Development Control West Sussex County Council County Hall West Street Chichester West Sussex PO19 1TY Our ref 639383 – Henfield WTW NEP 2021 – EIA Screening Opinion Request

Date 20th September 2019

Contact

Tel 01273 663560

Email

lorna.brooks@southernwater.co.uk

By email only to planning.applications@westsussex.gov.uk

Dear Sir/Madam

# Request for Environmental Impact Assessment Screening Opinion for the Henfield Wastewater Treatment Works National Environment Programme (NEP) 5 Scheme

Southern Water propose to install additional wastewater infrastructure at Henfield Wastewater Treatment Works (WTW), hereafter referred to as the 'proposed development'. Henfield WTW is an operational Southern Water WTW located on the northern edge of Henfield, West Sussex.

The address for the WTW is Crouch Hill, Henfield, West Sussex, postcode BN5 9JN. The National Grid Reference is TQ 21761715.

This letter and enclosed supporting documentation is a formal request under the Town & Country Planning (Environmental Impact Assessment) Regulations 2017, for a screening opinion for the proposed development.

This screening request is to determine whether the proposed development requires an Environmental Impact Assessment (EIA). If the proposal is not found to be EIA development then it is considered that the proposed development will benefit from Southern Water's Permitted Development Rights under the Town and Country Planning (General Permitted Development) (England) Order 2015 (GPDO), Schedule 2, Part 13 (Water and sewerage), Class B - development by or on behalf of sewerage undertakers (a-f).

Temporary works would be carried out under the GPDO, Schedule 2, Part 4 (Temporary Buildings and Uses) Class A - temporary buildings and structures.

The proposed development can be considered to fall under Schedule 2, Table 11 (c) 'Waste-water treatment plants' of the EIA Regulations 2017 and as the area of effect exceeds the 1000m<sup>2</sup> threshold value, EIA screening is appropriate.

The proposed development is not located within a 'sensitive area', as defined in Part 1(2) of the EIA Regulations 2017.

Schedule 3 of the EIA Regulations 2017 require that such proposals be assessed against three broad criteria, namely:

- The characteristics of the proposed development (e.g. its size, use of natural resources, quantities of pollution and waste generated);
- The location of the proposed development and the sensitivity of the receiving environment; and

The characteristics and significance of the potential impacts (magnitude and duration).

The design process has included consideration of proposals by Southern Water's Environmental Advisor, Ecologists and Archaeologists. This has enabled potential impacts to be identified, avoided by design, minimised and prevented as far as practicable.

Southern Water's internal assessment of the proposed development and its potential environmental effects, is that it is not likely to have significant adverse impacts on the environment and therefore we would not expect the proposed development to be classed as an EIA development.

# **Development driver**

Southern Water has a duty under Part IV of the Water Industry Act 1991 to ensure that an efficient and economical system of wastewater collection and treatment is provided to customers.

Henfield WTW is a rural site that treats wastewater from neighbouring areas. By 2030, Henfield WTW is predicted to serve a population equivalent of 5619.

The driver for the proposed development is environmental improvement and is required to ensure that the discharge of final effluent from the WTW into the nearby watercourse (Cutlers Brook) is in compliance with the requirements of a revised permit from the Environment Agency.

Once the proposed development is in place, the WTW will be able to treat wastewater to achieve 0.40mg/l for phosphorus (12 month rolling average) and a 4mg/l iron permit (95%) with 8mg/l upper tier. The proposed development must be in operation by December 2021 to ensure compliance with a Regulatory Output date.

## **Development description**

The proposed development will be located entirely within the existing operational boundary of the WTW. The proposed items of plant and supporting works required as part of the proposed development are detailed as follows.

Description	Width (m)	Length (m)	Height (m)	Volume (m <sup>3</sup> )	Finish/Colour	Need	Planning requirements
Non-walk in ferric dosing kiosk	3.95	5.43	2.85	61.13	Glass reinforced plastic/Green	Process	To be carried out under Permitted Development Rights
Non-walk in alkalinity dosing kiosk	3.3	4.15	2.6	35.61	Glass reinforced plastic/Green		
2.No Mecana filters	2.68	5.7	3.55	54.23	Steel		
Flocculation tank	2.56	5.5	3.3	46.46	Steel		
Final effluent monitoring kiosk	1.65	1.65	2.5	6.81	Glass reinforced plastic/Green		
Final effluent sample chamber	0.7	1.2	1.8	1.51	Concrete		
Emergency Safety Shower	1.5	1.5	3.0	6.75	To be confirmed	Safety	

## Table 1: Description of proposed development

The proposed development also includes the installation of associated drainage pipework and cable ducts, control panels, interception chamber, distribution boards, new dosing points and the establishment of an 11m x 4m delivery bund and associated extension to the existing site access road within the WTW.

