

Havant Thicket Reservoir

Non-Material Amendment to Section 73 Permission and Phase 3 Reserved Matters Approval

Statement of Conformity
with the Environmental
Statement

22/09/2025 | P01

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1 Introduction

Future Water commissioned Haskoning to prepare a Statement of Conformity with the Environmental Statement in support of applications for Non-Material Amendments (NMA) to the approved slope angles of the Western Embankment and Transition Zone of the Havant Thicket Reservoir (HTR) Scheme. The NMA applications propose amendments to the Section 73 Permission and Phase 3 Reserved Matters Approval (RMA).

The HTR Scheme was granted planning permission subject to conditions in October 2021, by Havant Borough Council (HBC) and East Hampshire District Council (EHDC), Planning Permission Refs: APP/20/00990 and 51680/001 respectively. The decision is for a hybrid application and includes full permission for some matters and outline permissions for others.

The applications which formed the subject of the hybrid consent were supported by an Environmental Statement (ES) (Havant Thicket Reservoir Project, Atkins, 2020) which reported the findings of the Environmental Impact Assessment (EIA).

Applications subsequently made under Section 73 of the Town and Country Planning Act (TCPA) to HBC and EHDC in 2024 proposed a number of amendments to the design of the main embankment and related infrastructure, Planning Permission Refs: APP/24/00312 and 51680/012 respectively. The Section 73 applications were supported by an ES Addendum (2024) which reported the findings of the EIA evaluating proposed amendments to the main reservoir embankment, control house, culvert and valve tower. Section 73 planning permission was granted on 6 December 2024.

Pursuant to the Section 73 planning permissions, RMAs for Phase 3 works comprising the Main (Southern) embankment were granted by HBC and EHDC on 20 December 2024, Planning Permission Refs: APP/24/00311 and 51680/011 respectively.

This Statement of Conformity with the Environmental Statement considers whether the proposed changes to the Western Embankment and Transition Zone are likely to give rise to any new or materially different effects to those identified in the 2020 ES and/or 2024 ES Addendum.

2 Description of Proposed Changes

2.1 Background

Following further detailed design and modelling, it has been identified that the engineering design of the Western Embankment of HTR needs to be amended to ensure the internal embankment slopes of the western embankment remain structurally stable in an emergency draw down event. As a result, associated changes to the Transition Zone to the Main (Southern) Embankment are also proposed.

During an emergency draw down event, it has been identified that due to the rate at which the reservoir will be drawn down, the saturated clay material above certain slope angles could become unstable due to the rate at which water is released from the saturated clay.

It has therefore been identified that there is a need to reduce the internal slope angles of the Western Embankment and associated changes to the Transition Zone to remove this risk.

2.2 Proposed Changes

Changes to the Western Embankment and Transition Zone are proposed which would:

- Reduce the angle of the internal slopes to remove the structural risk;
- Increase the angle of external slopes; and
- Amend the slope angle Transition Zone to tie in with the Main (Southern) Embankment.

The proposed changes are summarised in Table 1.

Table 1: Proposed changes to Western Embankment slope angles and Transition Zone

	Approved	Proposed
Western Embankment Slope and Transition Zone		
Outside slope angles	1:7 to 1:9	1:5.5 to 1:9
Inside slope angles	1:7 to 1:9	1:9. To 1:75 Except inside slope chainage up to 70, which will be 1:3 transitioning to 1:9.5 to retain tree G190

The proposed changes would result in the realignment of the crest path to the west to suit to the revised design, which results in a 2m increase in the overall length of the embankment. However, the proposed changes would not:

- Increase the height of the embankment;
- Change the capacity of the reservoir; or
- Impact the planning application boundary.

3 Environmental Appraisal

3.1 Background

The ES submitted in 2020 for the hybrid planning application assessed the potential for significant effects arising from the Scheme with respect to: air quality, historic environment, biodiversity, ground conditions, landscape and visual, noise and vibration, traffic and transport, material resources and waste, water (flows, quality and groundwater) climate, climate change vulnerability, population and human health, cumulative effects and vulnerability to major accidents and disasters.

