Environmental Impact Assessment: Screening Opinion Request

Client: Affinity Water Limited
Scheme name: Egham to Iver Trunk Main

30th January 2026

Project details

Project name	Egham to Iver Trunk Main
Scheme number	24004343

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APPROVED BY	
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Contents

Supporting Documents

TYPE	DOCUMENT NAME
Preliminary Ecological Appraisal	20241220_Iver to Egham_PEA
Wintering and Breeding Bird Report	TT4103-Iver to Egham-WBS BBS-R01-Rev00
Botanical Scoping Survey	099-01_Iver-Egham Pipeline_Botanical Scoping Survey_Technical Note
Ground Level Tree Assessment - Bats	Joanna Graham Ecology Ltd GLTA Iver to Egham JGE07724
Hazel Dormouse survey	Joanna Graham Ecology Ltd Hazel Dormouse Survey Iver to Egham JGE07724
Great crested newt HSI/eDNA	Joanna Graham Ecology Ltd eDNA Letter Iver JGE07724
Arboricultural Survey – Tree Constraints Plan	Iver to Egham_Pipeline TCP
Archaeological Desk – Based Assessment	24004343_Iver to Egham_DBA
Geophysical Survey	Iver to Egham Trunk Main_V2

Appendices

Appendix 1 – Ecological sites within proximity to the proposed works

Appendix 2 – Relevant Planning History

Drawings

DRAWING NO.	TITLE	SCALE
24004343_PLN_SI_2.3	Site Location Plan	1:2500

1 Introduction

1.1 Background

1.1.1 Dalcour Maclaren (DM) has been commissioned by Affinity Water Limited (AWL) to submit an Environmental Impact Assessment (EIA) screening opinion request (EIA SOR) for the proposed installation of a underground potable water trunk main that spans approximately 11.5km from Egham Water Treatment Works (WTW) (approximate postcode: TW18 3AX, National Grid Reference: TQ 02279 71691) to Iver WTW (approximate postcode: SL0 9HL, National Grid Reference: TQ 04480 80204).

1.1.2 The proposed development spans across six Local Planning Authorities (LPAs):

- Spelthorne Borough Council (4 km)
- Buckinghamshire Council (2.4 km)
- Hillingdon London Borough Council (1.8 km)
- Slough Borough Council (2.4 km)
- Windsor and Maidenhead Council (2 areas totaling 0.8 km)
- Runnymede District Council (0.1 km)

1.1.3 The route and the sections that lie within each authority are shown in Figure 1 below:

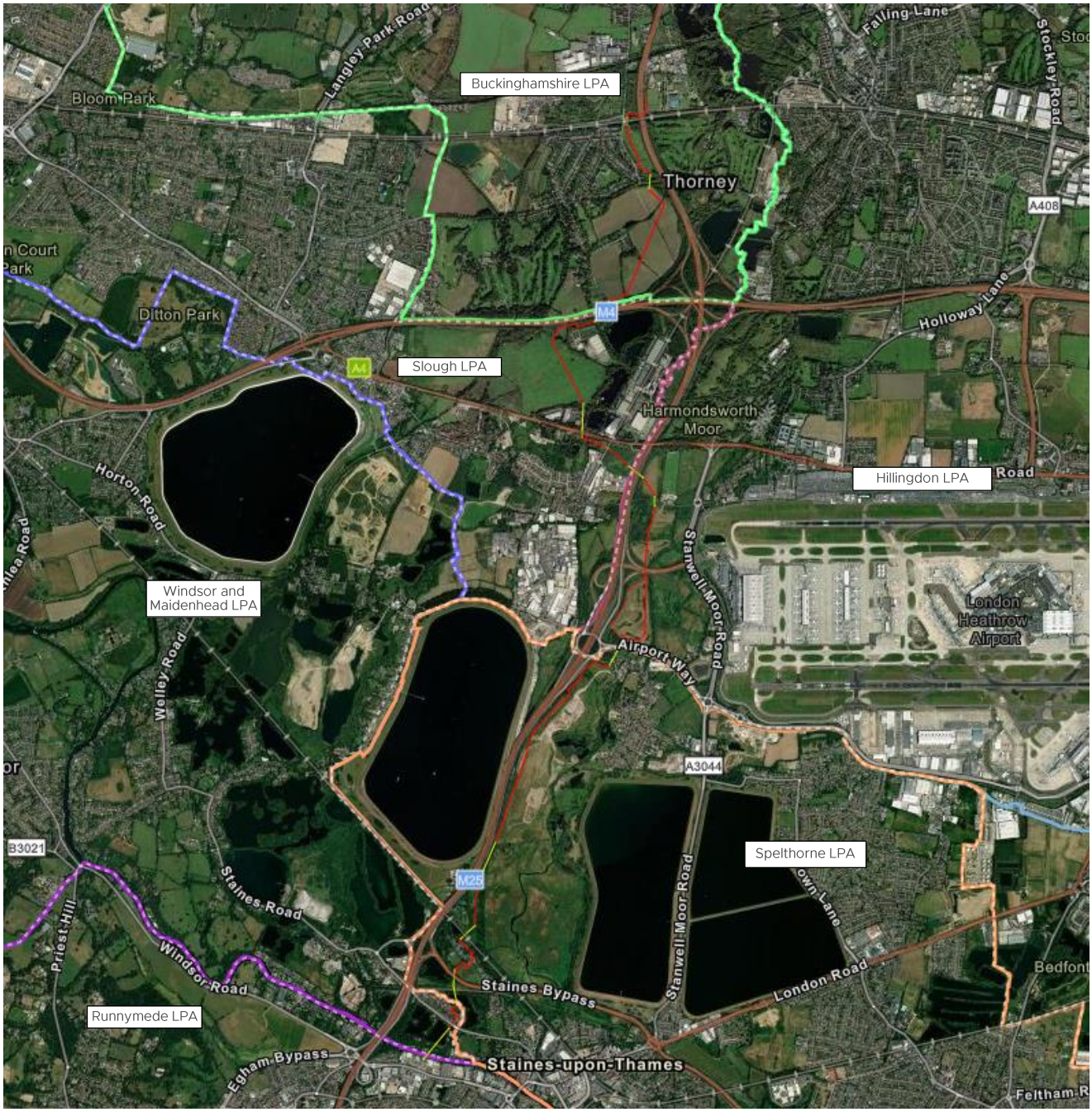

Figure 1 Proposed Pipeline Route and situation within each Local Planning Authority (LPA) (DM ESRI WebApplication)

1.1.4 AWL, the proposed water trunk main operator, is a regulated utility company with statutory responsibilities for the supply and distribution of clean, potable water. Its statutory responsibilities are outlined further in section 1.2 below. AWL is committed to sustainable development and maintaining the highest standards of environmental compliance and consideration, whilst maintaining the delivery of their statutory duties. Thus, AWL has designed the proposed pipeline route in the context of limiting environmental impacts and ensuring engineering feasibility.

1.1.5 Extensive feasibility studies, technical surveys and consultations with relevant stakeholders have informed the design of the proposed development. Alternative routes have been assessed, which has resulted in the current proposed alignment being considered the most appropriate solution in both environmental and engineering terms. Additionally, the route and construction methods and practices

of the proposed development have been carefully selected to avoid significant harm to sensitive environmental receptors. Details of these discussions and optioneering strategies are set out below in Section 2.3.

1.1.6 The information provided in this request satisfies the requirements outlined in Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, hereafter referred to as the 'EIA Regs'.

1.1.7 This request is being made in order to establish whether an Environmental Statement is required for the proposed development. Notwithstanding the outcome of the SOR, further technical assessments and engagement, as necessary will be undertaken ahead of the commencement of development.

1.1.8 This report is supported by a Site Location Plan and Indicative Route Layout, in addition to an archaeological Desk Based Assessment (DBA), Geophysical Survey, Preliminary Ecological Appraisal, Wintering Bird Survey, Botanical Scoping Survey, Great Crested Newt Habitat Suitability Index (HSI) and Environmental DNA (eDNA) Ground Level Tree Assessment for Bats, hazel dormouse surveys and Arboricultural Tree Constraints Plan and Schedule.

1.2 Statutory Responsibility

1.2.1 AWL is a regulated utility company with statutory responsibilities for the provision of clean, potable water. Under section 37(1) of the Water Industry Act 1991 (as amended) AWL must:

> *"develop and maintain an efficient and economical system of water supply within its area and to ensure that all such arrangements have been made-*
>
> *(a) for providing supplies of water to premises in that area and for making such supplies available to persons who demand them; and*
>
> *(b) for maintaining, improving and extending the water undertaker's water mains and other pipes,*
>
> *as are necessary for securing that the undertaker is and continues to be able to meet its obligations under this Part."*

1.2.2 The proposed development is required to ensure that AWL continues to fulfill its statutory duty to maintain sustainable water delivery across the South of England. As part of this statutory responsibility for the provision of water, AWL must ensure that the wider environment is protected by undertaking this activity in a sustainable manner[1]. The proposed pipeline is intended to facilitate a more sustainable method of water distribution, through reducing dependency on chalk stream abstraction. This is explained in more detail in section 2.2 below.

1.3 Stakeholder Engagement

1.3.1 Consultation to date on this project has been undertaken with Natural England (NE), Spelthorne Borough Council and the remaining five LPAs for which the project will fall within.

1.3.2 A presentation and consultation discussion was undertaken with Spelthorne Borough Council on 13th March 2025. During this meeting, the project team discussed the proposals and their drivers, surveys undertaken to date and planned for the remainder of the project, in addition to the route optioneering process of the project.

