

Hampshire Water Transfer and Water Recycling Project

Consultation Report

Appendix A – Legislation Guidance and Advice

VOLUME NUMBER: 5

PLANNING INSPECTORATE SCHEME NUMBER: WA010002

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from
**Southern
Water.** 

The Southern Water logo consists of three stylized, wavy blue lines of varying lengths, positioned to the right of the text 'Southern Water'.

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A.1 Regard to Section 51 advice

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Regard to Section 51 advice

- 1.1.1 This appendix demonstrates the Applicant’s regard to pre-application advice in the form of the Advice Log, pursuant to Section 51 of the Planning Act 2008 (PA 2008). Advice has been extracted from the Planning Inspectorate’s published Advice Log with minor edits made by the Applicant to assist readability and clarity.
- 1.1.2 The Planning and Infrastructure Act 2025 (PIA 2005) received Royal Assent in December 2025. The pre-application consultation for the Project was undertaken prior to December 2025 and hence the consultation activities for the Project were undertaken in accordance with the PA 2008, prior to the PIA 2025 receiving Royal Assent. Therefore, Table A1-1 presents the advice from the Planning Inspectorate, on behalf of the Secretary of State, provided to the Applicant and how the Applicant has had regard to that advice.

Table A1-1 The Applicant’s regard to Section 51 advice

Reference	Date	Topic	Summary of advice received	The Applicant’s regard to advice
1	15 June 2021 Project Inception Meeting	Timeframes	The Planning Inspectorate explained the PA 2008 timeframes.	The Applicant considered the PA 2008 timeframes as the Project progressed through the pre-application stage.
2	25 November 2021 Project Update Meeting	Legislation changes	The Planning Inspectorate highlighted that the prospective Levelling-up and Regeneration Bill as well as the secondary legislation to support the Environment Act introduce some potential uncertainty in relation to future assessment products and the transitional provisions are being closely monitored.	The Applicant recognised the rapidly evolving policy and legislative context and continued to monitor developments closely to ensure the Project’s assessment approach remains aligned with emerging statutory requirements and any transitional arrangements that may be introduced. This included, for example, monitoring provisions that would allow projects

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				already in the system to continue under the existing Environmental Impact Assessment (EIA) regime while Environmental Outcome Reports are phased in, as well as transitional provisions enabling Nationally Significant Infrastructure Project (NSIP) applications accepted for examination before the statutory Biodiversity Net Gain (BNG) commencement date to proceed under the existing regime.
3	25 November 2021 Project Update Meeting	BNG	The Planning Inspectorate queried the Developer's approach to delivering the net gain requirements in the Environment Act.	The Applicant stated at the time that it was considering its wider corporate commitments and targets in relation to net gain and that project level commitments would follow. A Biodiversity Gain Plan (Document reference 7.11, DCO Volume 7) is included with the DCO application.
4	23 March 2022 Project Update Meeting	Section 35 Direction	The Planning Inspectorate advised the Applicant that it should include in its Section 35 direction request to the Department for Environment, Food and Rural Affairs (Defra) why it believes that the proposal is of national significance.	The Applicant included this in the Section 35 direction request.

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
5	23 March 2022 Project Update Meeting	EIA Scoping	The Planning Inspectorate queried whether it is expected that the feedback from the non-statutory Consultation (Summer 2022 Consultation) will be included within the Scoping Report. The Planning Inspectorate advised that further information on what should be included in the Scoping Report can be found in Advice Note 7.	The Environmental Statement (ES) Appendix 5.1 EIA Scoping Report, Volume II (Document reference 6.2, DCO Volume 6) presented summarised feedback from the Summer 2022 Consultation. The Applicant used the guidance in Advice Note 7 to shape the structure and content of the EIA Scoping Report.
6	14 June 2022 Project Update Meeting	Section 35 Direction	The Planning Inspectorate queried whether local authorities had been consulted by Defra following the Section 35 direction request.	The Applicant advised that local authorities had been made aware that a Section 35 direction request was being submitted, but that Defra had not chosen to consult them.
7	14 June 2022 Project Update Meeting	EIA	The Planning Inspectorate queried whether the EIA Scoping Report would include optionality for the corridor routes.	At the time the Applicant confirmed that the EIA Scoping Report would include the necessary optionality for the corridor routes. This approach was consistent with the Rochdale Envelope and provided the flexibility required ahead of detailed design, while still enabling the Inspectorate to form a view on the likely significant effects. Since EIA Scoping, the Applicant has developed the Project from pipeline corridors to Order Limits, which are

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				shown on the Works Plans (Document reference 2.3, DCO Volume 2). Where flexibility has been retained within these Order Limits, the ES assesses the maximum envelope (worst case scenario) in accordance with the Rochdale Envelope approach. ES Chapter 3 Description of the Proposed Development, Volume I (Document reference 6.1, DCO Volume 6) sets out where and why this remaining flexibility is sought.
8	14 June 2022 Project Update Meeting	EIA	The Planning Inspectorate queried what works are currently proposed that might affect the marine environment.	At the time the Applicant clarified that an existing outfall in the Solent is proposed to be used (the Long Sea Outfall) with no change to the existing pipeline. There would be some changes to the connecting infrastructure and what is discharged from the pipeline; however, an improvement could potentially be expected with regards to the discharge. Water quality modelling results associated with the reject water are presented in ES Appendices 19.5 Eastney LSO dispersion modelling and 19.8 Eastney LSO CORMIX modelling and summarised in ES Chapter 19 Water

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				<p>environment, Volume I (Document reference 6.1, DCO Volume 6). These assessments demonstrate that the changes to concentrations of water quality parameters are very small and spatially constrained. This means there are no likely significant effects on marine waters or any marine biodiversity receptors, which is discussed in the ES Chapter 9 Marine biodiversity, Volume I (Document reference 6.1, DCO Volume 6).</p> <p>The Project also includes a Sustainable Drainage System (SuDs) outfall in the design of the Water Recycling Plant (WRP) site. This outfall would be located in the tidal section of the Hermitage Stream and would release surface water flow from the WRP site. Potential effects on the marine environment associated with the SuDs outfall were therefore scoped into the EIA and are assessed and reported in ES Chapter 9 Marine biodiversity (Document reference 6.1, DCO Volume 6). Appropriate mitigation is identified and secured in the DCO through the Design Principles Document (Document reference 5.12, DCO Volume</p>

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				5), Outline CEMP (Document reference 7.1, DCO Volume 7), OMP (Document reference 7.1, DCO Volume 7) and Outline Invasive Non-Native Species (INNS) Biosecurity Plan (Document reference 7.10, DCO Volume 7). Water quality modelling results for the SuDs discharge are set out in ES Appendix 19.12 WRP SuDS dispersion modelling, Volume II (Document reference 6.2, DCO Volume 6), which shows that the change in salinity associated with the intermittent water from the SuDs outfall, compared to natural fluctuations in ambient salinity levels throughout the tidal cycle would be insignificant.
9	14 June 2022 Project Update Meeting	EIA	The Planning Inspectorate advised that where agreements have been reached with the working groups regarding the scope of the EIA, including any matters scoped out, the Applicant consider how such agreements are evidenced in the EIA Scoping Report to support any scoping out requests.	Topic-specific EIA Working Groups have been used as a key mechanism to inform and refine the scope of the EIA, including the identification of matters proposed to be scoped in or out. Where agreement has been reached through the Working Groups on scoping matters, this has informed the Applicant's proposed scope. ES Appendix 5.1 EIA Scoping Report, Volume II (Document

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				reference 6.2, DCO Volume 6) evidences this through: <ul style="list-style-type: none"> • Descriptions of Working Group engagement and meeting dates within each topic chapter • Summaries of the scoping discussions held, including consideration of effects proposed to be scoped out • Topic-specific rationale tables setting out the justification for scoping decisions.
10	6 September 2022 Project Update Meeting	EIA Scoping	The Planning Inspectorate queried whether any construction compound areas would bring in new host local authorities under Section 43 of the PA 2008.	No new host local authorities were introduced as a result of the location of construction compound areas.
11	6 September 2022 Project Update Meeting	EIA Scoping	The Planning Inspectorate queried whether there would be any element of the Project within the marine environment.	At the time the Applicant clarified that an existing outfall in the Solent is proposed to be used (the Long Sea Outfall) with no change to the existing pipeline. There would be some changes to the connecting infrastructure and what is discharged from the pipeline; however, an improvement could potentially be expected with regards to the discharge.