Photographs showing the site area and drawings detailing the proposed development are enclosed with this letter.

# Temporary construction compound

A temporary construction compound is needed for the proposed development. The temporary construction compound will be approximately 1200m<sup>2</sup> and will be established on an area of amenity grassland within the southern section of the WTW.

A maximum of eight cabins including office space, welfare facilities and stores will be established within this temporary construction compound.

The temporary construction compound will be established by soil stripping and the laying of type 1 gravel hardstanding. The compound will have concrete pad foundations. Smaller containers for

secure storage will also be sited within the temporary construction compound as will a temporary parking area. The temporary construction compound will be on site for the duration of the construction phase and then removed following completion of the proposed development.

# Construction programme

Construction is currently programmed to commence in February 2020 and is anticipated to take approximately 40 weeks, with an additional one week mobilisation and one week demobilisation period.

Construction work will be undertaken between 07.30 and 18:00 Monday to Friday. Weekend working is not anticipated. In the unlikely event that weekend working is required, this will be carried out on Saturdays between 08.00 and 14.00. Work on Sundays or any Bank holidays will be avoided where possible. Advance agreement will be sought prior to any works outside of these hours.

The timing of deliveries to the construction site will take account of any planned events in the area. This will be determined via consultation with West Sussex County Council.

# Traffic management and access

Temporary road closures and diversions will not be required to facilitate the construction of the proposed development. A Traffic Management Plan will be produced to ensure appropriate traffic management and minimise any disruption. West Sussex County Council will be liaised with to agree local issues and signage requirements where appropriate.

The existing access to Henfield WTW will be utilised and there will be no requirement for modification/widening of the existing access.

During the one week mobilisation period there will be 40 cars/week (eight daily movements), 20 articulated vehicles/week (four daily movements) and 30 light vans/week (six daily movements)

Traffic frequency and timing during the demobilisation period will be similar to that required for the mobilisation period.

During the 40 week construction period, there will be 20 cars/week (four daily movements), 10 articulated vehicles/week (two daily movements) and 20 light vans/week (four daily movements).

Henfield WTW is well connected to the major road network as it is located approximately 5.2 km to the west of the A23 dual carriageway.

Henfield WTW is accessed via a track located adjacent to the north of the residential estate, Wantley Hill Estate. The roads within the estate will not be affected by the proposed development.

The track exits onto the A281 Crouch Hill single carriageway. The B2116 is located off of the A281 to the north which leads to the A23.

The quality of the local road network is expected to easily cope with the relatively limited quantity of construction traffic required.

Henfield WTW is not supervised 24 hours a day, although Southern Water Operations regularly attend the WTW. There will be no change to this following completion of the proposed development.

Significant effects on traffic levels or the local road network are not anticipated during construction of operation of the proposed development.

## Demolition/decommissioning

No demolition or decommissioning is required as part of the proposed development.

## Site lighting

The construction works will be carried out during daylight hours where possible. During the winter months, should it not be possible to carry out the proposed development during daylight hours, minimal, task specific, downward facing lighting will be used.

New lighting columns will be installed for use during operation. These will be installed at the chemical delivery area and around the Mecana filters. This lighting will be directional and task specific.

## Site reinstatement

Following completion of the proposed development the temporary construction compound, including any unused materials will be removed from site. All areas temporarily affected by the proposed development will be reinstated on completion of the works.

## Environmental review

The potential environmental impacts of the proposed development have been considered and reviewed throughout the project development by an Environmental Advisor working with the Engineering Design Team to ensure any negative impacts are addressed and, as far as possible, designed out.

## Ecology and designated areas

A Preliminary Ecological Appraisal (PEA) for the proposed development was undertaken in January 2019 by a suitably experienced ecologist. The PEA consisted of a desktop assessment followed by a site walkover in order to identify any ecological constraints to the proposed development. This assessment was used to inform further surveys, mitigation and an Ecological Impact Assessment (EcIA) which is presented below.