[1] In accordance with section 2(3) of the Water Industry Act 1991 (as amended) the regulator has a duty to ensure that the activities of utility companies are performed, "…in the manner…best calculated to contribute to the achievement of sustainable development."

1.3.3 It was agreed with Spelthorne that they would act as the lead determining authority for the EIA SOR, with the remaining five LPAs being consulted throughout the process.

1.3.4 Project briefing letters have been issued to these five LPAs to notify them of this EIA SOR ahead of submission.

1.3.5 Consultation with NE has been undertaken between November 2024 and June 2025. This consultation has formed part of the route optioneering process in order to minimise impact on ecological assets, as discussed below in sections 2.3 and 4.2.

1.3.6 Additionally, consultation with landowners and Heathrow Airport is being undertaken as part of this project in order to inform the overall route optioneering and engineering strategy.

2 Project Development

2.1 Project Description

2.1.1 The scheme will comprise the construction of approximately 12km of (on average) 800mm diameter underground trunk main. The total length of the pipeline will be dependent on the chosen route option, comprised from those in Figure 1. The trunk main and associated chambers will be wholly underground, with some associated above ground assets, including valves, manholes and marker posts.

2.1.2 The proposed trunk main will be installed over a 3-4 year period, and phased in accordance with landowner agreement, ecological seasons and construction programme feasibility.

2.2 Need for the Proposed Development

2.2.1 This pipeline will allow AWL to facilitate the transfer 40Ml/d of water from Egham to Iver WTW. Driven by the need for reduction in chalk stream abstraction, AWL's proposed Egham to Iver pipeline will facilitate the treatment and distribution of surface water extracted from the River Thames.

2.2.2 Water provision in this area has historically relied on abstraction from chalk streams—ecologically important habitats that support diverse biodiversity.

2.2.3 With new housing development targets and the need to reduce abstraction from these sensitive chalk habitats, Affinity Water must improve its delivery network to ensure sustainable supply. The proposed trunk main is a key component of Affinity Water's Connect 2050 programme, which focuses on investment to achieve sustainable water delivery between 2025 and 2050.

2.2.4 Affinity Water's Water Resource Management Plan (WRMP) models future demand under various scenarios, including increased housing development. It also sets out how the company will address projected supply deficits during a severe drought (1 in 200-year event, or 0.5% annual probability). As part of these long-term plans, the proposed trunk main will provide a critical link, enabling Egham and Iver WTWs to treat and distribute surface water from the Thames—significantly reducing reliance on chalk stream abstraction.

2.2.5 The overall driver for the scheme therefore is to provide environmental benefits to the relevant authorities and the wider environment whilst meeting their statutory obligation.

2.3 Route Optioneering

2.3.1 AWL has investigated several route options in order to locate the most feasible and least impactful route. A summary of alternative options that have been explored and ruled out during initial design and feasibility stages is provided below:

Option 1: West of the M25

2.3.2 A route was explored where the pipeline would be routed west of the M25. Benefits of this route would involve no requirement to construct within Staines Moor SSSI. However, this route was identified to pose large impacts to the communities of Hythe End, Wraysbury, Horton, Colnbrook, Brands Hill, Sutton, Langley and Richings Park with construction required along narrow roads, and along several Public Rights of Way (PRoW), which would require closure and / or diversion. Furthermore, there would be impacts on homeowners and businesses in proximity to the proposed pipeline route for the duration of construction, due to the likely requirement for road closures and long diversion routes.

2.3.3 This route option also faced engineering feasibility obstacles. Construction within narrow roads would make vehicle manoeuvring and the construction process challenging.

2.3.4 Construction along Wraysbury Road would require the pipeline to cross beneath the M25 whilst also crossing a Thames Water aqueduct (Colne Brook) at the same location. The under bridge is narrow and congested with existing utilities services and therefore it was considered unlikely to be feasible.

2.3.5 Crossing of the railway line adjacent to Wraysbury Station posed a considerable challenge due to the lack of any space required to undertake a trenchless crossing (operational reservoir land and gravel pits). Also laying a pipe of the required diameter in the deck of the existing road bridge was considered to not be achievable. As such, this route option was discounted on the basis of engineering unfeasibility and the considerable disruption to local residents and businesses.

2.3.6 Therefore, this route was not explored any further and has not been discussed further within this EIA SOR.

Option 2: Route east of M25

2.3.7 Given the feasibility challenges and potential community impact of route option 1 discussed above, an alternative was reviewed to route the pipeline on the east of the M25 where there is less residential development. It was also a shorter, more direct route.

2.3.8 Therefore, benefits of this option were considered to be: reduced impact on community by reducing excavation in towns and roads, reduced carbon equivalent emissions due to reduction in pipework length (compared to route option 1), less complex road, watercourse etc. crossings. Furthermore, the majority of the route was located off the highway, with strategic access points identified, thus minimising the potential impact of traffic management systems on the local and surrounding road networks.

2.3.9 This route also avoided Scheduled Monuments and Listed Buildings.

2.3.10 Downsides to this route included locating the pipeline through Staines Moor SSSI, areas of Common Land (Staines Moor and Staines Lammas) and through historic waste sites (Brett Aggregates Landfill)

2.3.11 From a detailed review of route options 1 and 2, and following consultation with Natural England (NE), the project team determined that a modification of route 2 would be the most feasible approach to present minimal impact on both local communities and the environment. Therefore, the below route option 3 was designed.

Option 3: Modified route east of the M25 (Brett Aggregates Landfill and Staines Moor SSSI land)

2.3.12 Engagement with NE was undertaken between November 2024 – September 2025, with Route Option 2 presented. NE advised that routing the pipeline to the west of Staines Moor SSSI, along the disused railway line, would be less impactful on the ecological value of the SSSI and therefore adequate reinstatement of the habitat and ground following completion of the works could be achieved. NE stated that *"the disused railway line represents a route through the SSSI which has been subject to historical disturbance [and therefore] impacts of excavation here would be more readily mitigated and the prospects for restoration of the habitat more readily achievable"*.

2.3.13 As the SSSI is designated for its flora and fauna, following this liaison with NE, botanical surveys have been undertaken to evaluate the floristic features within the

proposed pipeline corridor, to ensure minimal impact on the features of the SSSI and ensure habitat reinstatement would be achievable. This is discussed further in section 4.2.

2.3.14 Therefore, Route Option 3, set out within this EIA Screening report, and as shown in**Error! Reference source not found.** Figure 1, has been chosen to meet NE's comments and reduce impact on surrounding ecological, archaeological, heritage and community assets.

Future Variability in Route Option 3

2.3.15 Due to several factors, including engineering feasibility, upcoming ground investigation works and ongoing environmental surveys, the exact routing of the proposed pipeline is not yet confirmed. Therefore, a possible alternative alignment is shown for some sections of the proposed pipeline route (shown on Figure 1 and Site Location Plan (drawing ref: 24004343_PLN_SI_2.3).

2.4 Construction Methodology

2.4.1 The pipeline will be designed and constructed to typical engineering standards used by AWL and buried with a minimum of 900mm cover. The depth of the pipeline will be calculated to suit the geological conditions, AWL's best practice engineering guidelines and as agreed through stakeholder engineering approval processes (including, but not limited to, Network Rail, Highways England and the Environment Agency).

2.4.2 It is anticipated that much of the pipeline will be comprised of either Ductile Iron or Steel, with the potential for plastic in certain sections. Several factors, including materials chosen, pipeline diameter and pressures in the pipeline system pose the project with design and construction constraints, such as flexibility resulting in the need for long 'straight' sections of pipeline. The rigidity of the pipeline, in addition to residential, ecological and engineering assets located along the route, has constrained routing options for the pipeline.

Pipeline Installation

2.4.3 Construction activities will be undertaken within a fenced strip of land (working corridor). This will measure approximately 15m either side of the pipeline. Larger working areas will be necessary where the pipeline intersects with road, railway, watercourse and service crossings via trenchless methodologies. These larger areas will be necessary to establish the pipeline launch and reception pits, in addition to providing suitable storage for excavated material, storage of pipeline sections, flushing lagoons, surface water management and disposal, off-road temporary parking space, access provisions and equipment such as that needed for the construction of the crossing.

2.4.4 The proposed pipeline and indicative positions of valves, chambers and access points have purposefully been routed to follow existing field boundaries as far as reasonably practicable. Where possible, existing gaps in hedge lines will be utilised and mature trees avoided.

2.4.5 The majority of the proposed pipeline will be installed via open-cut trenching, with areas installed using trenchless techniques such as microtunnelling or Horizontal Directional Drilling (HDD) (as seen on Figure 1**Error! Reference source not found.**). These methodologies are discussed further below:

Open Cut Trenching

2.4.6 It is anticipated that both bulldozers and conventional mechanical excavators will be utilised for open trenching (OT) extraction and topsoil stripping. The maximum machine size will not exceed 35 tonnes.

2.4.7 The excavated material will be placed alongside the trench within the working corridor. Material will be stored separately to ensure no mixing of sub and topsoil.

2.4.8 Within the highway, the trench will be approximately 1500mm wide, with the pipeline buried to a minimum depth of 900mm. Where the trench is to be installed in fields / non – highways land, the total trench width will vary from the 1500mm stated above. This variation will be to accommodate appropriate pipeline depths in steeped / inclined terrain.

2.4.9 De-watering of the trench will be required in some areas. De-watering and discharge of water will be carefully controlled to prevent the risk of sediment laden run-off entering watercourses and in accordance with Environmental Permitting regulations, where applicable.