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				<p>Water quality modelling results associated with the reject water are presented in ES Appendices 19.5 Eastney LSO dispersion modelling and ES Appendix 19.8 Eastney LSO CORMIX modelling, Volume II (Document reference 6.2, DCO Volume 6) and summarised in ES Chapter 19 Water environment, Volume I (Document reference 6.1, DCO Volume 6). These assessments demonstrate that the changes to concentrations of water quality parameters are very small and spatially constrained. This means there are no likely significant effects on marine waters or any marine biodiversity receptors, which is discussed in the ES Chapter 9 Marine biodiversity, Volume I (Document reference 6.1, DCO Volume 6).</p> <p>The Project also includes a SuDs outfall in the design of the WRP site. This outfall would be located in the tidal section of the Hermitage Stream and would release surface water flow from the WRP site. Potential effects on the marine environment associated with the SuDs outfall were therefore scoped into</p>

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				the EIA and are assessed and reported in ES Chapter 9 Marine biodiversity, Volume I (Document reference 6.1, DCO Volume 6). Appropriate mitigation is identified and secured in the DCO through the Design Principles Document (Document reference 5.12, DCO Volume 5), Outline CEMP (Document reference 7.1, DCO Volume 7), OMP (Document reference 7.1, DCO Volume 7) and Outline INNS Biosecurity Plan (Document reference 7.10, DCO Volume 7). Water quality modelling results for the SuDs discharge are set out in ES Appendix 19.12 WRP SuDS dispersion modelling (Document reference 6.2, DCO Volume 6), which shows that the change in salinity associated with the intermittent water from the SuDs outfall, compared to natural fluctuations in ambient salinity levels throughout the tidal cycle would be insignificant.
12	6 September 2022 Project Update Meeting	EIA Scoping	The Planning Inspectorate queried the status of the geotechnical work that is currently underway and whether it was likely to affect the proposed route of the	Geotechnical work was undertaken in phased priority areas. Geotechnical information available at the time was used to define the proposed pipeline routes. The EIA Scoping Area

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			pipeline in terms of the scoping boundary.	was then defined which included the proposed pipeline route. Since EIA scoping, scheme development work has continued which has resulted in definition of, and refinements to, the Order Limits. The study area for the land quality and ground conditions assessment (ES Chapter 11 Land quality and ground contamination, Volume I (Document reference 6.1, DCO Volume 6)) has been defined by a series of buffer zones from the Order Limits, ensuring that an appropriate study area is selected based on the impacts that may occur and the location of any receptors that may be affected by those potential impacts.
13	6 September 2022 Project Update Meeting	EIA Scoping	The Planning Inspectorate advised that certain periods can be more challenging for the prescribed consultation bodies to respond within the statutory timeframe and therefore recommended that the scoping opinion request avoid the Christmas holiday period, where possible.	The Applicant noted the advice. The Applicant prepared and submitted an EIA Scoping Report on 21 July 2023.
14	6 September 2022	EIA Scoping	The Planning Inspectorate advised the Applicant to provide in its Scoping Report	The EIA Scoping Report (ES Appendix 5.1 EIA Scoping Report, Volume II

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	Project Update Meeting		the justification for scoping matters out, together with supporting evidence, where available. Where such matters have been agreed with relevant consultation bodies in advance, it is helpful to include reference to/evidence of such agreements with the Scoping Report.	(Document reference 6.2, DCO Volume 6)) set out the justification for scoping matters out and, where available, provided supporting evidence. This included desktop baseline studies, preliminary environmental assessments and early survey data. The EIA Scoping Report also referenced discussions held with relevant consultation bodies in advance of submission, including through the EIA Working Groups, Joint Officer Group (JOG) meetings and bilateral engagement, where agreement had been reached on the scope of particular matters. Section 5.2 of ES Chapter 5 EIA approach and methodology, Volume I (Document reference 6.1, DCO volume 6) summarises the topics scoped out.
15	6 September 2022 Project Update Meeting	Regional Plan and Water Resources Management Plan (WRMP) 24	The Planning Inspectorate asked the Applicant if the WRMP24 went to an inquiry, would they delay the DCO application submission timetable.	The Applicant explained that it would keep this under review throughout the pre-application stage and that any decision to progress the DCO application in light of a WRMP24 inquiry would very much depend on the nature of the inquiry.

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
16	6 September 2022 Project Update Meeting	Next steps/ Any other business	The Planning Inspectorate directed the Applicant to Advice Note 7, which contains helpful and practical advice with regards to EIA Scoping, including the requirements for a GIS shapefile 10 working days in advance of the formal scoping opinion request. The Inspectorate also made the Applicant aware of the recently published revised Advice Note 10.	The Applicant noted this advice. The EIA Scoping Report (ES Appendix 5.1 EIA Scoping Report, Document reference 6.2, DCO Volume 6) was prepared with regard to Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements (Version 7). Advice Note Ten relates to Habitats Regulations Assessment (HRA) which has been taken into account in the HRA - Stage 2 Appropriate Assessment (AA) and Marine Conservation Zone (MCZ) - Stage 1 Assessment (Document reference 5.2, DCO Volume 5) undertaken for the Project.
17	15 November 2022 Project Update Meeting	Scheme Development Update	The Planning Inspectorate queried whether the Applicant may need to request a new Section 35 Direction from the relevant Secretary of State with regard to a potential combined tunnel.	The Applicant confirmed at the time this may require an amendment to the principal development description in the Section 35 Direction, but this required further consideration pending a decision on whether a tunnel of this kind was possible. The Applicant since secured a variation in 2024 to its 2022 Section 35 Direction,

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				to account for the delivery of a tunnel of this kind.
18	15 November 2022 Project Update Meeting	Scheme Development Update	The Planning Inspectorate advised that there should be a clear need for the flexibility sought within the parameters set and advised the Applicant to ensure that any flexibility sought is fully explained and justified.	<p>The Applicant explained that an appropriate level of flexibility is necessary to ensure the timely delivery of the Project and to support the procurement approach to Project delivery.</p> <p>The Applicant has since been clear through its consultations and engagement about the level of detail it is seeking to secure through its DCO application and the implied flexibility. Where flexibility is sought, the ES assesses the maximum 'envelope' (worst case scenario) in accordance with the Rochdale Envelope approach (Advice Note Nine: Rochdale Envelope).</p>
19	15 November 2022 Project Update Meeting	Programme Update	The Applicant noted that it may be useful for the Planning Inspectorate to understand the technology involved in the water recycling process.	To support understanding of the technology involved in the water recycling process, the Planning Inspectorate attended a site visit to the water recycling pilot plant at Budds Farm Wastewater Treatment Works (WTW), arranged by the Applicant.

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20	15 November 2022 Project Update Meeting	Draft Documents	The Planning Inspectorate queried whether the Applicant was intending to submit a suite of draft DCO application documents to the Planning Inspectorate for review.	The Applicant confirmed that it would and subsequently did this in October 2025.
21	16 March 2023 Project Update Meeting	Further development on design of the Project – construction phase	The Planning Inspectorate queried how many lagoons were being proposed and whether they are temporary or permanent.	Water storage lagoons would be located within construction compounds, where required. Section 3.5 of ES Chapter 3 Description of Proposed Development, Volume I (Document reference 6.1, DCO Volume 6) lists the construction compounds and identifies which would accommodate water storage lagoons. The water storage lagoons would be required only temporarily during the testing of the installed Pipeline between the WRP site and the Otterbourne Water Supply Works (WSW) and would be removed once testing is complete. No permanent lagoons are proposed.
22	16 March 2023 Project Update Meeting	EIA Scoping	The Planning Inspectorate asked whether the EIA Scoping Report would include optionality for the shared tunnel with Portsmouth Water.	The EIA Scoping Report included two options for the Project between the WRP site and Havant Thicket Reservoir: either a single continuous tunnel or two separate tunnels with a connection at Bedhampton Springs.

