

- bund will restrict access and also risks the structural integrity of the soakaway.
- 3.45 It is unclear why soakaways are proposed given the stated intention to recover and re-use water from the facility. Further explanation is required.
- 3.46 The report confirms that water consumption will be by mains supply from Southern Water. The exact source (point) of the mains supply cannot be stated, however all of Southern Water's supply in this area is from groundwater sources. An increase in demand in an already vulnerable region may affect the regional groundwater resources and dependent water features. There is the potential for this development to impact groundwater resources regionally due to the increased pressure put upon the supply of Southern Water. Considering that the area's rivers are almost entirely groundwater fed, this is of critical importance.
- 3.47 No evidence is provided to justify the water requirement of 135,000m³ a year, nor is there any evidence to demonstrate that the level of water required to supply the development is available and that it has been taken into consideration in Southern Water's Water Resources Management Plan which forecasts significant water supply deficits within Hampshire. Further information is required on these points.
- 3.48 The impact on groundwater recharge from such a large building on the aquifer needs to be considered.
- 3.49 In summary, the PEIR does not provide sufficient information to demonstrate the level of potential impact on the water environment from the proposed development. The high importance and sensitivity of the chalk aquifer and its dependent receptors have not been adequately presented.
- 3.50 The Proposal will be situated directly over a highly sensitive and regionally important aquifer and in close proximity to water dependent SSSIs (Rivers Test and Dever). Groundwater is potentially close to the base of the proposed basement construction; this increases the potential for impacts from the construction and operation of the site on groundwater flow and quality.
- 3.51 Further technical comment on the water resources and flood risk assessment is included as an appendix to this report.

Ground Conditions

- 3.52 Table 12-1 acknowledges the requirement in the Scoping Opinion for a full suite of intrusive surveys including borehole investigations and soil sampling to inform the assessment. It is unclear why the applicant's response is that *'an extension to the existing site investigation will be recommended for the eastern and northern parts of the site (identified as 'Construction Laydown Area') post development consent'*. If the site investigation is only done post development consent it cannot inform the assessment and is not in accordance with the Scoping Opinion. The work has to be done before an application for consent can be considered.
- 3.53 It is noted that the full quantitative risk assessment required by the Environment Agency is not proposed to be included despite the exceedances of polycyclic aromatic hydrocarbons (PAH) and total petroleum hydrocarbon (TPH) contamination exceeding the Generic

- Assessment Criteria for controlled waters. This is unacceptable.
- 3.54 The study area for ground conditions is defined as being 500m from the site boundary as defined in the EIA Scoping Report (see paragraph 12.23). As the boundary of the site has increased significantly since the Scoping Report was prepared, the study area should be similarly increased.
- 3.55 As discussed previously, the fact that it is proposed to excavate up to 50,000m³ of material to accommodate the bunker, should have been made clear in the proposals chapter and the impact of this assessed. Notwithstanding this, further explanation is required as to how this area will be used, at what point in the process excavated material will be deposited on site and the extent to which this will preclude use of the site as a construction compound. No information is provided on final site levels and therefore it is not clear how the impact of these earthworks has been assessed, if indeed it has been. It must be.
- 3.56 The PEIR notes that the application does not seek a maximum depth but notes that the maximum depth of excavation for the land required permanently is unlikely to exceed 6m bgl. This is not acceptable, particularly in light of the fact that groundwater has been recorded at 6.3m bgl. Given the potential for harm to groundwater resources, a maximum depth must be specified in the application and the impacts of that level of excavation properly assessed. Without specifying a maximum depth, the conclusions of any assessment cannot be relied upon and would fail to comply with the requirements of the EIA Regulations – by leaving a hole in the Rochdale envelope.
- 3.57 It is understood that the bunker will require piled foundations. The implications for the aquifer of piling need to be assessed.
- 3.58 Paragraph 12.114 of the PEIR note that a cut and fill balance will be sought to minimise the requirement for import or export of materials and associated traffic and environmental effects. Further explanation is required on the assumptions relied upon for import and export of materials. As currently drafted, it is not clear what has been taken into account in the assessment.
- 3.59 It is not sufficient to avoid assessment of the grid connection on the basis that there is no information in the public domain on which to undertake a thorough assessment. The grid connection is an essential part of the project. Without it, the proposal is simply an incinerator.
- 3.60 It is assumed that the grid connection will be underground and therefore there is potential for ground conditions to be affected. The fact that no information on this issue has been provided is a serious omission. The obligation on the applicant to carry out an assessment is entirely independent of the quantity of information in the public domain.

Archaeology and Heritage

- 3.61 The policy tests in the National Planning Policy Framework (NPPF) on the consideration of potential impacts (paragraphs 193-197) are not properly addressed despite the PEIR noting that the policies of the NPPF are more up to date than the NPS and are likely to be 'strongly considered in the decision making process'. Reference should be made to the balancing exercise required between harm and public benefit in undertaking the