful if you could make sure that you provide details/ links for both the main new reserved matters application(s), along with any details/ additional documents submitted to support the discharge of planning conditions, as the two things are intrinsically linked. Otherwise important information will be missed, as was the case for this application, since I have only just found out about the additional supporting information submitted in relation to discharge of conditions, which are material to my comments on the Shaft 1 Reserved Matters Application.

Other stakeholders and local residents may still be unaware of the additional information submitted in respect of discharging conditions. If they were aware of it more residents and stakeholders may have made comments.

Can the LPA confirm if posters were put up around the site, and in adjacent streets, to notify residents that additional information was available under planning application reference APP/20/00991?

6. Invasive species including Japanese knotweed

Japanese knotweed is a significant issue at the Bedhampton Springs site. I was pleased to note that a Bio-security Document had been prepared and submitted as a supporting document to the application for discharge of conditions. It is really important that the workers on the ground are carefully briefed about the risks and adequate supervision ensures risk mitigation measures to stop the spread of the plant are fully implemented on site.

7. Other comments

a) **Reuse of waste**; The CEMP page 19 refers to; 90% of site won material to be reused on site. It is not likely that the waste taken from the shaft during construction can be beneficially used on site.

b) **Ecological Mitigation/ Compensation**; The CEMP page 34 refers to an Ecological Mitigation, Compensation and Enhancement Measures being set out in a different document. It is disappointing that the separate report only refers to mitigation measures already proposed for the main reservoir development. No additional measures are proposed even though the report acknowledges on Page 9 that; “**Approximately 65 m2 of blackthorn scrub will be lost to facilitate the works. The scrub provides nesting and foraging opportunity for breeding birds**”

Given the direct loss of scrub habitat to facilitate this development it would be reasonable for the LPA to expect mitigation or compensation measures to offset the loss of scrub locally. Ideally this would comprise 100m² of scrub habitat enhancements in the Bedhampton Area, or funding to address problems with invasive species in the vicinity.