2.4.10 The pipeline will be maneuvered into place (within the trench) using mechanical excavators.

2.4.11 Where possible, within non-highways land, the trench will be backfilled using the excavated material in reverse order to which it was excavated. In instances where ground conditions and contamination do not allow material re-use, appropriate disposal methods will be employed, and suitable imported material (i.e. imported granular material, 40mm maximum particle size), or soil stabilization will be used.

2.4.12 The trench will be backfilled with a surround of 1100 mm width and 800 mm depth.

2.4.13 Where the trench is laid within highways, Type 1 material will be imported and used to backfill the trench.

2.4.14 Habitats will be re-instated, re-seeded and re-planted as appropriate back to their original condition. Detailed, photographic records of condition will be taken across all areas of private land disturbed before any works take place, to ensure that there is a clear baseline to which they must be restored.

Trenchless Methodologies - Pipe Jacking

2.4.15 Pipe jacking is a technique for installing underground pipelines, ducts and culverts. Powerful hydraulic jacks are used to push specially designed concrete pipes through the ground behind a shield simultaneously as excavation is taking place within the shield.

2.4.16 In order to install a pipeline using this technique, launch and reception pits are constructed. Launch pits anticipated for this project will measure approximately 8m diameter with 10m depth, with reception pits measuring approximately 5m diameter and 10m depth.

2.4.17 The pipe is lowered into the launch pit in sections and jacked into place while excavated material is also removed from the launch pit.

2.4.18 Following installation of the pipe, the rig and equipment will be removed. The water pipeline will be inserted into the newly formed concrete tunnel, and the pits reinstated to their original condition.

Watercourse and River Crossings

2.4.19 It is currently proposed that 14 no. crossings will be undertaken via trenchless methodologies. These entail 4 no. railway crossings, 7 no. road crossings and 5-8 Main River crossings (subject to the final route chosen), as detailed within Tables 1 and 2 below.

2.4.20 In these locations, the pipeline will likely be installed using trenchless methodologies (i.e. pipe jacking) to minimise impact.

2.4.21 The watercourses will be crossed using either pipe jacking, as discussed above, or coffer damming methodology, with pipe flumes installed to allow for uninterrupted flow of water within the watercourse whilst allowing for the bed of the watercourse to be open-cut.

2.4.22 For all watercourse crossings, the relevant consents will be sought from the EA and the Lead Local Flood Authorities (LLFA) as required. This process will require a detailed construction methodology to be developed and agreed with the authorities ahead of consent being issued and works commencing.

2.4.23 Where crossing ditches and ordinary watercourses via trenchless methodologies, the pipeline will be laid to a minimum depth of 1000mm below the true clean bottom of the watercourse. Where crossing any rivers, the pipeline will be laid to a minimum depth of 1.5m below the bottom of the river in accordance with best practice methodologies.

Table 1: Main River Crossings (listed South to North)

EA Main River	Grid Reference	Construction Methodology	Local Planning Authority
River Thames	TQ 02500 71775 or TQ 02394 71812 (route dependent)	Trenchless	Runnymede District Council / Windsor and Maidenhead Council
County Ditch	TQ 02509 71797	Trenchless	Windsor and Maidenhead Council
County Ditch	TQ 02553 71829	Trenchless	Windsor and Maidenhead Council
County Ditch	TQ 02611 71919	Trenchless	Windsor and Maidenhead Council
County Ditch	TQ 02391 71855	Trenchless	Windsor and Maidenhead Council
County Ditch	TQ 02635 72262	Trenchless	Windsor and Maidenhead Council
	TQ 02707 72560 and TQ 02646 72485 (crosses at 2 points)	Trenchless	Spelthorne Borough Council
Wraysbury River	TQ 0273472902	Trenchless	Spelthorne Borough Council
Wraysbury River (connector to Colne)	TQ 02912 73646	Trenchless	Spelthorne Borough Council
Wraysbury River (connector to Colne)	TQ 04189 76338	Open Cut, pipeline to be laid in existing vehicle track (up to 1.2m depth)	London Borough of Hillingdon

Wraysbury River	TQ 04196 77019 / TQ 04145 76892 (dependent on route chosen)	Trenchless	London Borough of Hillingdon
Colne Brook	TQ 03637 77170	Open Cut	Slough Borough Council
Colne Brook	TQ 03108 77373	Trenchless	Slough Borough Council
Colne Brook	TQ 03657 77464	Trenchless	Slough Borough Council

Table 2: Ordinary Watercourse Crossings, listed South to North

Ordinary Watercourse / Other Waterbody	Grid Reference	Construction Methodology	Local Planning Authority
Queensmead Lake	TQ 02462 71994	Trenchless	Windsor and Maidenhead Council
Unnamed OW	TQ 02258 72374	Trenchless	Spelthorne Borough Council
Unnamed OW	TQ 03172 74530	Open Cut	Spelthorne Borough Council
Unnamed OW	TQ 03846 77140	Open Cut	Slough Borough Council
Unnamed OW	TQ 03296 77256	Trenchless	Slough Borough Council
Unnamed OW	TQ 03330 78086	Open Cut	Slough Borough Council
Unnamed OW	TQ 03406 78025	Open Cut	Slough Borough Council
Unnamed OW	TQ 04134 78706 / TQ 04134 78706 (dependent on route chosen)	Open Cut	Buckinghamshire Council
Unnamed OW	TQ 04231 79035 / TQ 04216 79061 (dependent on route chosen)	Open Cut	Buckinghamshire Council
Unnamed OW	TQ 04266 79258	Open Cut	Buckinghamshire Council

2.5 Construction Environmental Management

2.5.1 During detailed design, all efforts will be made to preserve as many trees as possible. Where hedgerows contain trees, their crossings will be reviewed in order to minimise or eliminate the requirement for removal where feasible. The total number of hedgerows requiring removal in order to facilitate the construction of the pipeline is yet to be determined, but hedgerows will be reinstated as appropriate in order to minimise arboricultural, landscape and ecological impact. Furthermore, where

hedgerows are to be removed, Hedgerow Removal Notices (HRNs) will be sought, where applicable, prior to the works commencing.

2.5.2 There may be the requirement for temporary lighting to facilitate construction. In this instance, mobile lighting will be situated along the access track, working corridor and in proximity to any temporary working compounds in order to allow workers to move around the site and undertake construction tasks in a safe manner.

2.5.3 Furthermore, dust pollution mitigation measures will comprise applying water to roads and work zones to suppress dust, and via installing vehicle wheel wash stations to prevent the spread of dust by washing the trucks when travelling from site to public highways.

2.5.4 When possible, the contractor will adopt hybrid technology to power plant and equipment, and will improve existing equipment by using particulate filters and catalytic converters. The contractor will brief the project team about the presence of residential properties in the area. All mitigation measures outlined in the Parent Construction Environmental Management Plan (CEMP) will be followed.

2.5.5 Noise pollution will be managed through following best practice methodologies. This will include using machinery within typical working hours, as discussed below, in addition to using modern, quieter machinery with noise-reduction technology, installing temporary sound barriers around high-noise areas. In order to maintain transparency, local communities will be informed about work schedules and anticipated noise levels.

2.6 Construction Programme

2.6.1 Construction of the proposed development is programmed to commence in April 2026 and is anticipated to last in total approximately 3-4 years. The programme will be phased so as to minimise construction time per location along the route. This timeframe is inclusive of construction site set up, installation of the main and connections to the existing networks, post-installation testing of the pipeline and reinstatement of the land following completion of the works.

2.6.2 Where possible, construction will be undertaken within typical working hours: Mon – Fri 8:00 – 6:00pm, with occasional weekend work. However, for safety and logistical purposes, 24-hour construction times will be required, notably where tunnelling under existing infrastructure is required,

2.7 Construction Management

2.7.1 AWL's standard procedures ensuring best practice, and industrial standards will be adhered to during the construction phase of the proposed development. A site team will oversee day-to-day activities on site. A dedicated customer liaison team will be available to discuss the scheme with residents of the local area.

2.7.2 AWL will have a dedicated page on their website to share information and updates for this project. AWL will use this page to engage with stakeholders throughout the project phases (inclusive but not limited to: set up, implementation and de-mobilisation).

2.8 Construction Traffic

2.8.1 During the construction process, it is anticipated that there will be several vehicles attending site per day, albeit the exact number is subject to confirmation. Construction vehicles will access the route from existing accesses and highways where possible in order to minimise impact on the surrounding environment and road network.

2.8.2 Vehicles necessary for the construction phase of development include cranes (required for shaft construction / pipe installation) and excavators (required for trenchless shafts and open cut pipeline).

2.8.3 During construction, excavated material will be moved along the working corridor by a dumper truck.

2.8.4 Construction materials and plant will be moved along the working strip. For instance, this is anticipated to include: shaft segments, pipe sections and bedding materials.

2.8.5 Once the trunk main has been installed and works are complete, it is anticipated that there will only be occasional visits to the area, for instance for routine maintenance work.

3 The Permitted Development Regulations

3.1 General Permitted Development Order

3.1.1 The Town and Country Planning (General Permitted Development) (England) Order 2015 (GPDO) details types of development which do not require a formal application to be submitted as planning permission is already granted by the Order. The specific types of development are detailed in Schedule 2 of the Order.

3.1.2 Whilst some types of development specified in Schedule 2 are relevant for any person or body undertaking the development, some Parts of Schedule 2 are only relevant to the stated bodies. Part 13, for example, is only relevant to Water and Sewerage undertakers, including drainage bodies and Environment Agency.