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				Following the approval in 2025 of Portsmouth Water's application for a pipeline between Bedhampton Springs and Havant Thicket Reservoir, the Applicant's proposal for continuous pipelines between the WRP site and Havant Thicket Reservoir was not progressed any further.
23	16 March 2023 Project Update Meeting	WRMP24 update	The Planning Inspectorate queried whether there are any implications of the WRMP process on the timing of the DCO submission, given the DCO submission has been revised to 2025.	At the time the query was raised, the Applicant did not perceive there to be an issue between the forecast date of DCO submission in 2025 and the WRMP process. The Applicant confirmed that it would nonetheless prepare a need case for the Project should the WRMP24 not be published by the time of submission.
24	11 July 2023 Project Update Meeting	Pre-Scoping EIA Working Group meetings	The Planning Inspectorate asked the Applicant to expand on the members of the EIA Working Groups.	The Applicant advised that the five EIA Working Groups included local planning authorities, and statutory bodies such as Historic England, Natural England and the Environment Agency. A separate Wildlife and Water Group had also been established to engage with non-statutory bodies.
25	11 July 2023	EIA Scoping Report	The Planning Inspectorate advised the Applicant to review Advice Note Seven:	The Applicant noted this advice and had regard to this advice note when

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
	Project Update Meeting		EIA Process, Preliminary Environmental Information and Environmental Statements, which provides advice on information required to justify proposed scoping out.	preparing the EIA Scoping Report (ES Appendix 5.1 EIA Scoping Report, Volume II (Document reference 6.2, DCO Volume 6)).
26	11 July 2023 Project Update Meeting	Integration with Portsmouth Water Pipeline	The Planning Inspectorate queried whether the Applicant intended to include the pipeline between the Water Recycling Plant and Havant Thicket Reservoir in its EIA Scoping Report.	<p>The Applicant confirmed that it would include both its segmental tunnel proposal and any potential shared tunnel proposal in its EIA Scoping Report, in order to retain flexibility for both options.</p> <p>The Applicant included the pipeline between the Water Recycling Plant and Havant Thicket Reservoir (representing the back-up option) in the EIA Scoping Report and in the Preliminary Environmental Information (PEI) Report published at the Summer 2024 Consultation. In 2025, it was confirmed that the back-up option would not be required. Instead, the connection between the WRP and Havant Thicket Reservoir would be via Bedhampton Springs, where pipelines from the WRP would connect into pipelines delivered by Portsmouth Water between Bedhampton Springs and Havant Thicket Reservoir</p>

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				(which have been consented separately).
27	11 July 2023 Project Update Meeting	Programme Update	The Planning Inspectorate queried whether the potential to share pipeline/tunnels with Portsmouth Water would have any implications for the Section 35 Direction obtained for the Project.	<p>The Applicant considered the implications of sharing pipelines/tunnels with Portsmouth Water and confirmed that this had no adverse effect on the Section 35 Direction.</p> <p>The potential for shared infrastructure was anticipated during scheme development, and the Applicant secured a variation to the original 2022 Direction in 2024 specifically to reflect the delivery of a tunnel solution of this kind.</p> <p>The varied Direction confirms that the updated Principal Development remains within the scope of the development for which consent is required, and the shared use of Portsmouth Water's assets sits within the associated development and ancillary matters allowed for within the Section 35 Direction.</p>
28	11 July 2023 Project Update Meeting	Other business	The Planning Inspectorate queried with the Applicant how the EIA Scoping Report was to be submitted to the Inspectorate and confirmed that use of a	The Applicant noted the advice. ES Appendix 5.2 Scoping Report, Volume II (Document Reference 6.2, DCO Volume

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			file transfer site or SharePoint site is possible, where files are too large to be sent by email. A test download could be undertaken before the formal request. The Inspectorate reiterated the information in its Advice Note 7 with regards to individual file size for publication. Single files are requested to be no more than 50MB in size. The Inspectorate advised it is possible to divide the EIA Scoping Report into separate parts and/or provide a high-resolution and low-resolution version.	6) was subsequently submitted via a SharePoint site on 21 July 2023.
29	26 September 2023 Project Update Meeting	Scoping feedback	The Planning Inspectorate noted that the Applicant's approach to addressing matters raised in the Scoping Opinion appeared to be reasonable.	The Applicant noted this advice and has had regard to matters raised in the EIA Scoping Opinion in ES Appendix 5.3 Response to EIA Scoping Opinion, Volume II (Document reference 6.2, DCO Volume 6).
30	26 September 2023 Project Update Meeting	Scheme Development Update	The Planning Inspectorate asked if there are potential issues that the Applicant could foresee that could impact on the delivery of the Proposed Development.	At the time the Applicant stated that a key risk to project delivery is realising the consenting strategy and explained that local opposition in Havant brings uncertainty to the delivery of the combined tunnelled solution being taken forward by Portsmouth Water.

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				This Potential Main Issues for the Examination ('PMIE') (Document reference 5.7, DCO Volume 5) has been prepared to accompany the application and sets out the matters which are likely to require examination having regard to the matters discussed with stakeholders during the pre-application process.
31	26 September 2023 Project Update Meeting	Scheme Development Update	The Planning Inspectorate queried how any optionality remaining in scheme design would be assessed in the ES.	At the time the Applicant confirmed that it would be clear in the ES where options remain and that these would be assessed. Where flexibility is sought, the ES assesses the maximum 'envelope' (worst case scenario) in accordance with the Rochdale Envelope approach (Advice Note Nine: Rochdale Envelope).
32	26 September 2023 Project Update Meeting	Scheme Development Update	The Planning Inspectorate asked for confirmation of when a variation of the section 35 direction would be sought.	The Applicant confirmed to the Planning Inspectorate at the time that discussions had commenced with Defra around the need to vary the current Section 35 Direction, referring to the opportunity to develop combined tunnel pipelines. The Applicant subsequently secured a variation to its Section 35 Direction in November 2024.

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
33	26 September 2023 Project Update Meeting	Engagement update	The Planning Inspectorate asked about progress with HRA matters.	At the time the Applicant advised of issues raised by NE in its responses to the Scoping Report regarding impacts to marine water quality and to chalk stream and groundwater dependent ecosystems. Although the HRA Stage 1 Screening Assessment was not completed by the Applicant in time for statutory consultation, the Summer 2024 Consultation, the Applicant confirms that the HRA Stage 2 AA and MCZ Stage 1 Assessment has been shared for comment with relevant consultation bodies, including NE and the Marine Management Organisation (MMO). This was done at both the Stage 1: Screening and Stage 2: AA stages. Comments received have been incorporated into the final version submitted with the DCO application.
34	25 January 2024 Project Update Meeting	Summer 2024 Consultation	The Planning Inspectorate suggested ensuring the access of hard-to-reach groups like traveller groups when going out for consultation.	The Applicant confirmed that its 2024 Statement of Community Consultation (SoCC) would seek feedback from local authorities on hard-to-reach groups, referred to also as seldom heard groups. For the Summer 2024 Consultation, the Applicant identified and contacted hard-

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				<p>to reach and seldom heard groups likely to be impacted by the Project by post and by email on a non-prescribed basis. The Applicant used Joint Officer Group meetings with local planning authorities, as well as the 2024 SoCC process to confirm the approach.</p> <p>This approach demonstrates how the Applicant has had regard to the Public Sector Equality Duty and the expectations in Section 47 of the PA 2008 by proactively identifying and engaging groups with protected characteristics and those who may otherwise be less likely to participate in consultation.</p> <p>For more details, please refer to Chapter 9 of the Consultation Report.</p>
35	23 May 2024 Email	The Infrastructure Planning (Miscellaneous Provisions (MP)) Regulations 2024 –	The Planning Inspectorate advised the Applicant to review the transitional provisions in Regulation 4 of the MP Regulations 2024, together with the amendments to the APFP Regulations, and consider whether any new or different consultation bodies should be	The Applicant acknowledges these amendments and confirms that these have been considered as part of the statutory consultations, Summer 2024 Consultation, Spring 2025 Consultation, Autumn 2025 Consultation, and Spring 2026 Consultations undertaken after the 30 April 2024.