## Statutory designated areas

Tottington Wood Local Nature Reserve is the closest statutory designated area to the proposed development located approximately 4.4km to the south. The proposed development will not directly affect any statutory designated sites due to the nature of the proposed development and distance to the sites. The proposed development is not connected to the sites by any potential pollution pathways and so will not be affected by the proposed development. Therefore there will be no effect on statutory designated sites.

There are two Special Areas of Conservation (SAC) designated for bats within 30km of the proposed development:

- The Mens SAC (approximately 20km north west); and
- Ebernoe Common (approximately 25km north west)

The proposed development will not affect these SACs designated for bats due to the limited extent of work within suitable bat habitat (removal of two trees) and the distance and lack of direct connectivity from the SACs to the proposed development.

## Non-statutory designated areas

There are two Local Wildlife Sites (LWS) within 2km of the proposed development:

- Henfield Common LWS (approximately 1.3km south); and
- Broadmare Common LWS (approximately 1.8km south)

There are four areas of Ancient Woodland within 2km of the proposed developments, the closest of which is approximately 700m to the west.

The proposed development will not directly affect any non-statutory designated sites due to the nature of the proposed development and distance to the sites. The proposed development is not connected to these sites by any potential pollution pathways and so the sites will not be affected by the proposed development.

## Habitats

The habitats in proximity to the proposed development were surveyed in January 2019 using the Phase 1 Habitat survey methodology (JNCC, 2010.1), allowing an appreciation of the likely ecological value of the area of the proposed development to be determined.

The majority of the proposed development is within areas of amenity grassland and hardstanding. These habitats are common in the UK and of limited value to biodiversity. It is anticipated that two trees (one ash and one white poplar) located on the northern perimeter of the WTW will be removed to facilitate the installation of the Mecana filter and flocculation tank. This habitat has the potential to support breeding birds and roosting bats.

## Protected species

## Badger

A badger survey was undertaken in January 2019 which found no evidence of badgers within 30m of the proposed development. As badgers are a highly mobile species, an updated badger sett check will be undertaken prior to works commencing on site. In the unlikely event that a badger sett is found within 30m of the proposed development, appropriate mitigation would be undertaken. With mitigation measures the proposed development is unlikely to have a significant effect on badgers.

## <u>Bats</u>

The proposed development has been designed to avoid areas of woodland and linear features, such as hedgerows and buildings where possible, which provide bat habitat, including foraging areas. The proposed development will however require removal of two trees (one ash and one white poplar). A preliminary ground level roost assessment of these trees was undertaken in January 2019. This

Southern Water Services Ltd, Registered Office: Southern House, Yeoman Road, Worthing BN13 3NX Registered in England No. 2366670

<sup>&</sup>lt;sup>1</sup> JNCC (2010) Handbook for Phase 1 Habitat Survey: A Technique for Environmental Audit, Joint Nature Conservation Committee

assessment determined the white poplar to have negligible potential to support roosting bats and the ash high potential.

As a result of the preliminary roost assessment a subsequent Potential Roost Feature (PRF) inspection survey was carried out in August 2019 by a bat licenced ecologist. This survey involved the use of tree climbing and an endoscope to access the PRF and assess in detail its likely suitability for a bats. The PRF inspection confirmed the negligible potential of the white poplar and downgraded the high potential of the ash to low. The ecologist recommended that precautionary measures, including a pre-fell endoscope inspection to reconfirm the absence of bats, are put in place during the felling of the low potential tree. With mitigation measures in place, and due to the limited extent of habitat affected, the proposed development is unlikely to have a significant effect on bats.

## Breeding birds

Vegetation in proximity to the proposed development, including the trees which are being removed, provide opportunities for numerous species of breeding birds. Southern Water undertook a desk study assessment of breeding bird species in January 2019 to establish the breeding bird species present in the area. The assessment identified that the area was dominated by common and widespread species, although species of conservation concern could also be present. As recommended by the assessment, the construction of the proposed development will aim to avoid removing potential nesting habitat during bird breeding season. If vegetation removal during the breeding bird season is unavoidable, then a pre-clearance breeding bird check will be carried out by a suitably experienced ecologist. With standard mitigation measures in place and due to the limited extent of habitat removal required the proposed development is unlikely to have a significant effect on breeding birds.

## Great crested newts

There are numerous ditches, in proximity to the proposed development, which may provide suitable habitat for great crested newts. However, no areas of standing water will be affected by the proposed development and construction work within terrestrial habitat is limited to amenity grassland and hardstanding which is not considered suitable habitat for great crested newts.