3.1.3 Part 13 Class A (Water Undertakers) of Schedule 2 within the GPDO states development permitted by the Order include:

"Development for the purposes of their undertaking by statutory undertakers for the supply of water or hydraulic power consisting of—

(a) development not above ground level required in connection with the supply of water or for conserving, redistributing or augmenting water resources…"

3.1.4 AWL is a water supply undertaker, as appointed under Section 6 of the Water Industry Act 1991, proposing to install an underground main. In view of this, the proposal is permitted development.

3.1.5 However, Regulation 3(10) of the GPDO states that:

"Schedule 1 development or Schedule 2 development within the meaning of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011(a) ("the EIA Regulations") is not permitted by this Order unless—

a) the local planning authority has adopted a screening opinion under regulation 5 of those Regulations that the development is not EIA development;…"

3.1.6 As such, it must be confirmed in writing by the relevant planning authority that the proposed development, is not EIA development and therefore can proceed under permitted development rights.

4 The Environmental Impact Assessment Regulations

4.1 Indicative EIA Screening Threshold

4.1.1 Schedule 1 development (as defined within the EIA Regs) requires EIA in any event as they are highly likely to have significant environmental impact.

4.1.2 The proposed development is not considered to be Schedule 1 development, as it does not match the definitions stated in Regulation 2(1) for either 'pipelines' or 'works for the transfer of water resources'.

4.1.3 Schedule 2 development is defined within the EIA Regs as, *"development, other than exempt development, of a description mentioned in column 1 of the table in Schedule 2 where –*

> *a) Any part of that development is to be carried out in a sensitive area; or*
>
> *b) Any applicable threshold or criterion in the corresponding part of column 2 of that table is respectively exceeded or met in relation to that development."*

4.1.4 Water mains, for the distribution of drinking water, are not directly referred to in Schedule 2 of the EIA Regs. Nevertheless, it is considered that the proposed development could be loosely defined under Schedule 2, Part 10(k) of the EIA regs which references pipeline installations; however specifically only for oil, gas and transport of carbon dioxide, or, Part 10(l) which includes *"installations of long-distance aqueducts".*

4.1.5 It should be noted that in the EIA Regs, an aqueduct is not defined; however, the GPDO does contain the definition that an aqueduct does not include for an underground conduit. Therefore, Part 10(l) of Schedule 2 of the EIA regs may not be applicable in this instance. However, if we consider the applicable threshold for a long-distance aqueduct, Column 2 states, *"The area of works exceeds 1 hectare".*

4.1.6 In addition to the thresholds stated in Column 2, guidance notes available for screening thresholds provide further indicative criteria and key issues to take into account when considering if the proposal is indeed EIA development. The guidance notes state indicative criteria and threshold for Part 10(l) of Schedule 2;

> *"Pipelines over 5 km long. Environmental Impact Assessment is unlikely to be required for pipelines laid underneath a road, or for those installed entirely by means of tunnelling";*

4.1.7 And key issues to consider for the same Part;

> *"For underground pipelines, the major impact will generally be the disruption to the surrounding ecosystems during construction, while for overground pipelines visual impact will be a key consideration".*

4.1.8 A *"sensitive area"* means any of the following—

a) "land notified under section 28(1) (sites of special scientific interest) of the Wildlife and Countryside Act 1981(23);

b) a National Park within the meaning of the National Parks and Access to the Countryside Act 1949(24);

c) the Broads(25);

d) a property appearing on the World Heritage List kept under article 11(2) of the 1972 UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage(26);

e) *a scheduled monument within the meaning of the Ancient Monuments and Archaeological Areas Act 1979(27);*

f) *an area of outstanding natural beauty designated as such by an order made by Natural England under section 82(1) (areas of outstanding natural beauty) of the Countryside and Rights of Way Act 2000(28) as confirmed by the Secretary of State;*

g) *a European site."*

4.1.9 The length of the pipeline exceeds 5km in length (with approximately 1.4km within carriageway) and a short section (circa 925m) of the development is proposed within a 'sensitive area' (Staines Moor SSSI).

4.1.10 The proposed development will be completely underground and installed through a combination of pipejacking (trenchless) and open cut methods. All land will be reinstated following completion of the works. Furthermore, where the proposed pipeline falls within the SSSI, the pipeline has been routed within a less ecologically sensitive area of the SSSI as agreed with NE, to the west of the SSSI along a disused railway line where habitat will be allowed to reestablish upon completion of the works.

4.1.11 Potential temporary impacts to surrounding ecosystems have been considered and mitigated as much as possible (further information is provided in subsequent sections of this request). As such, the proposed development is considered not to be EIA development.

5 Characteristics of the Development

5.1.1 Schedule 3 of the EIA Regs sets out the criteria for screening Schedule 2 development. The schedule is split into criteria covering the characteristics of development; the location and environmental sensitivity; and the type of characteristic of the potential impact.

5.2 Environmental Considerations

5.2.1 The following sections consider the development against elements of environmental considerations and assess the likely significant effects. For ease, the following sections are ordered according to the screening checklist provided by the Planning Inspectorate.

Natural Resources

5.2.2 The construction of the entire scheme is not expected to use a significant amount of natural resources. Where excavations are to be undertaken in order to install the pipeline (through a combination of open cut and trenchless methodologies), and where appropriate, top soil will be stripped and stored to be reinstated following completion of the works. Existing resources will be re-used where possible.

5.2.3 The proposed pipeline is located within several Mineral Safeguarding Areas (MSA). However, many of these areas are unsuitable for extraction through being either historic landfill sites, or important ecological sites which would be damaged if the minerals were extracted.

5.2.4 The northern section of the route falls within an MSA for Alluvium. However, this land is currently being used for agricultural purposes (Figure 2). Where the proposed route is within Surrey County Council, it falls within a mineral and waste site, in addition to an MSA (Figure 3). The active mineral and waste site has been accounted for as part of the engineering optioneering process, and relevant consultation with the landfill site responsible bodies is being undertaken as part of this project. The MSA also covers the Staines Moor SSSI, given the sensitive ecological nature of this designation, it is deemed unlikely that there would be a requirement for future mineral extraction within this location.

5.2.5 Part of the route is within an MSA for sand and gravel, as shown by the Central and Eastern Berkshire Joint Minerals & Waste Plan – Minerals Delivery Strategy (Central and Eastern Berkshire Joint Minerals and Waste Plan (adopted Nov 2022); Chapter 6, Page 67) and in Figure 4. Policy M2 of this plan (‘*Safeguarding sand and gravel resources*’) states that *“Sharp sand and gravel and soft sand resources of economic importance, and around active mineral works, are safeguarded against unnecessary sterilization by non-minerals development”.*

5.2.6 It is also discussed within Policy M2 that development within the MSA is considered with regard to *“the size and nature of the proposed development, the availability of alternative locations and the need for phasing of the proposed development”* . Further to this: *“Account…will be taken of the quantity and quality of the sand and gravel that could be recovered by prior extraction.”*

5.2.7 Where the route falls within this MSA, there is substantial residential and infrastructure development, in addition to Queensmead Lake. This land is therefore considered to be sterilized and unlikely to be used for future mineral extraction. Therefore, the proposed pipeline is not deemed to negatively impact the future ability to access natural resources (minerals) in this location.

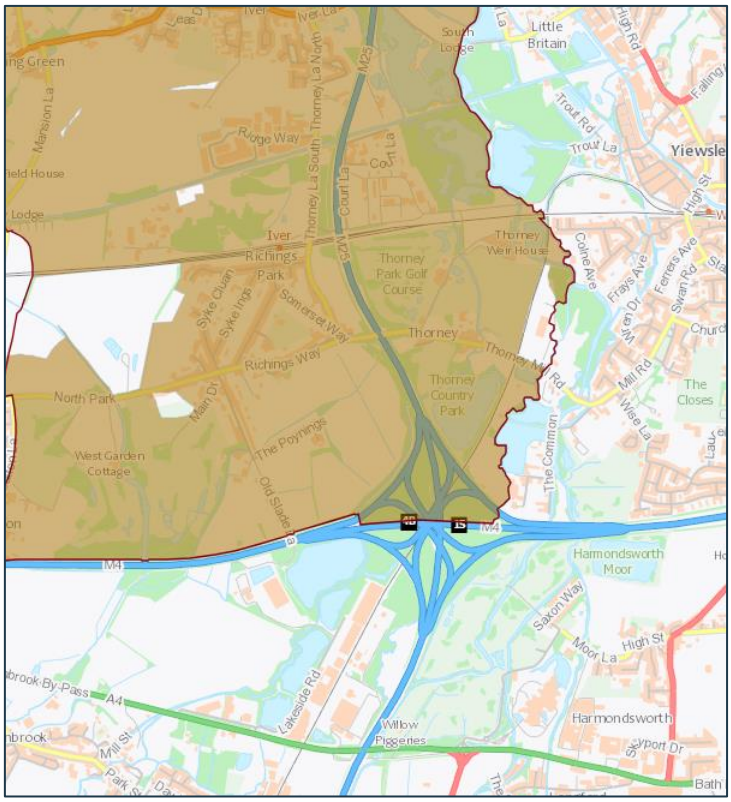

Figure 2: Mineral Safeguarding Area for Alluvium (https://buckscouncil.maps.arcgis.com)