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
		Section 42 consultation	included in the consultations for the project.	<p>The Applicant confirms that it has consulted all persons prescribed under Section 42(1)(a), Section 42(1)(aa), 42(1)(b) under Section 43, Section 42(1)(d) under Section 44 for the purposes the PA 2008 as set out in Schedule 1 to the Infrastructure Planning (Applications: Prescribed Forms and Procedure) (APFP) Regulations 2009, as amended by the Infrastructure Planning (Miscellaneous Provisions) Regulations 2024.</p> <p>The following provisions of the APFP Regulations 2009 (as amended) are relevant to the statutory consultations undertaken on the Project:</p> <ul style="list-style-type: none"> • Regulation 3: Prescribed consultees. • Regulation 4: Publicising a proposed application; and • Schedule 1: Circumstances when consultees must be consulted and notified about an application. <p>Annex 1 (Consultation compliance checklist) of the Consultation Report summarises how the Applicant has satisfied the relevant requirements of the</p>

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				<p>APFP Regulations 2009 (as amended) with further detail provided within.</p> <p>For clarity, the Section 42 consultee list, including all bodies added or amended by the Infrastructure Planning (Miscellaneous Provisions) Regulations 2024, is provided within Appendix F.17 (Lists of consultees) of this report, together with confirmation of the consultation stages at which each prescribed consultee was engaged and the method of consultation used, demonstrating full compliance with Regulations 3 and 4 and Schedule 1 of the APFP Regulations 2009 (as amended).</p>
36	1 November 2024 Email	Feedback on Programme Document	<p>Programme Document's timeline seems to be missing the submission of draft documents to the Planning Inspectorate. This is a notable feature of the Standard tier of service, and we encourage you to make full use of it. Draft documents are usually submitted towards the end of the pre application period, with sufficient time after the 6-week review period (before the full application submission) for the Applicant to respond to Planning</p>	<p>The Applicant confirms that the draft documents were issued in September 2025, allowing for the six-week review period. The Programme Document (October 2025) was revised to reflect this updated timetable and published on the dedicated consultation website.</p>

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			Inspectorate feedback. Please advise when the Applicant intends to submit draft documents to the Planning Inspectorate, update the timeline in the Applicant's Programme Document, and publish the updated document to the Applicant's project website.	
37	26 November 2024 Project Update Meeting	Programme Document	The Planning Inspectorate advised to add changes to the Programme Document and that the Applicant did not need to use all 6 meetings if it doesn't need them but try to plan what it want from the Planning Inspectorate in meetings i.e. Inception, post draft documents etc. The programme document is a good way to schedule that in.	The Applicant noted this advice. Section 4 of the Programme Document sets out the pre-application engagement undertaken with the Inspectorate and other relevant stakeholders
38	26 November 2024 Project Update Meeting	Programme Document	The Programme Document should include the varied Section 35 Direction.	The updated Programme Document published on 18 February 2025 included the varied Section 35 Direction in Section 2.
39	26 November 2024 Project Update Meeting	Consultation Report	The Inspectorate advised capturing all feedback in the consultation report.	The Consultation Report provides summaries of consultation feedback in the form of issue statements with responses to feedback from the Applicant in Appendix F (Summer 2024 Consultation), Appendix G (Spring 2025

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				Consultation), Appendix H (Autumn 2025 Consultation), and Appendix I (Spring 2026 Consultations). A summary of feedback report was produced approximately three months after the end of the Summer 2024 Consultation and the Spring 2025 Consultation and was made available on the dedicated project website as well as the Applicant's main website. Those who had signed up to the Project's 'Keep in Touch' also received an email with a direct link to the summary of feedback report.
40	26 November 2024 Project Update Meeting	Section 35	The Planning Inspectorate advised the Applicant to ensure the Statutory Consultation reflects the varied Section 35 Direction.	The Applicant confirms that relevant checks were made to ensure that Spring 2025 Consultation materials were consistent with the varied Section 35 Direction.
41	26 November 2024 Project Update Meeting	Application/ Order limits	The Planning Inspectorate advised that if changes are made to the draft Order Limits compared to the scoping boundary, it would be helpful for these to be clearly explained in the Application.	The Applicant has undertaken a review of the Order Limits against the EIA Scoping Area as part of the EIA and application preparation process. The Scheme Development Report (SDR) (Document reference 5.1, DCO Volume 5) explains the iterative design evolution of the Project, including the factors that led to amendments to the Order Limits.

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				<p>Sections 4, 5, 6 and 7 of the SDR (Document reference 5.1, DCO Volume 5) explain how the design of the Project was developed following EIA Scoping.</p> <p>The ES confirms that the Order Limits and Project parameters are such that the Project remains materially the same as that proposed at scoping stage, taking into account changes to the Order Limits.</p>
42	26 November 2024 Project Update Meeting	Draft documents	<p>The Planning Inspectorate requested that draft DCO documents are submitted as complete as possible as incomplete skeleton documents are difficult to provide any valuable feedback on.</p> <p>The Planning Inspectorate highlighted Land Plans and Book of Reference as documents that should be complete if submitted for review. Time should be allocated for the Planning Inspectorate to review the draft docs and for the Applicant to be able to assess and respond to/act upon any feedback provided. The Planning Inspectorate advised that it was preferable for the documents to be submitted altogether.</p>	<p>A suite of draft DCO documents was submitted to the Planning Inspectorate in September 2025 to support a coordinated and efficient review. These documents were provided with sufficient time for the Planning Inspectorate to review them and for the Applicant to consider and act upon any feedback ahead of submission.</p> <p>The Applicant recognises that the Planning Inspectorate's ability to comment was influenced by the completeness of the materials available at the time, and that not all documents were in a complete form at the time they were provided.</p>

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
43	26 November 2024 Project Update Meeting	Draft documents	The Planning Inspectorate noted that the draft HRA Report was not listed in the Applicant's proposed draft documents for review; it confirmed that review of the HRA Report does form part of the standard tier service and that the Report can be reviewed if required.	A draft HRA Stage 2 AA and MCZ Stage 1 Assessment was submitted along with other draft documents in September 2025.
44	26 November 2024 Project Update Meeting	Change Requests	Advised the Applicant to note recent change requests (e.g. Mona, Byers Gill) where limited time to complete the Examination could lead to refusal.	The Applicant noted the advice on change requests during Examination.
45	26 November 2024 Project Update Meeting	Programme Document	The Planning Inspectorate requested the updated Programme Document soon for review and highlighted that when more firm dates are known next year for draft docs this should be provided again. The Planning Inspectorate envisages that this document is regularly updated to help both the Planning Inspectorate and other bodies help plan resources accordingly.	Iterations of the Programme Document were published on the Project website in February, May, and October 2025, and March 2026.
46	26 November 2024 Project Update Meeting	HRA	The Planning Inspectorate advised that it would be helpful to have an update on progress of the HRA work and engagement with relevant consultation bodies, including NE.	The Applicant has engaged with relevant consultation bodies, including Natural England, Environment Agency and the MMO, and confirms that the HRA has been shared for comment with these consultation bodies at both the Stage 1:

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				Screening and Stage 2: AA stages. These comments have been incorporated into the HRA - Stage 2 AA and MCZ - Stage 1 Assessment (Document reference 5.2, DCO Volume 5) submitted with the DCO application.
47	26 November 2024 Project Update Meeting	Water quality modelling	The Planning Inspectorate advised that it would be helpful to receive further updates on progress of freshwater and marine water quality modelling, and engagement with relevant consultation bodies including the Environment Agency at future meetings and to understand how it is proposed to be addressed in the DCO application.	The Applicant noted the advice and provided further updates on this matter at subsequent project update meetings with the Planning Inspectorate, as well as confirming that a Water Environment Regulations compliance assessment would be submitted as part of the ES. An Environmental Water Quality Report was published as part of the Spring 2025 Consultation (please see Appendix G.2 (Environmental Water Quality Report) of the Consultation Report)) which provided additional information on freshwater and marine water quality modelling. A high-level summary of the scope of this consultation was provided to the Planning Inspectorate in advance. The ES supporting the DCO application includes modelling appendices and assessment of effects in relevant chapters. Consultation and engagement with relevant bodies, including the EA,