The ES Addendum (2024) described the proposed changes to the Scheme as part of the Section 73 applications in 2024 and presented an assessment of any new or different significant effects that could result from these changes. The Vulnerability to Major Accidents and Disasters topic was scoped out of further assessment, as the changes to the Scheme would not result in any new, or materially different significant effects.

The 2024 ES Addendum confirmed that the impacts of the revisions, when taking account of mitigation and compensatory measures proposed as part of the original scheme and the Section 73 planning application, concluded that there were no new or additional significant effects.

3.2 Environmental Appraisal of Proposed Changes to Western Embankment Slopes and Transition Zone

The topics examined in the 2020 ES and/or 2024 ES Addendum have been appraised in order to determine whether the proposed changes to the western embankment of the reservoir and the transition zone to the southern embankment are likely to give rise to any new or materially different effects.

The environmental topics which have been reviewed are presented in Table 2.

Table 2: Environmental topics reviewed for Non-material Amendment of Section 73 Permission and Phase 3 RMA

2020 ES / 2024 ES Addendum Topic	Environmental Appraisal Summary
Air quality	<p>2020 ES</p> <p>The 2020 ES did not identify any significant adverse air quality effects during construction or operation.</p> <p>2024 ES Addendum</p> <p>For construction-generated road traffic, the average daily construction-generated vehicle flows was no greater than those predicted in the 2020 ES. There was no change to the planned operation of the Scheme and the assessment of effects presented in the 2020 ES remained unchanged.</p> <p>All relevant committed mitigation will continue to be applied to control potential residual effects to non-significant levels.</p> <p>As such, no change to the significance of effects were identified from air emissions and dust sources from that described in the 2020 ES.</p> <p>Western Embankment and Transition Zone NMA</p> <p>There will be no change to the significance of effects are anticipated from air emission and dust sources during construction.</p>
Historic environment	<p>2020 ES</p> <p>The 2020 ES reported that two heritage assets, comprising the Grade II* Leigh Park Registered Park and Garden, and the Sir George Staunton Conservation Area, would experience adverse effects that would be significant.</p> <p>2024 ES Addendum</p> <p>Any direct archaeological impacts arising from ongoing and future construction activities did not materially change from those assessed in the 2020 ES.</p>

2020 ES / 2024 ES Addendum Topic	Environmental Appraisal Summary
	<p>During construction, the magnitude of any change to the setting of the Grade II* Leigh Park Registered Park and Garden, the Sir George Staunton Conservation Area and the Listed Buildings did not materially alter.</p> <p>The position of the embankment crest would move further north, away from the Grade II* Leigh Park Registered Park and Garden, the Sir George Staunton Conservation Area and the Listed Buildings. As such, the changes to the Scheme did not alter the impacts presented in the 2020 ES.</p> <p>Overall, the design revisions did not result in any change to the significance of effects on heritage assets reported in the 2020 ES.</p> <p>Western Embankment and Transition Zone NMA</p> <p>The proposals would not materially change the construction phase footprint, operations, nor associated visual impacts upon the setting of the Staunton Country Park or the Sir George Staunton Conservation Area. The minor and imperceptible changes in operational landscaping/visual amenity effects would be consistent and fall within the granularity and flexibility of the published methodology, which both acknowledged and allowed for a degree of detailed design development.</p> <p>As such, no materially different significant effects on the historic environment would arise as a result of the proposed changes to the design. Consequently, there would no change to the significance of effects reported in the 2020 ES or 2024 ES Addendum.</p>
Ground conditions	<p>2020 ES</p> <p>The 2020 ES did not identify any significant adverse effects on ground conditions during construction with appropriate mitigation measures in place.</p> <p>2024 ES Addendum</p> <p>The significance of effects on ground conditions remained unchanged from those presented in the 2020 ES.</p> <p>All relevant committed mitigation will continue to be applied to control potential residual effects to non-significant levels, in accordance with the Record of Environmental Actions and Commitments (REAC) presented in the CEMP.</p> <p>A Materials Management Plan has been prepared to manage the site won materials and demonstrate that it is being appropriately used on site within the main reservoir works. As such, there are no changes to the significance of effects on ground conditions from that described in the 2020 ES.</p> <p>Western Embankment and Transition Zone NMA</p> <p>There will be no change to the significance of effects. There is only a 0.5% decrease to the volume of earthworks and as such there will be no change to the significance of effects on ground conditions during construction.</p> <p>Changes to the excavation and embankment earthworks volume would be reflected in the final Materials Management Plan</p>