With standard mitigation measures in place and due to the limited extent of habitat suitable for great crested newts to be affected, the proposed development is unlikely to have a significant effect on great crested newts.

## **Biodiversity**

The proposed development has been designed with regard to conserving biodiversity. Additionally, the proposed development include measures to enhance habitat within the boundary of Henfield WTW to increase biodiversity. An isolated patch of scrub, which currently sits within an area of amenity grassland, will be thinned and given a scalloped edge. Arisings will be left in situ and the surrounding grassland left to develop into a longer sward. This will provide better connectivity to nearby hedgerows and maximise the interface between scrub and shorter vegetation, which is particular significance to reptiles.

## Ecological Assessment

The permanent development and the temporary compound are located entirely within the boundary of Henfield WTW. All potential disturbance of protected species and sensitive habitat associated

with the proposed development has been appraised. With the application of standard checks and the mitigation outlined herein there will be no significant impact on protected species, sensitive habitat, or designated sites.

Appropriate and proportionate biodiversity enhancements will be carried out.

#### Water resources

The proposed development is not located within a groundwater source protection zone. It is located within an area classed by the Environment Agency as a Secondary A superficial aquifer.

Dewatering of excavations may be required during the construction phase whereby the water, if uncontaminated, will be discharged to a local watercourse in accordance with the 'Temporary Dewatering from Excavations to Surface Water' Regulatory Position Statement (RPS) published by the Environment Agency in February 2018.

If the conditions of the RPS cannot be complied with an Environmental Permit will be obtained for this temporary dewatering activity or the water will be tankered away and disposed of at a suitably licensed disposal site.

The proposed development located along the northern perimeter of the WTW is located within Flood Zone 2 (land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding). The proposed development, including the temporary construction compound located within the southern section of the WTW is located within Flood Zone 1 (less than 1 in 1000 annual probability of river flooding).

The northern section of the WTW is located in an area classed as being at low risk (between 0.1% and 1 %) of surface water flooding. The southern section of the WTW is located within an area classed as being at very low risk of surface water flooding (0.1%).

Surface water either infiltrates into surrounding ground or enters surface water drainage located in the existing site roads. There will be minimal change to surface water run-off as a result of the proposed development.

Internal flood risk assessments are carried out as part of the design process to ensure there is no flood risk to and from the proposed development. The outcomes of the flood risk assessment will be fed back into the design to ensure that there is no flood risk to and from the proposed development.

There are no works required within, adjacent or under watercourses. Pollution Prevention Guidelines will be followed to ensure no significant impact on the watercourse.

Construction of the proposed development and any dewatering will be carried out using best practice techniques, in accordance with Pollution Prevention Guidelines. As such, no significant effects to water resources as a result of the construction phase are anticipated.

Due to the tighter permit requirements for phosphorus and iron, there will be an improvement to the consented flow from the WTW being discharged into the watercourse as a result of the operation of the proposed development. As such, no significant effects to water resources as a result of the operational phase are anticipated.

## Trees and arboriculture

The proposed development is not located in a conservation area and there are no trees protected by a Tree Preservation Order located in the area of the proposed development.

Two trees (one ash and one white poplar) located on the northern perimeter of the WTW will be removed to facilitate the installation of the Mecana filter and flocculation tank.

In 2019, a complaint was received from a member of the public regarding the removal of trees undertaken for operational reasons along the northern perimeter of the WTW and the belief that the trees were protected by a previous planning condition.

Southern Water's review following the complaint identified that a planning permission obtained from West Sussex County Council in 2005 for the installation of new infrastructure included the following planning condition:

'The existing trees, bushes & hedges on the east, west and north boundaries of the site shall be retained and protected in a manner to be approved in writing by the Waste Planning Authority before the development commences for the duration of the development and shall not be damaged, destroyed, uprooted, felled or topped during that period without the previous written approval of the Waste Planning Authority. Any such trees removed without permission or dying or being seriously damaged or diseased during that period shall be replaced in the following planting season with trees of the size and species as may be approved by the Waste Planning Authority.

Reason: In order to safeguard the visual amenity of the area'

It is the view of Southern Water's Town and Country Planner that the planning condition appears to have been intended to apply during the construction works of the previous project only. Therefore, the condition would not restrict the removal of the two trees required as part of this proposed development.

Consultation with the local community will be carried out to inform them of the proposed development and requirement for removal of the two trees.