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				has continued during preparation of the ES.
48	19 March 2025 Project Update Meeting	s35 Direction	The Planning Inspectorate noted that the Applicant has received the variation to the s35 Direction from the Secretary of State and drew the Applicant's attention to other water infrastructure schemes which had requested variations where the Applicants would not be undertaking the delivery of the Project.	The reasons why it was considered that a Section 35 Direction was appropriate for the Project were set out in detail in its qualifying request for a Section 35 Direction. Those reasons relate to issues with how the NSIP threshold is expressed in terms of deployable output and do not relate to the identity of the person carrying out the Project. The issue of concern underlying this advice does not apply in the case of the Project.
49	19 March 2025 Project Update Meeting	Adequacy of Consultation Milestone (AoCM)	The Planning Inspectorate recommended that the Applicant receive a written statement or feedback from Local Authorities (LAs) on their Adequacy of Consultation (AoC) at that stage, although it recognises that this is not entirely in the Applicant's control, especially given the resourcing demands on LAs.	The Applicant actively engaged with host local authorities to support the AoCM submission and sent letters to each asking for written feedback or statements in line with the Planning Inspectorate's advice. These letters were sent on 16 May 2025 and can be found in Appendix A of the Appendix A.3 (AoCM). The Applicant received responses from all seven host local authorities. These can be viewed in Appendix B of the Appendix A.3 (AoCM). All local authorities assessed the Applicant as having complied with the duties to consult and

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				publicise (Sections 42, 47, and 48 of the PA 2008).
50	19 March 2025 Project Update Meeting	HRA and MCZ assessments	The Planning Inspectorate welcomed confirmation that the Applicant was working with both NE and the MMO on these assessments and requested an update on their feedback at the next project meeting. In particular, if NE or MMO had any concerns regarding the principle of the assessment rather than matters of detail, these would need to be flagged as soon as possible.	The Applicant has engaged with relevant consultation bodies, including NE, the EA and the MMO, and confirms that the draft HRA has been shared for comment with these consultation bodies, at both the Stage 1: Screening and Stage 2: AA stages. These comments have been incorporated into the HRA - Stage 2 AA and MCZ - Stage 1 Assessment (Document reference 5.2, DCO Volume 5) submitted with the DCO application. No concerns regarding the principle of the assessment were raised by NE or the MMO.
51	19 March 2025 Project Update Meeting	Commitments Register	The Planning Inspectorate advised the Applicant to follow the Planning Inspectorate's advice page on production of the register, as this would help it to produce an effective document. There were no examples of particularly good practice the Planning Inspectorate could direct the Applicant to at present, but the Planning Inspectorate was content for the Applicant to look at other NSIPs for examples and adapt to suit its needs.	The Applicant confirmed that the advice page had been taken into consideration in preparation of the Commitments Register (ES Appendix 5.5 Commitments Register, Volume II (Document reference 6.2, DCO Volume 6)) and has been developed drawing on the guidance provided from the Planning Inspectorate. The format of the Commitments Register follows the template example provided in Planning Inspectorate advice.

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
			The Planning Inspectorate confirmed that the Applicant does not have to use the template in the advice pages but it is intended as a helpful example and can be adapted to suit.	
52	19 March 2025 Project Update Meeting	Draft documents	The Planning Inspectorate confirmed that draft documents needed to be submitted all together, rather than in tranches as they are ready.	Draft documents were submitted together in a single package, rather than in tranches, in line with the Planning Inspectorate's advice.
53	19 March 2025 Project Update Meeting	Draft documents – ES & HRA	The Planning Inspectorate advised it would only review the Description of the Proposed Development Chapter (the ES Project Description Chapter), with other introductory chapters accepted for information only. It noted it could provide feedback on the alternatives chapter if the Applicant had specific questions. The Planning Inspectorate also suggested the Applicant consider whether review of draft HRA reports would be beneficial, as this is available through the pre-application service.	<p>The Applicant provided the Planning Inspectorate with a draft of ES Chapter 3 Description of the Proposed Development as part of the pre-application document review in September 2025.</p> <p>The Applicant did not provide a draft of ES Chapter 4 Consideration of alternatives for review as there were no specific questions for the Planning Inspectorate in relation to this.</p> <p>The Applicant confirms that a final draft of the HRA Stage 2 AA and MCZ Stage 1 Assessment was shared for comment with the Inspectorate in autumn 2025. Following discussion with the Inspectorate,</p>

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				appropriate changes have been made to the HRA - Stage 2 AA and MCZ - Stage 1 Assessment (Document reference 5.2, DCO Volume 5) submitted with the DCO application. The final draft HRA Stage 2 AA and MCZ Stage 1 Assessment was shared for comment in September 2025 to NE, the MMO, and the EA. The Applicant arranged a dedicated discussion with the HRA team to explore matters including potential offsite compensation and the effects being addressed, particularly in relation to the Solent Waders and Brent Goose Strategy (SWBGS) designation underlying the Special Protection Area (SPA).
54	19 March 2025 Project Update Meeting	Programme Document (PD)	The Planning Inspectorate advised that the Applicant must publish a public-facing PD on its website with enough detail for the public to understand the project. It noted that the latest PD shows little change from the previous version and stressed that PDs should be updated to reflect developments during the pre-application stage.	The Programme Document was updated and published on the Applicant's dedicated consultation website on 15 October 2025. It provides clear information for the public on the Project and sets out the timetable and activities required for an effective pre-application process. The October 2025 version is more developed than the February 2025 edition, reflecting progress made during the year, including a revised DCO

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				submission date (Spring 2026), completion of further statutory and targeted consultations, enhanced engagement detail, and updated issues and risks informed by ongoing design refinement and stakeholder feedback. The latest update to the Programme Document was on 18 March 2026.
55	19 March 2025 Project Update Meeting	EA Updates	The Planning Inspectorate advised the Applicant to take account of updated flood risk and coastal erosion data in the DCO application documents and explain any implications for the assessment.	The Applicant confirms that updated flood-risk and coastal erosion data and relevant implications for assessment have been incorporated into the DCO application documents, including ES Chapter 19 Water environment, Volume I (Document reference 6.1, DCO Volume 6) and Appendix 19.1 Flood Risk Assessment, Volume II (Document reference 6.2, DCO Volume 6). The Applicant has also embedded continued engagements with the EA into its pre-application planning.
56	15 July 2025 Project Update Meeting	Spring 2025 consultation feedback/Adequacy of Consultation	The Planning Inspectorate advised that while best practice for AoCMs is still emerging, the Applicant should use the prospectus for guidance, with document length reflecting the scale and nature of consultations. The AoCM will be tested	The Applicant confirms that it complied with the Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus as set out in Annex 1 (Consultation compliance checklist) of this report.

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
		Milestone (AoCM)	<p>against the s55 checklist at acceptance, similar to the consultation report.</p> <p>The Planning Inspectorate stressed the importance of showing how consultation feedback influenced the project, recommending an outline of outcomes and actions to enable meaningful advice. It noted that deferring too many actions to the consultation report would limit feedback on adequacy. The Planning Inspectorate was content with the Applicant's proposal to provide a short summary of intended responses rather than a detailed line-by-line account.</p>	<p>The AoCM was submitted to the Planning Inspectorate on 29 October 2025. The Applicant confirms that the AoCM provided details of how the consultation responses received at Public Consultation 2021, Summer 2022 Consultation, Summer 2024 Consultation and Spring 2025 Consultation were shaping the development of the Project. The Autumn 2025 Consultation and Spring 2026 Consultations were not included in the AoCM as the Autumn 2025 Consultation closed on 8 October 2025 and the Applicant required time to consider the consultation responses. At the time the Applicant was preparing the AoCM, the DCO application was anticipated to be submitted in late 2025. The Spring 2026 Consultations were not planned at the time of the AoCM submission.</p>
57	15 July 2025 Project Update Meeting	Update on environmental matters	<p>The Planning Inspectorate noted that although the Applicant's PEI Report addressed environmental effects, it advised that further mitigation should be considered for construction noise at two receptors.</p>	<p>PEI Report Chapter 15 Noise and Vibration identified the potential for significant effects due to construction noise at 45 receptors. The Applicant has developed additional potential mitigation measures such as restrictions on working hours at some locations, and</p>