2020 ES / 2024 ES Addendum Topic	Environmental Appraisal Summary
	<p>submitted as part of the CL:AIRE Definition of Waste: Code of Practice (DoWCoP) process. The Scheme promotes sustainable waste and material resource management in line with the Government's waste hierarchy to allow the re-use of suitable materials during the construction works.</p>
Noise and vibration	<p>2020 ES</p> <p>The 2020 ES reported that noise and vibration from construction works would not result in adverse effects that would be significant during daytime hours. During operation, no adverse effects were identified that would be significant on receptors.</p> <p>2024 ES Addendum</p> <p>During construction, noise and vibration would not result in adverse effects that would be significant during daytime hours with the implementation of mitigation measures. As such, the assessment presented in the 2020 ES remained unchanged.</p> <p>A Noise and Vibration Management Plan sets out the mitigation measures to be adopted during construction.</p> <p>During operation, the assessment of noise and vibration effects remained unchanged from the 2020 ES and there would be no significant adverse effects.</p> <p>Western Embankment and Transition Zone NMA</p> <p>The construction works, intensity, and plant would remain unchanged by the proposals. The slight change to the embankment would remain within the broad assumptions utilised for the published 2020 ES and 2024 ES Addendum.</p>
Biodiversity	<p>2020 ES</p> <p>The 2020 ES reported that there would be residual adverse effects that would be significant as a result of the direct loss of ancient woodland, habitat within Sites of Importance for Nature Conservation, priority habitat and watercourses.</p> <p>2024 ES Addendum</p> <p>The 2024 ES reported that a substantial area of habitat had already been cleared under the planning permission for the 2020 approved Scheme. No further land take or direct impact on ecological receptors was concluded with the proposed revisions to the Scheme.</p> <p>Western Embankment and Transition Zone NMA</p> <p>There would be no new effects on ancient woodland or veteran trees arising from the proposed design changes. There would also be no additional loss of existing habitat beyond that assumed within the 2020 ES and 2024 ES Addendum and would be in line with the Biodiversity Mitigation and Compensation Strategy.</p>

2020 ES / 2024 ES Addendum Topic	Environmental Appraisal Summary
Landscape and visual	<p>2020 ES</p> <p>During construction, significant adverse effects on landscape and visual amenity were reported in the 2020 ES from the Sir George Staunton Conservation Area, the Grade II* Leigh Park Registered Park and Garden, adjacent Public Rights of Way and from residential areas.</p> <p>2024 ES Addendum</p> <p>The 2024 ES Addendum reported that there would be no change to the landscape effects during construction (as presented in the 2020 ES), although the construction period would be extended for two years, which would increase the duration of the effects. There would also be no change to visual effects experienced during construction, except for the extension of the construction period by two years.</p> <p>During operation, the changes to the main embankment slopes would not result in a significant adverse effects on the landscape.</p> <p>The changes to the Scheme accords with the management objectives for the main embankment in the Havant Thicket Reservoir LEMP (Atkins, 2024). Adherence to the LEMP and future maintenance of landscape planting is a commitment made in the 2020 ES to mitigate the landscape and visual effects of the Scheme.</p> <p>Western Embankment and Transition Zone NMA</p> <p>The amendments to the scheme assumed for the purpose of the published 2020 ES and 2024 ES Addendum assessment are comparatively minor in scale and fall both within the granularity of the assumptions for the methodology, as well as its inherent flexibility to accommodate the design changes proposed.</p> <p>Therefore, the design amendments are consistent with the assessment in the 2020 ES and 2024 ES Addendum and no changes to their conclusions are required.</p>
Population and human health	<p>2020 ES</p> <p>The 2020 ES identified impacts on human health could arise during construction from the temporary reduction in access to open space which would be mitigated by maintaining safe access for the public, where possible.</p> <p>2024 ES Addendum</p> <p>The 2024 ES reported that during construction, access to open space would be temporarily restricted for an additional two years which would have an adverse effect on the local population. However, this would be mitigated by diverting access routes in order to maintaining safe access for the public wherever possible.</p>