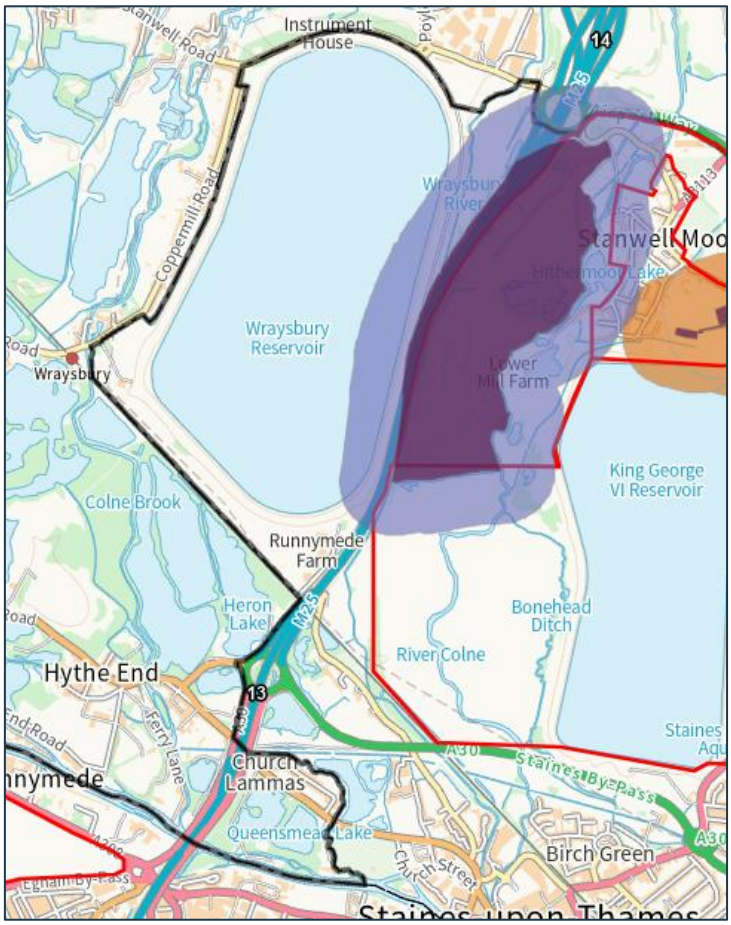

Figure 3: Mineral Safeguarding Areas (red), existing mineral and waste sites (purple) (https://surreycc.maps.arcgis.com)

Figure 4: Mineral Safeguarding Area (hashed area) (JMWP-Policies-Map.pdf)

Waste

5.2.8 The proposed pipeline will be installed largely by open cut, with sections of trenchless methodologies (pipejacking and microtunelling). Spoil and arisings will be reinstated following construction (where possible). It is therefore not anticipated that there will be significant generation of solid wastes. Furthermore, where feasible, excavated material will not be removed from the site. Upon reinstatement of the land, excavated materials will be distributed across the full working strip and land will be seeded or finished in line with landowners' agreement.

5.2.9 However, some areas of the working corridor will not be suitable for re-grading and the excavated material will not be suitable for reuse. Therefore, there will be some element of excavated material removed from the Site and processed appropriately in accordance with AWL's waste management systems.

5.2.10 Should any surplus material and waste be generated by the proposed scheme, this will be dealt with in the accordance with the waste hierarchy. Where waste materials are generated and cannot be re-used or recycled, it is expected that wastes would be sent off site for disposal to landfill. in the case that waste material is required to be removed from Site, this will be governed under The Waste (England and Wales) Regulations 2011. Given the works are within historic landfills, it is considered that contaminated soils will be encountered during construction. Contaminated soils will be removed and disposed of in accordance with the regulations stated above and not re-used on site.

5.2.11 The route runs through nine Historic Landfill Sites (ordered from North to South):

- Three Valleys Water
- Richings Park Landfill
- St Albans Sand and Gravel Company Limited
- Tanhouse Farm No.1
- Accommodation Lane West
- South of Old Bath Road 2
- Horton Road
- Hithermoor Farm Area C
- Hithermoor Farm - Landfill taking Non-Biodegradable Wastes

5.2.12 In addition, the proposed route is adjacent to:

- South of Old Bath Road No. 1
- Church Lammas Landfill

5.2.13 Furthermore, liaison with the Environment Agency (EA) will be undertaken prior to any works to within these sites in order to discuss the programme of works and specific requirements in relation to working within and near landfills.

Pollution and Nuisances

5.2.14 Construction will not require extensive use of noxious, toxic or hazardous chemicals or substances. All potentially hazardous substances used during construction will be closely managed on site, with all operators following standard COSHH regulations, health and safety guidelines and trained in spill control measures. As such, it is highly unlikely that construction will cause any significant pollution events.

5.2.15 During operation, if the main were to rupture or burst, the treated (chlorinated) water being transferred would not be considered a pollutant. Therefore, the installation of the pipeline is not expected to release pollutants or any hazardous / toxic noxious substances into the air specifically.

5.2.16 Construction works have the potential to result in temporary noise and vibration impacts, due to plant use and construction vehicle movements. However, these will be localised and temporary in nature. Best practice methods relating to site management will be implemented during construction, such as all site vehicles and machinery being turned off when not in use so as to minimise noise disruption.

5.2.17 Nuisance to local residents and road users is likely to be limited to during the construction of the pipeline and, particularly for local residents, only noticeable when construction is in proximity to their location. Working methods and plant movements will be programmed during standard working hours where possible so as to avoid causing significant noise or disruption during outside of standard working hours.

5.2.18 Furthermore, compared to alternative routes (Options 1 and 2) explored for the location of this pipeline (see section 2.3), the chosen route, Option 3 is deemed the least impactful to local residents and road users. It has been designed so as to minimise the number of road / PRoW closures and subsequent diversions as well as being located away from residential areas where possible.

5.2.19 Prior to works commencing, liaison will be undertaken with appropriate highways authorities to secure temporary road closures (where required) and the phasing of the project will be governed by this. The routing of the project has been designed so

as to minimise the necessity for road closures. However, where necessary, the closure of more major roads will aim to be undertaken during school holidays where possible, in order to minimise disruption to road users. Liaison will be undertaken by a dedicated liaison team with landowners and local residents regarding the project in order to address any questions or queries that arise throughout the project programme.

5.2.20 Engagement will also be undertaken throughout the project with local MPs, councilors and the local press. Correspondence undertaken with these stakeholders will refer them to AWL's dedicated project webpage.

5.2.21 Therefore, it is considered that this development will not generate significant permanent nuisance to the public.

Population and Human Health

5.2.22 Notwithstanding the operational benefits that this proposed development would bring to the local community through enhancement of AWL's ability to provide a resilient drinking water supply network, the construction of this infrastructure is not anticipated to have an adverse impact on the human population.

5.2.23 Whilst every care will be taken to avoid any accidents, and risks will be assessed and avoided where possible, there is a small risk that accidents may occur during the construction and operational phases of the project. Skilled construction workers and operational contractors from AWL's approved list will form an appropriately skilled workforce who will undertake the works, thereby minimising the likelihood of any accidents.

5.2.24 The proposed development itself will not have any direct impact on the health of the local population. However, potential indirect impacts to human health may occur through the increase in traffic, especially of diesel – powered heavy goods vehicles. Although, these are not expected to be significant or for a long duration.

Water Resources

5.2.25 The trunk main is proposed mostly within Flood Zone (FZ) 1 however it is also proposed within areas of Flood Zone 2 and 3. It is acknowledged that these are areas of land having between a 1% and 0.1% annual probability of river flooding (FZ 2) and land having a 1% or greater annual probability of river flooding (FZ 3). Where possible, works within these areas will be timed to take place within drier months of the year. Furthermore, temporary compounds and trenchless drilling reception pits will be strategically situated in order to avoid FZ2 and 3 where possible.

5.2.26 The proposed pipeline is classed as 'water-compatible development' under 'water transmission infrastructure and pumping stations', as per Annex 3: Flood risk vulnerability classification[2]. As per government guidance, water-compatible development is considered appropriate development within FZs 1, 2 and 3. Furthermore, with the mitigation measures (as discussed above) in place, it is considered that the works do not pose a risk to flooding.

5.2.27 The development is proposed to cross EA Main Rivers at approximately 15-17 points (dependent on route alignment) and make 10 no. ordinary watercourse crossings (see Table 1 and Table 2). It is also acknowledged that the proposed pipeline runs in proximity to multiple other waterbodies, beyond those discussed above.

5.2.28 Where the proposed pipeline route crosses EA Main Rivers, Flood Risk Activity Permits (FRAPs) or FRAP exemptions (where applicable) will be sought, in addition to Ordinary Watercourse Consent where the route crosses ordinary watercourses.

[2] National Planning Policy Framework - Annex 3: Flood risk vulnerability classification - Guidance - GOV.UK

5.2.29 Where possible, the pipeline will be installed beneath watercourses via a trenchless drilling method, as such there will be no likely impact upon the water quality, or the morphology of the watercourses. Where it is not possible to install the pipeline beneath watercourses via trenchless methods, best practice methods will be followed to ensure any potential risk to water quality is mitigated as far as possible (see Table 1 and Table 2 for proposed watercourse crossings and methodologies).

5.2.30 Overall, there will be no increase in flood risk from the watercourses for third parties during construction or operation of the development.

5.2.31 Furthermore, throughout the construction programme, caution will be taken so as to avoid pollution and / or waste entering any waterbodies that are in proximity to the proposed development.

Ecology and Biodiversity

Designated sites

5.2.32 Multiple designated sites including SSSIs, SNCIs, priority habitats and ancient woodland fall within or within close proximity to the route.

5.2.33 Particularly, a section of the route (circa 1 km) is located within 'Staines Moor' SSSI. Staines Moor is designated for its alluvial meadows which support a rich flora as well as supporting nationally important population of wintering wildfowl. The main body of the SSSI comprises of unimproved grassland, which has experienced long periods of continuous grazing management with minimal disturbance of underlying soils and substrate. Furthermore, the soils and underlying alluvium substrate have a strong influence on the vegetation forming the grassland at Staines Moor, both in terms of hydrology and composition.