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
			<p>On HRA, the Planning Inspectorate queried the Applicant's conclusion of no adverse effects on integrity if it also refers to offsite habitat creation being developed. It requested clarification as to whether the habitat creation is deemed by NE as mitigation or compensation, including details of potentially affected European sites and qualifying features, impact pathways of concern, advice received from NE, and steps towards developing any derogations case. It noted that if adverse effects on integrity (AEoI) could not be excluded and compensatory measures are required, then this must form part of a derogations case which would need to be submitted with the DCO.</p> <p>The Planning Inspectorate directed the Applicant to its advice page and the National Policy Statement for water resources infrastructure for guidance.</p> <p>Regarding the MCZ assessment, the Planning Inspectorate asked for a further update at the next project meeting.</p>	<p>use of acoustic enclosures over trenchless crossing entry shafts. ES Chapter 15 Noise and vibration, Volume II (Document reference 6.2, DCO Volume 6) provides an updated assessment of the effects, including additional information on the duration of night-time works. With this mitigation in place, residual effects are assessed as not significant.</p> <p>The Applicant has submitted a HRA - Stage 2 AA and MCZ - Stage 1 Assessment (Document reference 5.2, DCO Volume 5) with the DCO application which sets out the potential impact pathways from the Project and the European designated sites potentially affected. It also details the mitigation required to reduce these impacts to a level that is not significant. Feedback from NE on the draft HRA Stage 2 AA and MCZ Stage 1 Assessment has been incorporated into the final version of this document. Resolution of this feedback has been summarised in the SoCG. NE has also confirmed that this is mitigation and not compensation. The HRA - Stage 2 AA</p>

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				and MCZ - Stage 1 Assessment (Document reference 5.2, DCO Volume 5) concludes that with the consideration of further design details and with the application of mitigation measures, there would be no impacts which undermine conservation objectives or result in an adverse effect on the integrity of the Habitats sites or MCZ. As such, a derogations case would not be required.
58	15 July 2025 Project Update Meeting	Draft documents/ pre-application submission	The Planning Inspectorate advised the Applicant to follow updated guidance on which documents should be submitted and in what order, confirming that the programme document is included. It stated that only documents within the standard tier listed in the Prospectus would be reviewed at draft stage, though specific advice could be sought on other documents at its discretion. The Applicant may submit a sample of the Pre-application Land and Rights Negotiation Tracker for advice and should consider approaches taken by other projects. The Planning Inspectorate highlighted that the Book of Reference is essential for checking the draft DCO (dDCO) alongside land and works plans,	The Applicant noted the advice, including confirmation that the Programme Document would be submitted alongside the DCO application. The following draft documents were submitted in September 2025 to the Planning Inspectorate for review: <ul style="list-style-type: none"> • dDCO • Draft Explanatory Memorandum • Draft Works Plans (samples) • Draft Land plan (sample) • Draft Book of Reference (sample) • Draft Pre-application Land and Rights Negotiations Tracker (this

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
			and feedback on its format could be useful. It confirmed that the Commitments Register and policy compliance documents fall outside the standard tier and would not be reviewed at draft stage.	<p>tracker covers the same format as the recent North Falls DCO)</p> <ul style="list-style-type: none"> • Draft Planning Policy Statement • Draft ES Chapter 3 (Description of Proposed Development) • Draft HRA
59	15 July 2025 Project Update Meeting	Key Issues/AOB	The Planning Inspectorate advised the Applicant to make efforts to resolve local landowner and community opposition before submission, and to prepare to receive relevant representations and submissions during Examination where issues remain unresolved.	<p>The Applicant confirms that landowner engagement has continued in order to resolve outstanding matters and fully anticipates issues being raised in representations. Other stakeholder engagement has continued alongside this, including further targeted consultation in Autumn 2025 on a number of minor design refinements, many of which were aimed at addressing outstanding landowner concerns. A summary of responses received to the Autumn 2025 Consultation can be found in Chapter 11 of the Consultation Report.</p> <p>The Applicant is engaging with and seeking to negotiate voluntary land agreements for the required rights with affected landowners and has undertaken a number of meetings to discuss issues raised by landowners and their representatives. Please see the Pre-</p>

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				<p>application Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4) for the current status of such negotiations.</p> <p>The Applicant has carefully evaluated site and route options against a range of planning and environmental criteria, including potential impacts landowners and the wider community. The SDR (Document reference 5.10, DCO Volume 5) and ES Chapter 4 Consideration of alternatives, Volume I (Document reference 6.1, DCO Volume 6) detail the other options considered and sets out the process the Applicant has taken to refine the Project.</p>
60	15 July 2025 Project Update Meeting	Next meetings	The Planning Inspectorate advised that project update meetings originally requested for September and October should be rescheduled to align with the Applicant's revised pre-application timeline. It requested submission of an updated Programme Document reflecting scheme evolution, with both clean and tracked-change versions provided to clearly show amendments.	The meetings were rescheduled for November 2025 to reflect the revised timeline, and an updated Programme Document was submitted to the Planning Inspectorate on 17 October 2025, highlighting relevant document changes, and posted on the Applicant's website on 15 October 2025.

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
61	15 July 2025 Project Update Meeting	Submitting draft docs	The Planning Inspectorate advised the Applicant to follow the updated guidance on submitting application documents, confirming that the same approach should be applied to the submission of draft documents and the AoCM.	<p>The Applicant noted the advice. The draft documents were submitted to the Planning Inspectorate in September 2025 in accordance with relevant guidance and as agreed with the Planning Inspectorate.</p> <p>The AoCM was not issued in draft for review by the Planning Inspectorate prior to submission as this is not required by advice or guidance. The AoCM was submitted to the Planning Inspectorate on 29 October 2025. The timing of this submission was early enough for the Applicant to consider if additional engagement may be needed, but sufficiently towards the end of the pre-application stage to assess the adequacy of the consultation that has been undertaken.</p>
62	22 October 2025 Draft documents review	Email	Please can the Applicant provide written comments by 29 October 2025 or alternatively this can discuss this at the next Project Update Meeting next month.	The Applicant confirmed the feedback would be discussed at the Project Update Meeting on 7 November 2025.
63	22 October 2025	General	The HRA – Stage 2 AA and MCZ – Stage 1 Assessment (the HRA and MCZ	The Applicant proposes to seek a deemed marine licence through the

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
	Draft documents review	(1)	<p>Report) refers at paragraph 1.3.5 to proposed development works that would require a marine licence, including pipeline installation under the Hermitage Stream and construction of the WRP SuDS outfall. It states that the Planning Act 2008 (PA 2008) provides for a development consent order (dDCO) to include a deemed marine licence (DML).</p> <p>However, the dDCO, Explanatory Memorandum (EM) and ES Description of the Proposed Development Chapter (the ES Project Description Chapter) submitted for draft document review make no reference to the requirement for a marine licence. The dDCO does not include drafting for a DML. It is unclear from the documents submitted as to the applicant's proposed approach to marine licensing. The Planning Inspectorate advises that if a marine licence is needed, the proposed approach to securing the licence this should be reflected consistently in all relevant draft DCO application documentation. If a DML is sought, the dDCO and EM drafting must be updated accordingly and the assessment required to support this must</p>	<p>dDCO. At the time of the Planning Inspectorate's draft document reviews, discussions were underway with the MMO in relation to the proposed terms of the DML and as such it was not considered appropriate to include an immature draft of the DML in the version of the dDCO provided.</p> <p>The dDCO (Document reference 3.1, DCO Volume 3) has been updated to include the DML in Schedule 9. The Explanatory Memorandum (Document reference 3.2, DCO Volume 3) has also been updated to reflect the schedule in the dDCO (Document reference 3.1, DCO Volume 3).</p> <p>The DML within the dDCO (Document reference 3.1, DCO Volume 3) sets out the works that would require a marine licence, and these works have been assessed in the ES (Document reference 6.1, DCO Volume 6).</p> <p>The Statement of Engagement (Document reference 5.12, DCO Volume 5) and relevant Draft Statement of Common Ground - MMO (Document reference 5.8, DCO Volume 5) include a</p>

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
			be provided. Any consultation with relevant consultation bodies in respect of this matter should be summarised in the relevant dDCO application documentation, including the status of any discussion or application for a marine licence.	summary of engagement with the MMO in relation to the DML.
64	22 October 2025 Draft documents review	dDCO (1) Schedule 1	Multiple instances of 'as shown sheet' where the word 'on' is missing	The Applicant noted this advice. The dDCO (Document reference 3.1, DCO Volume 3) was proofread before submission.
65	22 October 2025 Draft documents review	dDCO (2) Schedule 1	No reference is made in Schedule 1 Authorised Development to the operational phase of the proposed development, for example the proposed output from the WRP (recycled and reject water) or the volume of recycled water transferred between WRP, Havant Thicket Reservoir and Otterbourne Water Supply Works (WSW) during different operating scenarios. Nor is this discussed in the EM. Noting that the ES Project Description Chapter sets out these details as the basis of the assessment work, it should be confirmed if controls are required to restrict these matters and,	The Applicant has carefully considered this advice and has updated its Explanatory Memorandum (Document reference 3.2, DCO Volume 3) accordingly. In summary, it considers that it is not appropriate to impose any limitation or requirement on the operation of the authorised development in terms of flows as these would be appropriately regulated through water discharge activity environmental permitting and through abstraction licensing.