Any additional excavation that is required in tree root protection zones of other trees will be carried out using hand digging in accordance with guidance set out in Street Works (2007) Volume 4: Street Works UK Guidelines for the Planning, Installation and Maintenance of Utility Apparatus in Proximity to Trees (Issue 2), British Standard 3998:2010 Tree Work - Recommendations and British Standard 5837:2012 'Trees in relation to design, demolition and construction. Recommendations'.

Following the methodology stated above during construction will enable any adverse impact to tree roots to be minimised. Residual impacts to trees are therefore assessed as being negligible and therefore not significant.

## Archaeology and cultural heritage

Following a review of the proposed development by a suitably qualified and experienced archaeologist it is identified that there are no designated heritage assets within or adjacent to the WTW site. The WTW is not within a conservation area, nor is it located within an archaeological notification area.

In terms of archaeological potential, the Portable Antiquities Society has recorded over 50 instances of finds recovered from within 1km of the WTW, ranging from prehistoric flint tools, Roman pottery and brooches to post-medieval date metal work. However nearby archaeological investigation (Archaeology South East, 2012) undertaken as part of a planning condition, recorded a largely negative result, retrieving only a small quantity of prehistoric flint work and post-medieval date residual finds. Satellite imagery and LiDAR data indicates the likely presence of field boundaries in surrounding fields. Based on this information, the archaeological potential of the WTW area is unknown, but is considered low to low-moderate.

The proposed development are small scale and in locations that will have been heavily disturbed during the installation of the extant infrastructure. The area of the temporary construction compound partially includes an area formally used for car parking and storage and is therefore considered to be disturbed. The adjacent surrounding fields are also likely disturbed due to the presence of ground drains and due to agricultural activity, indicating that the area of the WTW is likely to have been effected also.

Based upon the above information, no further archaeological assessment/investigation of the proposed development is considered.

## Waste, natural resources and land-use

There are no current or historic landfill sites located at Henfield WTW or within 250m. The proposed development is located on an operational WTW and therefore there is the potential to encounter contamination associated with such operation during excavation works.

Environmental management measures during construction will be incorporated into a Construction Environmental Management Plan or suitable equivalent to ensure there are no risks to human health or the environment as a result of the proposed development. This would include but is not limited to the following:

- Good management of stockpiles to prevent windblown dust transport pathways or run off, such as proper storage and covering of excavated material.
- Use of Personal Protection Equipment (PPE).
- Standard site hygiene practices.
- Should visual or olfactory signs of contamination be identified or suspected during excavation, a contaminated land specialist will be consulted for advice and managed in line with guidance and best practice, such as Contaminated Land Report (CLR 11) Model procedures for the management of contaminated land (Environment Agency, 2004).

The construction phase for the proposed development has potential to generate waste materials, from the following:

- Surplus excavated materials (soils or substrata); and
- Construction materials (e.g. concrete, aggregates).

Approximately 100m<sup>3</sup> of waste arisings are expected as a result of excavation for the installation of the Mecana filters and flocculation tank. This will be removed off-site.

If suitable, excavated material will be re-used as backfill or for reinstatement of trenches in accordance with principles outlined within the Contaminated Land: Applications in Real Environments Definition of Waste Code of Practice (2011).

Sustainable construction techniques will be adopted where reasonably practicable. The use of resources will be minimised through construction site best practice and by maximising the amount of materials that can be re-used or recycled.

A Construction Environmental Management Plan (or suitable equivalent), Site Waste Management Plan (SWMP) and Principal Contractor Environmental Management Systems will also stipulate the responsible use of energy and water during the construction phase in accordance with best practice.

A SWMP will be produced prior to the start of construction. The SWMP will detail measures to minimise disposal and maximise re-use and recycling in accordance with the waste hierarchy.

The SWMP would be used to derive the management options that would achieve the highest practicable performance levels within the hierarchy, such as sourcing, transport, use and disposal of materials in a sustainable manner and to ensure that unavoidable construction waste is identified and able to be managed in accordance with the waste hierarchy and other relevant legislative requirements. Disposal to landfill will only be used as a last resort.

The proposed development is located entirely within the perimeter of a WTW and therefore no additional land-take is required.

Based on the above, no likely significant environmental effects to waste, natural resources and land-use are anticipated as a result of the proposed development.

#### Climate change

The proposed development has been designed with sufficient capacity to ensure that predicted levels of increased flow due to increased storm intensity associated with climate change can be accommodated.