5.2.34 Consultation with Natural England has been undertaken to assist in informing routing options and methodologies to mitigate for potential impact to the SSSI's designated features. On the west side of the SSSI, along the disused railway, the soils and vegetation have a very different nature. As set out by Natural England, *"the disused railway line represents a route through the SSSI which has been subject to historical disturbance [and therefore] impacts of excavation here would be more readily mitigated and the prospects for restoration of the habitat more readily achievable".*

5.2.35 As discussed in section 2.3 of this report 'Alternative Proposals', extensive route optioneering has been undertaken to try and avoid the route passing through the SSSI. However, the only other route option would be along the M25 which is not deemed a feasible option due to the disruption this would cause and potential future maintenance requirements. Another option was explored to locate the pipeline closer to the reservoirs, however this was not deemed feasible from an engineering perspective as there are existing utilities located between the reservoirs and therefore it was not possible to achieve a safe working width in this location. Furthermore, installing the pipeline in close proximity to the existing reservoirs would have the potential to disturb the integrity of the reservoirs' structures.

5.2.36 The route falls within close proximity to South West London Waterbodies SPA and Ramsar 0.2km west designated for wintering birds and Windsor Forest and Great Park SAC designated for its woodlands and the violet click beetle. From initial discussion with NE, they stated *"that the risk of potential impacts on birds utilising the South West Waterbodies SPA from disturbance during construction is likely to be very low given the distance from the water bodies and the amount of noisy activity in the local area."*

5.2.37 Further surveys were undertaken for wintering and breeding birds to assess potential impact to the SPA and Ramsar designated features. The Winter and

Breeding Bird Survey Report (TT4103-Iver to Egham-WBS BBS-R01-Rev00) concluded the following with regard to impact to the SPA, Ramsar and SSSI;

> *"The proposal is to construct a pipeline (c13 km) which will be constructed using a combination of trenched and trenchless methods. The works will therefore result in impacts that are short-term (one breeding / one winter season only) and reversible (cut and fill will be subject to natural regeneration, resealing of hard surfaces, or continued agricultural production. Where utilised, laydown and ancillary areas will also be subject to the same conditions). In addition, the planned pipeline route runs adjacent to the M25 Motorway, under the London Heathrow Airport Flightpath, under the M4 Motorway and through heavily disturbed residential, commercial, and industrial sites throughout and so indirect impacts as a result of visual disturbance, noise or vibration are not anticipated due to the existing high level of disturbance.*
>
> *Short-term and reversible impacts should however still be considered within their context of significant adverse impacts on designated sites and their qualifying features. In respect of this project there are no significant populations of the SPA and Ramsar site qualifying features utilising the site and irrespective of whether appropriate mitigation is applied it is not possible for the proposed works to result in a significant adverse impact. It is therefore certain that the proposed works will not result in a significant adverse impact on qualifying features of these designated sites. Survey records within the Staines Moor SSSI of wintering Short-eared Owl and breeding Meadow Pipit are both vulnerable to disturbance from the proposed works in their respective seasons.*
>
> *Works will, where possible, avoid linear habitat features (e.g. hedgerows) and any hedgerow breaches will be short (working width assumed to be between 20 and 30m). The works will also directly impact terrestrial arable and grassland habitats over the working width as well as in laydown areas. The breeding bird assemblage is likely to be valued at a local level only and the limited direct impacts that are short-term and reversible (hedgerows will be reinstated and habitats subject to natural regeneration or continued agricultural production) are not considered to be significant."*

5.2.38 In addition to the statutory designations, the route also falls within four Sites of Importance for Nature Conservation (SINC / SNCI) and in proximity to 13 SINC / SNCIs, two Local Wildlife Sites (LWS), in addition to sections of Ancient Woodland and priority habitats.

5.2.39 A full list of designated sites and their proximity to the route are listed in Appendix 1.

Preliminary Ecological Appraisal

5.2.40 A Preliminary Ecological Appraisal (PEA) was undertaken in September – October 2024 of the route a 60m buffer where access was possible.

5.2.41 The following habitats were recorded within or immediately surrounding the route;

- Grassland; Neutral grassland (g3), Lowland meadow (g3a), Other neutral grassland (g3c), Modified grassland (g4);
- Woodland and forest; Wet woodland (w1d), Lowland mixed deciduous woodland (w1f), Other broadleaved woodland (w1g), Other woodland mixed (w1h);
- Hedgerow; Species rich native hedgerow (h2a5), Other native hedgerow (h2a6), Non-native and ornamental hedgerow (h2b);
- Aquatic marginal vegetation (f2d);

- Heath and scrub; Blackthorn scrub (h3a), Bramble scrub (h3d), Mixed scrub (h3h);
- Arable; Cereal crops (c1c);
- Urban; Built-up areas and gardens (u1), Developed land; sealed surface (u1b), Other developed land (u1b6), Artificial unvegetated, unsealed surface (u1c), Built linear features (u1e), Sparsely vegetated land (s);
- River; Standing open water and canals (r1), Other standing water (r1g), Other rivers and streams (r2b).

5.2.42 Habitats present within and in proximity to the route are deemed to be suitable for a range of protected species, including; invertebrates, fish (bullhead), amphibians, reptiles, birds (nesting, ground nesting, and wintering birds), bats, hazel dormouse, badger, water vole, and otter.

5.2.43 Habitat clearance will be kept to the minimum required and allowed to re-establish upon completion.

5.2.44 Watercourses will be subject to trenchless crossings with suitable buffer from the bank top in place, therefore no impact to fish, water vole, or otter is anticipated.

5.2.45 Further surveys were recommended for the following protected species; wintering and breeding birds, botanical surveys, bats, great crested newts, hazel dormouse, and badger. See below details of surveys and findings.

Further surveys

The Below

5.2.46 Table 4 summarises phase 2 ecological surveys that have been undertaken to date to inform this project.

Table 3 Summary of findings from phase 2 ecological surveys

Survey / date	Summary of findings
Wintering Bird (Winter 2024/25)	Wintering bird surveys were completed during winter 2025 and comprised a total of seven survey visits, each survey visit approximately 2 weeks apart and consisting of a paired nocturnal (one hour post-sunset) and diurnal survey (around sunrise). Survey methodology is based on the Bird Survey Guidelines for Ecological Impact Assessment. All birds seen or heard during each visit were recorded onto field maps, and attention was given to identifying the presence of specially protected and nationally declining bird species, including species listed on SPA designations (e.g. wildfowl and waders). Nocturnal survey effort was enhanced through the use of a Pulsar Axion 2 XG35 thermal imaging camera to improve the detection of birds at night. Of the species included as qualifying feature species on the SPA and Ramsar criteria for wintering populations on the West London Reservoirs, Gadwall and Shoveler were recorded but did not reach 1% of the designated site population. Furthermore, of the non-qualifying feature species, Pochard, Tufted Duck, Coot, Great Crested Grebe, and Cormorant were recorded but again did not reach 1% of designated site populations. Therefore the project area was determined to not represent Functionally Linked Land (FLL) for these designated sites. Of species mentioned in the Staines Moor SSSI citation, only two birds of each Wigeon and Teal species, and one Short-eared Owl

	were recorded, which does not represent a significant proportion of the SSSI citation of "up to six birds". *(Doc ref: Iver to Egham Pipeline Route, Winter and Breeding Bird Survey Report, July 2025)*
Botanical scoping (March 2025)	In order to inform design and consultation with Natural England, a botanical scoping survey was undertaken by Josh Styles FISC Level 6 in March 2025. The pipeline plus a 60m buffer, where access was possible, was surveyed. As part of this assessment, a desk study was undertaken utilising aerial imagery, magic maps, British Geological Society data, and data from Botanical Society of Britain and Ireland. A range of actual or potential IFFs were noted across the route. *(Doc ref: 099-01_Iver-Egham Pipeline_Botanical Scoping Survey_Technical Note-**CONFIDENTIAL**)*
Breeding bird (April-June 2025)	A total of 5 surveys were undertaken, each survey visit separated by two to three weeks and surveys commencing within 1 hour of sunrise. Survey methodology is based on the Bird Survey Guidelines for Ecological Impact Assessment. All birds seen or heard during each visit were recorded onto field maps, and attention was given to identifying the presence of specially protected and nationally declining bird species. Breeding bird status was confirmed using assessment against the European Ornithological Atlas Committee (EOAC) criteria, and defined as: Confirmed Breeding (C), Probably Breeding (PR), Possible Breeding (PB) and Non-breeding (NB). A number of Red and Amber List species of Conservation Concern were recorded during the breeding bird surveys. Of the species mentioned within the citation for Staines Moor SSSI, only Meadow Pipit (breeding period) were recorded within the boundary of the SSSI. Overall, the breeding bird assemblage is assessed as being of Local value only. Mitigation methods will be implanted such as minimising temporary habitat loss, removing any hedgerow outside of bird nesting season. Working areas will be clearly defined, and terrestrial habitats kept short following vegetation removal to discourage use by nesting birds. If this is not possible, a suitably qualified ecologist will be present to check for nesting birds / active nests. *(Doc ref: Iver to Egham Pipeline Route, Winter and Breeding Bird Survey Report, July 2025)*
Ground Level Tree Assessment (April 2025)	A total of 249 individual or group of trees were highlighted by the tree report as being located within the 30m buffer of the route. A scoping assessment was undertaken to identify tree/groups where impact could be avoided during construction resulting in 44 trees or groups assessed during the GLTA. PRF-I; 27 trees were assessed as having features only suitable for individual or a small number of roosting bats. PRF-M; 8 trees were assessed as having features suitable for multiple roosting bats. The results of this survey will be used to inform detailed design and working methodologies. Where trees cannot be avoided, PRF-I's will be subject to sensitive felling, PRF-M's will be subject to further surveys. It is advised bat boxes are installed, in agreement with landowners, and trees replaced with native species of local provenance.