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
			if so, how these are proposed to be secured.	
66	22 October 2025 Draft documents review	dDCO (3) Schedule 1	Works No. 6I, 6O, 6AI, 6AO, 7I & 7O are missing; assumed omitted to avoid the potential for confusion with numbering? If this is intentional then it should be clearly explained in the application.	Yes, "I" and "O" lettered sub-works were omitted to avoid confusion with similarly appearing numerals. The Applicant has consolidated Work No. 6 into a single numbered work and so the issue of the omission of particular characters in the sequence of Work Nos. no longer arises.
67	22 October 2025 Draft documents review	dDCO (4)	The number of Works where the activities are the same seem excessive. Areas and location are different. For example, Works 5A-E are virtually identical apart from which sheets they are shown on; the same can be said of Works 6A-AZ and 7A-AC. The Planning Inspectorate suggest the applicant consider the most appropriate course of action to avoid confusion for stakeholders.	Work No. 5 describes the various above ground plant required for the Project. While each of the sub-works are similar, their differences are important to consider. Work Nos. 6 and 7 describe temporary construction compounds and environmental mitigation areas respectively. At this draft stage the Applicant considered that it was helpful to be able to separately identify these works but acknowledges that an inevitable consequence of this approach is a repetitive Schedule 1. The Applicant has considered this and consolidated these numbered works where this would simplify, but without removing necessary detail, as they appear in Schedule 1 and on the Works Plans.

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
68	22 October 2025 Draft documents review	dDCO (5) Schedule 2	The EM states that design parameters for above ground infrastructure, including vertical limits of deviation (LoD), would be set out in Design Principles. Compliance with these would be secured through a requirement in Schedule 2. The draft Design Principles and draft wording of Schedule 2 have not been provided so it is not possible to provide substantive comment. However, the Planning Inspectorate advises that the design parameters and LoD must be clearly specified and should be consistent with what has been assessed in the ES.	Noted, and the Applicant can confirm the approach suggested is the approach taken. The Design Principles contained in the Design Principles Document (Document reference 5.11, DCO Volume 5) set out the General and Site-Specific Design Principles with which the detailed design of the Project will be in accordance with. This includes the maximum vertical parameters for above ground structures and the minimum below ground depths for underground pipelines. This is secured by a relevant requirement in Schedule 2 of the dDCO (Document reference 3.1, DCO Volume 3). The parameters in the Design Principles Document (Document reference 5.11, DCO Volume 5) are consistent with what has been assessed in the ES, as evidenced in ES Chapter 3 Description of the Proposed Development, Volume I (Document reference 6.1, DCO Volume 6).
69	22 October 2025	dDCO (6) Schedule 2A	This seems to imply that private property including dwellings could be subject to Compulsory Acquisition powers and should be clarified.	Schedule 6 to the dDCO (Document reference 3.1, DCO Volume 3) includes standard and well precedented provisions necessary to make other

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
	Draft documents review			provisions of compulsory purchase legislation compatible with the provisions of the dDCO that would authorise the creation and acquisition of new rights. Paragraph 8 of Schedule 6 to the dDCO includes provisions the effect of which is to apply the counter-notice procedure in Schedule 2A to the Compulsory Purchase Act 1965 (which applies only where land is acquired) to cases where rights are compulsorily acquired pursuant to the dDCO. Without this modification the counter-notice procedure would not be available to persons where rights are acquired pursuant to the dDCO.
70	22 October 2025 Draft documents review	dDCO (7) Schedule 9	The protective provisions do not appear to include the requirements of all the statutory undertakers likely to be involved in the proposed development. The Planning Inspectorate requests an update on protective provisions be given when the application is submitted.	The protective provisions in Schedule 9 to the dDCO (Document reference 3.1, DCO Volume 3) reflect negotiations with relevant undertakers that have requested bespoke protective provisions. The application includes an update on the status of negotiations in respect of protective provisions.
71	22 October 2025	dDCO	The definition of environmental statement refers to Schedule 9 as the location of documents to be certified. Based on the	The dDCO was fully proof-read to ensure that the definition of "environmental statement" refers to the correct

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
	Draft documents review	(9) Article 2(1)	submitted dDCO, the correct schedule is Schedule 10. The definition of environmental statement does not currently provide for updated iterations or errata documents that may be required during examination. The applicant should consider how this would be accommodated to ensure that all documents comprising the final ES would be identified.	Schedule. Schedule 10 was updated, as required, to identify any revised iterations produced during the Examination, ensuring that all components of the final ES are clearly captured and certified.
72	22 October 2025 Draft documents review	dDCO (10) Article 2(1) Article 2(7) Article 6(3) Schedule 1	The phrasing "...materially new or materially different environmental effects in comparison with those reported in the environmental statement..." is considered weak. The applicant should amend this wording to "materially new or materially worse to those identified in the environmental statement". Materially different does not allow for a substantial change to be made which would result in a betterment of the scheme.	The "materially new or materially different environmental effects in comparison with those reported in the environmental statement" formulation is widely precedented. Indeed, several Secretaries of State have replaced alternative formulations (including the one suggested in the Section 51 advice) with this formulation when making DCOs. In any event, the concern underlying the advice does not arise in this instance as article 2(7) (which again is precedented in a number of recent DCOs) ensures the formulation does not stand in the way of improved environmental outcomes.

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
73	22 October 2025 Draft documents review	dDCO (11) Articles 3 & 4	The dDCO includes powers to construct and maintain the development but does not seem to include powers to operate or decommission the development or establish the life of the development. The powers in the dDCO should align with what has been assessed in the ES. The Planning Inspectorate has provided comments on the ES Project Description Chapter below in relation to the approach to operation and decommissioning of the proposed development.	The Applicant is not seeking a time-limited DCO. As such there is no need for the dDCO (Document reference 3.1, DCO Volume 3) to include powers relating to decommissioning and consent to decommission is therefore not sought. The Order does include powers to operate and maintain the development.
74	22 October 2025 Draft documents review	dDCO (12) Article 5	Ensures power to maintain drainage works rests with existing persons responsible unless by agreement otherwise. Need to explore what happens if the applicant alters drainage works that already rests within their authority and who ultimately has responsibility for the drainage, the applicant developer, the existing water authority, or are they legally one and the same.	Article 5 simply operates to maintain the status quo. If the Applicant was previously liable to maintain a drainage work, then it would continue to be so unless it entered into an agreement with another person for that person to maintain that drainage work.
75	22 October 2025	dDCO (13) Article 6	This Article would set horizontal LoD by reference to the works plans. As only a sample works plan has been submitted for draft document review it is not possible for the Planning Inspectorate to	The Applicant has included specific LoD within the limits of Work No. 4 for the pipeline comprised in Work No. 4(a), because of the need for flexibility to be proportionate. Where it has been able to

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
	Draft documents review		provide substantive comment on the operation of this provision. However, in general the Planning Inspectorate advises that flexibility should be narrowed as far as possible and that final LoD proposed should be fully justified. For example, it is not clear why it is possible to further reduce the LoD for Work No. 4(a) (35km pipeline) in some locations but not all.	narrow down the limits of the final location of the pipeline, it has done so. This is not possible across all areas for a range of factors. These include areas where there are particular engineering constraints, for example, where the Pipeline is in proximity to other works or needs to navigate bends or corners or where the Applicant is seeking to reduce impacts on landowners at the detailed design stage but does not currently have a full understanding of future land use to achieve this. In any event, the EIA considers the full range of the LoD that will be the subject of the application for development consent.
76	22 October 2025 Draft documents review	dDCO (14) Article 8	The Explanatory Memorandum (EM) seems to suggest that any transfer of benefit of the dDCO would require SoS consent, but this is not identified in the dDCO.	There was a transcription error in article 8 whereby the paragraph requiring Secretary of State consent to the transfer of the benefit of the DCO has been inadvertently omitted. This has been corrected.
77	22 October 2025	dDCO (15) Article 10	This gives powers over all streets within the order limits and is not defined within the accompanying schedule, but Article 21 excludes these rights within private	As a statutory water undertaker, the Applicant already possesses the statutory right to carry out street works. As such, it is not considered to be necessary or proportionate to identify the

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
	Draft documents review		streets within the order limits. Is this a contradiction?	<p>locations of street works and feature them in a Schedule. The power in article 10 is included so that there is clarity that such street works would be conducted pursuant to the DCO rather than to the Applicant's existing statutory rights.</p> <p>Article 21 relates to powers to survey which is distinct and different to the powers to carry out street works conferred by article 10. Street works would need to be conducted in line with the existing statutory regime for street works set out in Part 3 of the New Roads and Street Works Act 1991 and related legislation. Surveys under article 21 would not be subject to the 1991 Act and so it is appropriate for there to be a degree of additional control over the exercise of that power. There is therefore no contradiction between the provisions of these articles.</p>
78	22 October 2025 Draft documents review	dDCO (16) Article 19 (2) & (8)	This might cause difficulties for the Applicant (Southern Water) in relation to connections to their own apparatus.	The Applicant has considered this advice but does not consider there to be any material difficulty caused by these provisions in relation to connections to its own sewerage apparatus.