#### Risk from major accidents or disaster

The proposed development and existing WTW site does not present and is not at significant risk from major accidents and or disaster. During the construction period, risk assessments and method statements will be prepared to ensure that adequate responses are in place in the event of major accidents, or disaster.

The design of the proposed development will ensure that the necessary construction standards are met to provide adequate resilience against major accidents and disasters.

#### Rights of way and local disturbance

The proposed development is located in the confines of the existing WTW site and no Public Rights of Way (PRoW) will be affected by the proposed development.

The proposed development will lead to a slight increase in traffic on local roads during construction, as described in the traffic management and access section above. The level of

movements generated are considered to be low and not assessed sufficient to lead to a significant impact.

A Traffic Management Plan will include measures to control traffic accessing the works and to ensure that deliveries arrive at the sites and only at appropriate times.

#### Landscape and visual

Henfield WTW is not located in a National Park or Area of Outstanding Natural Beauty. The closest residential properties are located at Wantley Hill Estate approximately 80m south west of the southern boundary of the WTW.

The proposed development includes the installation of new equipment with a maximum height of 3.5m within an existing site which includes equipment up to 10m in height.

Trees screen views into the WTW from the north and east and from the south west and south east corner. Trees located along the southern edge of the access track also screen views across the field into the WTW from the residential properties on the Wantley Hill Estate.

Two trees (one ash and one white poplar) will be removed to facilitate the installation of the Mecana filter and flocculation tank. These trees are located on the northern perimeter of the WTW. The removal of the trees will not have a material impact on views into the WTW.

Based on the above, significant impacts to the landscape and visual amenity of the local area are not anticipated.

#### Noise

The closest residential receptors to Henfield WTW are located approximately 80m from the south western boundary of the WTW.

Temporary construction noise will arise from the establishment and operation of the temporary construction compound and excavation works. Construction of the proposed development will require the use of standard construction machinery including lorries and excavators. Piling activities are not anticipated.

Construction methodologies, compliance with appropriate working hours and good working practices including sensitive timing of potentially noisy work, will ensure the impacts of noise over the construction period are not significant.

The majority of the proposed development involve kiosks, with internal dosing pumps, tanks and chambers, as such significant operational noise sources are not anticipated.

The two Mecana filters have an anticipated noise level of <70db at 1.0 metre. As there is a distance of 220m between the filters and the curtilage of the nearest residential property, significant operational noise sources are not anticipated, however this will be considered further during the detailed design stage.

## Odour, air quality and dust

No additional odour sources are being created at the WTW as part of the proposed development. Therefore, the level of overall odour emissions from the WTW will not change as a result of the proposed development.

Potential short term and temporary effects on air quality could arise during construction as a result of:

- Localised additional emissions generated by plant and machinery;
- Additional emissions due to increased traffic at the site (travel by site operatives, delivery of materials); and
- Increases in fugitive dust emissions as a result of excavation works and the demolition of the concrete outfall chamber.

Normal preventative measures such as damping down of dust generating activities or areas will be undertaken and specified in a Construction Environmental Management Plan or suitable equivalent.

The proposed development does not include equipment which will create emissions, therefore its operation will not cause a detrimental effect on the local air quality.

# Cumulative impacts

No cumulative impacts are anticipated as a result of the construction or operation of the proposed development. This is due to the relatively limited scope and volumes of traffic movement associated with the proposed development and its on-going maintenance/operation within the existing WTW.

## Summary

During construction and operation of the proposed development, Southern Waters obligations under the Wildlife and Countryside Act 1981 (as amended), the Habitat Regulations 1994 (as amended), Water Industry Act 1991 and all other relevant environmental legislation will be complied with to ensure that the proposed development will be carried out in a manner that does not result in a significant impact.

Once the proposed development is in place there will be an improvement in the quality of final effluent released into the environment. The proposed development will ensure the operation of the WTW is in compliance with Permit from the Environment Agency.

In view of the project design, planned project management and our assessment of the areas to be affected, Southern Water are of the opinion that the proposed development will not likely result in significant effects and as such an EIA is not necessary. We request the Council's opinion in this matter.

Should you require any further information to form a decision, please do contact me.

Yours faithfully

L.Brodes

Lorna Brooks

Southern Water

# **Enclosures:**

- EIA Screening Opinion Request Supporting Photographs
- Drawing number JN.639383.OG0006 Henfield WTW General Site Layout