	(Doc ref: Joanna Graham Ecology Ltd GLTA Iver to Egham JGE07724)
Hazel Dormouse (April 2025 – September 2025)	Areas of woodland, hedgerow, and dense scrub were identified along the route, as well as the presence of hazel dormouse nesting tubes. Tubes were installed in March/April 2025. Surveys were undertaken between April and September 2025, and no hazel dormice presence was found. *(Doc ref: Joanna Graham Ecology Ltd Hazel Dormouse Survey Iver to Egham JGE07724)*
Great Crested Newt HSI/eDNA (April-May 2025)	36 waterbodies were located using an OS base map, unsuitable water bodies such as fishing lakes and large reservoirs associated with high numbers of waterfowl were removed from the survey scope. 12 ponds were therefore subject to HSI and 11 to eDNA surveys. Four returned an indeterminate result likely due to proximately to the quarry causing direct/indirect pollution. Severn ponds returned a negative result. Although presence of GCN cannot be entirely ruled out, the combination of negative results and lack of records reduces the risk of impact. A non-licenced method statement (NLMS) / precautionary method of works (PMoW) is advised. *(Doc ref: Joanna Graham Ecology Ltd eDNA Letter Iver JGE07724)*
PEA re-survey of amended sections (summer 2025)	Due to amendments to the route since the first PEA survey (undertaken September to October 2024), additional PEA surveys have been undertaken to capture further ecological data. Areas covered within the re-survey included the proposed route to the west of Staines Moor SSSI.
Bat – emergence survey or tree climbing inspection (as required)	To be undertaken, if required, on trees assessed as PRF-M where they cannot be avoided during detailed design. Up to three surveys are required on each tree between May and September, with two surveys between May and August, a minimum of three weeks apart.
Badger (pre-commencement)	Historic records indicated potential badger presence in the wider area. One mammal hole was noted during the PEA, although not confirmed badger or sign of current use. An updated walkover of the route will be undertaken prior to any works due to the mobile nature of the species.

Landscape and Visual

5.2.47 The proposed trunk main is partially located within London Green Belt and Colne Valley Regional Park, in addition to being within proximity of the 'Thorney Park' Country Park (located approximately 130m east of the route).

5.2.48 The proposed works are within the National Character Area (NCA) 115: Thames Valley. This NCA runs through Slough, Windsor, the Colne Valley and the southwest London fringes. Across the pipeline route, the area is congested through development, including motorways, rail links and important link roads (notably the M4, M40, M25 and the Paddington Main Line). It is also characterised primarily by hydraulic features, such as the River Thames and its tributaries, reservoirs and lakes which act as an additional constraint to further development. The area is suburban in character and significant development is visible throughout, including the presence of Heathrow Airport, the UK's busiest airport, and infrastructure networks set out above. Smaller-scale development is also apparent in this location. A list of recent and relevant planning applications and EIA SORs is provided in Appendix 2.

5.2.49 More locally, there are pockets of countryside and green space, where habitats are typically unmanaged grassland, dense scrub and lines of tree and hedgerow. Some of these areas are open space, formal play space and registered common land (Staines Moor and Staines Lammas). There are established residential areas and associated gardens, as well as pockets of equestrian paddocks and farmland. There are areas of land which are allocated for development – both residential and employment / business land. Active waste and historic waste sites are also present, as previously described.

5.2.50 The pipeline is to be installed underground, therefore there will be no permanent landscape and visual impacts to the area following completion of the works. During construction there will be temporary visual impacts to the surrounding landscape, however these visual impacts would be only for the duration of the works, and upon completion, land will be fully reinstated to its previous condition. Furthermore, the construction is to be restricted to the working width and, where possible, construction works are to be phased, and land will be in the main reinstated (with retention of accessways) in order to minimise visual impact during the whole project.

5.2.51 The southern portion of the route is the only section that falls immediately adjacent to residential properties (specifically Wraysbury Road and Lammas Drive). Although the works would be visible to these residents and other road users during construction, this would only be temporary, and all areas reinstated to pre-works condition following completion of the works.

5.2.52 During operation, the pipeline would not be intrusive to the local landscape as the pipeline is to be installed underground therefore the only evidence of the works will be small manhole covers and marker posts at points along the route.

5.2.53 Construction will require the use of plant and machinery including excavators and drilling rigs and areas for storage of materials which will be temporarily visible across some areas. However, these will only be visible for the duration of construction.

5.2.54 Impacts upon the visual landscape will be limited to the construction period. The only visible permanent evidence of the construction will be elements flush to the ground (i.e. manhole covers, and insignificant in the landscape (i.e. marker posts). Given the limited duration and temporary nature of landscape and visual impacts potentially caused by the pipeline, there would be no permanent significant landscape impacts as a result of the development.

Cultural Heritage and Archaeology

5.2.55 An Archaeological Desk Based Assessment has been completed in order to support the route optioneering process. This was undertaken by DM in November 2024 and identified that the route does not physically impact any Designated heritage assets recorded by Historic England ‘the List’.

5.2.56 The DBA identified the above-ground Designated assets in close proximity to the works as comprising two Listed Buildings within 100m of the route, and the Staines Conservation Area (CA) located approximately 228m from the route. It was determined that given the works are to be installed underground, any impact upon the setting of these assets would be temporary in nature and for provision to be made for reinstatement on completion of the works. As such, a formal Heritage Impact Assessment is not included.

5.2.57 Furthermore, the Scheduled Monument ‘Two concentric ditches showing as crop marks at Thorney’ along with potential associated archaeological remains, lies within 50m of the northern extent of the route and has been taken into consideration throughout optioneering and detailed design.

5.2.58 Six non-deingnated assets were identified to be within, or directly adjacent to the optioneering Routes, as such, recommendations were made for the route to be refined in consideration of these, and as further assessment regarding the archaeological potential of the proposed pipeline route, a geophysical survey was completed on areas accessible and suitable for survey. The desk-based assessment and geophysical survey has been disseminated to the relevant council archaeological advisors to inform upon their consultee responses.

5.2.59 Consultation is being maintained with key stakeholders (Buckinghamshire County Archaeologist Surrey County Archaeologist, Berkshire County Archaeology Service and the Greater London Archaeology Advisory Service (GLAAS) and Historic England) to determine any further proportionate evaluation or mitigation, if required, in response to the data gathered and potential impact from the proposals.

5.2.60 Through this consultation proportionate archaeological mitigation is being implemented during intrusive Site Investigation works and this will be disseminated to all stakeholders as the first phase of intrusive archaeological works.

Transport and Access

5.2.61 As the proposed route is yet to be finalized, access arrangements and construction vehicle routings are yet to be determined. Where feasible, construction traffic will utilise the existing road network and existing access points to reach the working corridor and any site compounds. To enable initial site set-up, the contractors' equipment will be delivered to site, including delivery of materials e.g. pipe.

5.2.62 During construction works, vehicle movements will be spread along the pipeline route. On a daily basis, light vehicles will be used as transport for workforce. Occasionally during construction, vehicle deliveries of construction materials will be required at various locations along the pipeline route.

5.2.63 A traffic management plan will be produced to outline routes for construction traffic and any relevant weight and time restrictions for the traffic. With this plan in place, and liaison with the local highway authorities, it is not anticipated that this number of vehicles will have a significant impact on daily traffic within the surrounding area.

5.2.64 Following completion of the pipeline construction, there will be no regular additional vehicle movements as a result of the proposals. Infrequent visits will be required by maintenance personnel to attend sections of the Site for inspection and repair (if necessary), however, this would only require attendance of a small van. As such, the impact of this on the surrounding road network is deemed to be negligible.

Land Use

5.2.65 The proposed land for development currently consists primarily of agricultural and amenity land, roads within residential areas, beneath railway and within areas of AWL operational land.

5.2.66 Much of the land that the trunk main route intersects is classified as non-agricultural or urban land, however, the route also sits within areas of Grade 1 (Excellent Quality) and Grade 3 (Good to Moderate) Agricultural Land. However, it is considered that these areas are intersected with road, rail and residential / commercial development. Furthermore, given the nature of the proposed development being for an underground pipeline, the permanent use of this land will not be impacted and will still be utilised for agricultural purposes, where applicable.

5.2.67 Therefore, the potential impact of this land in the locations where the pipeline is to be installed is considered low.

Land Stability and Climate

5.2.68 The route and its surroundings are not known to be susceptible to earthquakes, subsidence, landslides, erosion or extreme weather conditions. The climate of the location is similar to the wider south of England.

5.2.69 Boreholes and soil sampling will be carried out across the route to determine the suitability of the soils and assess ground risks prior finalising engineering of the route. Temporary works shall be specifically designed for each area of adverse working and will specify access, benching (to create a flat platform on which to work), ground stabilisation, water runoff management and reinstatement.

5.2.70 To reduce potential damage to soil structure, topsoil movements will be limited, where possible, to when conditions are considered suitable, typically between the months of April and October, when the soils are relatively dry. However, given the water environment of sections of the Site, where surface water flooding is experienced for large periods of the year, it is acknowledged that limiting vehicle movements to drier months may not be wholly possible.

5.2.71 There will be segregation of topsoil and subsoil during stripping and storing and reinstatement to restore to pre-existing characteristics, land cover and drainage patterns.