2020 ES / 2024 ES Addendum Topic	Environmental Appraisal Summary
	<p>With mitigation, all construction phase residual effects on health determinants would remain unchanged from the 2020 ES.</p> <p>The likely significant effects assessed during operation of the reservoir, as presented in the 2020 ES, would also remain unchanged.</p> <p>A Construction Traffic Management Plan has been prepared which sets out how traffic and site operations will be managed during the main construction works and how construction staff will travel to and from the site.</p> <p>The Noise and Vibration Management Plan sets out the mitigation measures adopted during construction.</p> <p>All relevant committed mitigation would continue to be applied as envisaged to control potential residual effects to slight adverse levels. As such, there would be no change to the significance of effects reported in the 2020 ES with respect to population and human health.</p> <p>Western Embankment and Transition Zone NMA</p> <p>There will be no change to the significance of effects reported in the 2020 ES or 2024 ES Addendum.</p>
Traffic and transport	<p>2020 ES</p> <p>The 2020 ES did not identify any significant adverse effects arising from traffic and transport during construction or operation with mitigation measures in place.</p> <p>2024 ES Addendum</p> <p>The 2024 ES reported that although there will be a need to import a greater quantity of aggregate and sand during construction, the daily maximum number of heavy goods vehicles arriving and departing the construction site remained unchanged. Similarly, the daily maximum number of cars arriving and departing the reservoir construction site remained unchanged. As such, there were no significant change in effects resulting from construction related activities with the proposed changes to the Scheme.</p> <p>A Construction Traffic Management Plan has been prepared which sets out how traffic and site operations will be managed during construction and how workers will be travelling to and from site.</p> <p>No changes were proposed to vehicular access or parking provision during operation. As such, the findings of the traffic and transport assessment in the 2020 ES would remain unchanged and there would be no significant adverse effects during the operation phase.</p> <p>Western Embankment and Transition Zone NMA</p> <p>There will be no change to the significance of effects reported in the 2020 ES or 2024 ES Addendum.</p>

2020 ES / 2024 ES Addendum Topic	Environmental Appraisal Summary
Material resources and waste	<p>2020 ES</p> <p>The 2020 ES did not identify any adverse effects that would be significant on the availability of construction materials, or from wastes produced during construction.</p> <p>2024 ES Addendum</p> <p>The 2024 ES reported that a greater quantity of aggregate and sand will need to be imported for the changes to the Scheme, compared to the quantities assessed in the 2020 ES. Also, a greater quantity of fill material would also be sourced from within the reservoir site to build the larger footprint of the main embankment and for landscaping.</p> <p>Material for the construction of the main embankment would be largely sourced from the site. The design, mitigation and enhancement measures included in the 2020 ES remained relevant and no further mitigation measures were required.</p> <p>A Site Waste Management Plan has been developed to manage waste produced during construction.</p> <p>There were no changes to the significance of effects reported in the 2020 ES. The classification presented in the 2020 ES assessment remained valid based on the materials and wastes included.</p> <p>Western Embankment and Transition Zone NMA</p> <p>There will be no change to the significance of effects reported in the 2020 ES or 2024 ES Addendum.</p>
Water	<p>2020 ES</p> <p>The 2020 ES reported that there would be residual adverse effects that would be significant on aquatic habitats, habitat connectivity and geomorphology. Compensation and mitigation measures were identified for the impacted water body of Riders Lane Stream.</p> <p>2024 ES Addendum</p> <p>The changes to the Scheme did not alter the findings of the 2020 ES assessment and no additional mitigation would be required as part of the ongoing package of compensation and mitigation measures. The effects on flood risk were also no greater than those predicted in the 2020 ES.</p> <p>A Water Quality Management Plan has been prepared which provides details of mitigation measures required to protect the quality of surface and groundwater during construction.</p> <p>During operation, the significance of effects on the water environment would also remained unchanged from the 2020 ES.</p> <p>Western Embankment and Transition Zone NMA</p> <p>There will be no change to the significance of effects reported in the 2020 ES or 2024 ES Addendum.</p>