5.2.72 The nature of the development as an essential water compatible development to provide potable water supply from Egham WTW to Iver WTW will contribute to overall efforts to increase water security in the face of climate change. The route has been chosen as it is shorter and more direct as well as lesser environmental impact and therefore, will equate to fewer carbon equivalent emissions than other explored options (discussed in section 2.3).

Cumulative and Transboundary Effects

5.2.73 Given the nature of the proposed pipeline being wholly underground, it is considered that cumulative impacts would only be for the duration of the construction works, and once the pipeline is operational and land reinstated, impacts would be negligible.

5.2.74 A search of planning history along the proposed route has identified there to be several applications that may pose cumulative effects with the proposed pipeline from Egham to Iver. Full details of recent applications within close proximity to the pipeline that have potential to have additional impact are set out in Appendix 1.

5.2.75 Although construction timescales are not known for the developments listed below, there may be cumulative impacts in terms of noise, dust and air pollution generation, should these projects be undertaken within similar timescales to the proposed Egham to Iver pipeline. Upon completion of construction, however, there would be no cumulative impact anticipated, due to the works being underground and only occasional monitoring checks required along the pipeline.

6 Conclusions

6.1.1 The development can be considered to fall under Schedule 2 of the EIA Regulations under Class 10(l). As the pipeline exceeds 5km and 1ha in size, and is situated within a 'sensitive area', a screening opinion is required from the relevant authority to confirm whether the development is deemed to be non-EIA development. As outlined within this report the proposal will not have significant effects on the environment by virtue of its characteristics or location and therefore the development is non-EIA development.

6.1.2 This formal screening request has been made to Spelthorne Borough Council as the determining authority, with Runnymede District Council, Windsor and Maidenhead Council, Hillingdon London Borough Council, Slough Borough Council and Buckinghamshire Council also being consulted as part of the EIA SOR process.

6.1.3 The request is in relation to the proposed installation of a circa 12km clean water pipeline from Egham WTW at the south to Iver WTW at the north. This request is made under Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The information included within this report is deemed to satisfy the requirements as outlined within Regulation 6 of the EIA Regulations.

6.1.4 Planning Practice Guidance suggests that EIA should only apply to projects which are likely to have significant effects on the environment. This report demonstrates the limited sensitive residential, environmental and historical receptors in proximity to the Site and that the proposals, though considerate design and mitigation, will not result in any significant effects on the environment. Therefore, whilst the proposals can be considered to constitute Schedule 2 development, it is considered that they do not constitute EIA development.

6.1.5 Consequently, it is respectfully requested that the determining planning authority respond formally with the opinion that the proposals constitute non-EIA development.

Appendix 1 Ecological sites within proximity to the proposed works

Table 4 4: Designated ecological sites within proximity to the proposed works.

Designated Ecological Sites		
Name	**Designation**	**Approximate Location (at closest point)**
Staines Moor	SSSI	Onsite
Wraysbury Reservoir	SSSI	0.2km W
South West London Waterbodies	SPA, Ramsar	0.2km W, 0.6km E
Wraysbury and Hythe End Gravel Pits	SSSI	0.4km NW
Langham Pond	SSSI	1.5km W
Arthur Jacob Nature Reserve	LNR	1.6km NW
Thorpe Hay Meadow	SSSI	1.6km S
Thorpe Park No.1 Gravel Pit	SSSI	3.0km S
Windsor Forest and Great Park	SAC, SSSI	3.7km W
Riverside Walk, Virginia Water	LNR	4.5km E
Black Park	SSSI, LNR	4.7km NW
Kingcup Meadows and Oldhouse Woods	SSSI	4.8km N
Bedfont Lakes	LNR	4.8km E

Table 5: Non - Designated Ecological Sites within proximity to the proposed works.

Non- Designated Ecological Sites		
Name	**Designation**	**Approximate Location (at closest point)**
River Thames - Runnymede	SNCI	Onsite
Hilda May Lake	SNCI	Onsite
Lower Colne	SINC	Onsite
Ancient and semi-natural woodland	Ancient and semi-natural woodland	Onsite
Priority habitat – pond	S41 NERC	Onsite
Greenham's Fishing Pond	SNCI	Onsite

Non- Designated Ecological Sites		
Name	**Designation**	**Approximate Location (at closest point)**
Priority habitat – lowland meadow	S41 NERC	Onsite
Priority Habitat – good quality semi-improved grassland (non-priority)	S41 NERC	Onsite
Colne Valley Gravel Pits and Reservoirs	BOA	Onsite
Priority habitat – lowland dry acid grassland	S41 NERC	Onsite
Colne Valley	BOA	Onsite
Priority habitat – deciduous woodland	S41 NERC	Onsite and adjacent
Priority Habitat – deciduous woodland	S41 NERC	Onsite and adjacent
Priority habitat – deciduous woodland	S41 NERC	Onsite and adjacent
Priority Habitat – deciduous woodland	S41 NERC	Onsite and adjacent
Church Lammas	SNCI	Adjacent N
Opposite Iver Station	BNS	0.05km W
Old Slade Lake	BLWS	0.06km N
Moor Lane Nature Reserve	SNCI	0.1km NW
Reedbeds	S41 NERC	0.12km E
River	S41 NERC	0.18km E
River Colne (from County Boundary to Staines moor), Stanwell Moor	SNCI	0.2km E
Wraysbury Reservoir SNCI	SNCI	0.2km W
East of Poyle Meadows	SNCI	0.2km W
Ancient and semi-natural woodland	Ancient and semi-natural woodland	0.21km W
Chandos Road	CV	0.25km SE
River Thames – Spelthorne	SNCI	0.3km E
Little Britain	SINC	0.4km E
Grand Union Canal, Slough Branch	BNS	0.4km N
Grand Union Canal, near Iver North	BNS	0.4km N

Non- Designated Ecological Sites		
Name	**Designation**	**Approximate Location (at closest point)**
Waste of Poyle Meadows	SNCI	0.4km W
Runnymede (including Cooper's Hill and Cooper's Hill Slopes)	SNCI	0.6km W
Wraysbury II Gravel Pits	BLWS	0.6km W
Birch Green by River Ash	SNCI	0.8km SE
London Canals	SINC	1.5km E
Stanwell II	SNCI	1.6km E

Appendix 2 – Relevant Planning History

Spelthorne Borough Council

PLAN N/FUL/74/217 – Land West of Hithermoor Road Staines Surrey TW19 6AZ - Temporary Crushing Plant.

PLAN N/SCC/80/122 - Scheme A - Staines Moor off Moor Lane Staines - The extraction of sand and gravel, refilling with Class I Materials and Restoration of 58 Hectares.

PLAN N/CON/80/121 - Scheme B - Staines Moor off Moor Lane Staines - The Extraction of sand and gravel, refilling with Class I Materials and Restoration of 51 hectares.

24/00192/SCC - Land At Oak Leaf Farm Horton Road Stanwell Moor Staines-upon-Thames TW19 6AQ - The continued operation of a depot for the importation, storage and treatment (screening) of utility waste arisings, comprising non-hazardous, inert excavated spoil from gas main replacement operations, which is for re-use; including the retention of ancillary infrastructure comprising offices, welfare facilities, storage bays, container storage, diesel storage, parking, lighting and perimeter fencing and the installation of a weighbridge [retrospective]. SCC ref 2024-0018.

Of the above, none of these applications were made or decided within the last 2 years. It is therefore considered that there is likely no cumulative impact.

Windsor and Maidenhead Borough Council

24/02253/EIASCO- Fowles Crushed Concrete Hythe End Farm Hythe End Road Wraysbury Staines TW19 5AW- EIA Scoping Opinion Request letter and supporting EIA Scoping Report under Regulation 15 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in respect of the proposal for an Energy Recovery Facility. (Confirmed Non-EIA Development, May 2025)

Buckinghamshire Council

PL/24/3532/OA – Outline planning application (all matters reserved except for Access) for demolition of existing buildings and structures and construction of commercial buildings to comprise data centre use, including ancillary office space and associated plant, equipment and backup generation, car parking, landscaping, new vehicular access and new emergency access route. (under determination, validated 11 Dec 2024)

PL/24/3919/FA - Construction of vehicle commuter car park with associated access and landscaping (under determination, validated 23 Jan 2025).

PL/25/0504/SA - Certificate of lawfulness for proposed installation of above and below ground water infrastructure at Affinity Water Ltd's existing operational site (Approved, 24 Apr 2025)

PL/24/3756/FA - Development of a golf driving range; remodelling of the golf course and formalisation of the use of the temporary overspill car park (Approved, 11 Jul 2025).

PL/24/3417/EIASR - Formal request for an EIA Screening Opinion under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) with regard to the extension of the existing clubhouse to form a driving range, reconfiguration of the golf course and formalisation of the use of the temporary car parking (Confirmed Non-EIA development; 05 Dec 2024)

PL/25/1870/RM – Installation of 20m monopole to support 4 antennas and 1 GPS module together with 1 metering cabinet. (Refused, 07 Aug 2025).

Slough Borough Council

P/09858/024 - Change of use of part of the existing car park as an ultra-rapid charging hub and associated infrastructure, drainage, and access. (Approved 01 Jul 2021), with subsequent application:

P/09858/040 - Nonmaterial amendment to planning application P/09858/024 dated 01/07/2021 (Amendments to site layout) (Approved 05 Mar 2025).

Runnymede District Council

RU.25/0969– Egham Water Treatment – Planning application for the installation of 1 new building and 1 new kiosk to support the water treatment process. (under determination, validated 14 Jul 2025)

Hillingdon Borough Council

No relevant planning applications or known proposed development.

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