2020 ES / 2024 ES Addendum Topic	Environmental Appraisal Summary
Climate	<p>2020 ES</p> <p>The 2020 ES reported that the Scheme is unlikely to cause significant effects on climate, or significantly affect the UK's ability to meet its emissions reduction targets.</p> <p>2024 ES Addendum</p> <p>The greenhouse gas emissions from changes to the Scheme, together with the additional assessment of emission sources not considered in the 2020 ES, reported a 7% increase in construction emissions. However, the increase in emissions was not deemed material and the Scheme is anticipated to make a small contribution to the overall UK emissions. Therefore, the conclusion of the 2020 ES, that the Scheme is deemed unlikely to cause a significant effect on climate change remained unchanged. All relevant committed mitigation would continue to be applied as envisaged in the 2020 ES.</p> <p>The assessment of emissions during operation remained unchanged from the 2020 ES.</p> <p>Western Embankment and Transition Zone NMA</p> <p>There will be no change to the significance of effects reported in the 2020 ES or 2024 ES Addendum.</p>
Vulnerability to climate change	<p>2020 ES</p> <p>The Scheme includes embedded mitigation to avoid, minimise or reduce potential impacts from changes in climate. None of the potential climate vulnerability impacts identified would have adverse effects that would be significant with embedded mitigation.</p> <p>2024 ES Addendum</p> <p>During construction, the significant effects assessed in the 2020 ES, such as the likelihood for extreme weather events, would remain unchanged with embedded mitigation.</p> <p>The significant effects assessed during operation presented in the 2020 ES would also remain unchanged with embedded mitigation.</p> <p>Western Embankment and Transition Zone NMA</p> <p>There will be no change to the significance of effects reported in the 2020 ES or 2024 ES Addendum.</p>
Cumulative and In-Combination effects	<p>2020 ES</p> <p>The 2020 ES reported that with mitigation, there would be no adverse cumulative or in-combination effects that would be significant.</p>

2020 ES / 2024 ES Addendum Topic	Environmental Appraisal Summary
	<p>2024 ES Addendum</p> <p>The 2024 ES Addendum reported that there would be no change to the cumulative or in-combination effects arising during construction or operation. All relevant committed mitigation would continue to be applied as envisaged in the 2020 ES. As such, there would be no change to the significance of effects reported in the 2020 ES.</p> <p>Western Embankment and Transition Zone NMA</p> <p>There will be no change to the significance of effects reported in the 2020 ES or 2024 ES Addendum. The assessment of in-combination effects remains unchanged.</p>

4 Conclusion

This report has considered whether the proposed changes to the western embankment slope and transition zone are likely to give rise to any new or materially different significant effects to those identified in the 2020 ES and ES Addendum (2024).

This report concludes that the design changes submitted for the Non-material Amendment of the Section 73 Application and Phase 3 RMA does not give rise to any new or materially different effects to those reported in the 2020 ES or the ES Addendum (2024). All committed mitigation can continue to be effectively applied.