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
79	22 October 2025 Draft documents review	dDCO (17) Article 20	This Article provides powers for the undertaker to carry out protective works to any building affected by the proposed development, including underpinning and strengthening. These works should be described in the ES Project Description Chapter and any likely significant effects arising should be assessed in the ES.	The provisions of this article are included on a precautionary basis in order to be able to take remedial action to protect buildings should it be necessary. These works are not described in ES Chapter 3 Description of the Proposed Development, Volume I (Document reference 6.1, DCO Volume 6) as no remedial works are proposed or anticipated to be required.
80	22 October 2025 Draft documents review	dDCO (18) Article 22	Seeks the power to remove human remains encountered during the works and change the existing legal process under Burial Act 1857 to notify and re-inter. Recently the SoS has been not agreeing to the inclusion of these powers for recent dDCOs as the existing process is not onerous in isolation (see The Gate Burton Energy Park Order 2024, The Tillbridge Solar Order 2025). However, for long linear schemes such as this it may be appropriate to request this power due to the presence of unforeseen burial grounds along the route.	The Applicant is aware of the decisions referred to and the Secretary of State for the Department for Net Zero and Energy Security's approach in those cases. The Applicant notes that it is promoting an Order that would be determined by the Secretary of State for Defra who may have different drafting preferences and that the Project includes long linear underground elements where the risk of encountering previously unknown burial grounds is potentially greater.
81	22 October 2025	dDCO	The wording of this Article is too wide-ranging, and with the incorrect balance, for the apparent intended purpose. The	The Applicant has developed its proposed approach to the scope, and appropriate restraints to the exercise

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
	Draft documents review	(19) Article 23(1)	premise should be that tree preservation order (TPO) trees should not be felled or lopped, unless in certain circumstances. The applicant should consider rewording to limit the circumstances in which TPO trees can be felled, lopped or subject to cutting back of roots.	of the power which have been limited by express reference to identified trees and areas (including TPO) in a supporting schedule.
82	22 October 2025 Draft documents review	dDCO (20) Article 25	Includes parts from the Acquisition of Land Act 1981 relating to mineral rights over land acquired. EM seems to imply this is to avoid acquisition of mineral rights of affected parties but the specific reason for its inclusion needs to be clarified.	This is further clarified in the Explanatory Memorandum (Document reference 3.2, DCO Volume 3). The authorised development affects land that is known to contain minerals and so it is appropriate for the mining code to be incorporated within the Order.
83	22 October 2025 Draft documents review	dDCO (21) Article 39	Seeks the power to acquire special category land and offset with replacement land. The location of the replacement land is not identified in any accompanying Schedules.	The drafting associated with the replacement of special category land is no longer included in the dDCO (Document reference 3.1, DCO Volume 3). The Statement of Reasons (Document reference 4.1, DCO Volume 4) accompanying the application for development consent sets out in detail the Project's interaction with special category land.
84	22 October 2025	dDCO	This Article seeks to disapply sections 28E and 28H of the Wildlife and	The Applicant has considered this advice but nonetheless remains of the view that

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
	Draft documents review	(22) Article 44(1)	<p>Countryside Act 1981, relating to duties in relation to sites of special scientific interest (SSSI) and carrying out of duties by statutory undertakers, including notification to NE of operations likely to cause damage to a SSSI. The EM states that this is justified as the proposed development has been subject to extensive assessment and there would be suitable controls in an environmental management plan. It notes precedent in 2 made highway dDCOs. The Planning Inspectorate notes that the precedent dDCOs disapplied section 28E and not section 28H. In respect of the A14 Cambridge to Huntingdon Improvement Scheme dDCO there was a requirement in the dDCO in respect of mitigating effects to the affected SSSI.</p> <p>The Planning Inspectorate also notes that there is precedent in several other made dDCOs, including Lower Thames Crossing (LTC) and A417 Missing Link where the applicant's proposed disapplication of these provisions was removed. NE's advice on LTC was that the provisions should only be disapplied in exceptional circumstances. It referred</p>	<p>the proposed disapplications are appropriate, are consistent with the single consenting regime ethos of the PA 2008 and when seen in the context of the suite of measures regulating the effects of the Project, would not lead to any unacceptable damage to SSSIs. The justification and appropriateness of this provision is explained in more detail in the Explanatory Memorandum (Document reference 3.2, DCO Volume 3).</p>

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
			<p>to Annex C of the Planning Inspectorate's advice page NSIPs: Advice on working with public bodies in the infrastructure planning process, which states that: "In relation to applications where there may be potential impacts on SSSIs both the Secretary of State and NE have duties under the WCA. Under 28(I), the Secretary of State or minister must notify NE before authorising the carrying out of operations likely to damage the interest features of a SSSI." It considered that the application documents did not provide sufficient certainty about works that could adversely affect SSSI features. It was also concerned that potential future SSSIs could not lawfully be treated as land within an SSSI at recommendation and decision stage, and therefore the statutory provisions should be retained to enable NE to have control over works on land if it were later designated. The ExA recommended that the sections disapplying these provisions were removed from the dDCO based on residual concern that there could be non-policy compliant adverse effects to a SSSI and that the applicant's mitigation</p>	

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
			<p>did not fully ensure no harm to a potential SSSI notification. The sections were removed in the made dDCO. Noting the above, the Planning Inspectorate does not consider that sufficient justification has been presented for including this provision. No precedent is given for the removal of section 28H and it is not explained why highways dDCOs provide a suitable precedent for a water infrastructure project in respect of section 28E. It is unclear which existing or potential SSSI(s) could be affected by the proposed development, the nature of the operations that could cause damage and if these have been subject to any assessment in the ES. It is also therefore not clear how potential impacts could be managed. The Applicant should consider removing this provision from the dDCO or it should provide a clearer and more detailed justification for its inclusion based on the specific circumstances of the proposed development.</p>	
85	22 October 2025	dDCO (23) Article 44(1)	<p>This Article also seeks to disapply several provisions relating to drainage including consents to be obtained from the EA and drainage bodies. The EM</p>	<p>The advice is noted and protective provisions for the relevant consenting authorities are included. Where final agreement has not been reached on the</p>

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
	Draft documents review		states that the requirement for separate consent would be replaced by protective provisions to be agreed with the relevant bodies and set out in Schedule 9 of the dDCO, which the applicant considers would be achieved during examination. No drafting is provided in Schedule 9 as submitted for draft document review.	form of protective provisions this is the subject on ongoing engagement.
86	22 October 2025 Draft documents review	dDCO (24) Article 47	Seeks to modify the Havant Thicket Reservoir planning permission but is blank. The Planning Inspectorate would have welcomed being given sight of this prior to submission of the application, as it is presumed to be novel and could have led to significant advice.	The Applicant has noted that further to Havant Thicket Reservoir and the related pipeline originally receiving planning permission on 15 October 2021, subsequent planning applications have been granted, including under section 73 of the 1990 Act to facilitate various changes to Havant Thicket Reservoir's detailed design, and to permit twin pipelines to be built from Havant Thicket Reservoir to Bedhampton Springs. The last of these was formally issued on 22 September 2025. Condition 36 of that last permission reads: <i>"Condition 36: Use of Raw Water Only The approved pipelines shall only be used to transport raw spring water and</i>

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				<p><i>not for the use of any treated recycled water.</i></p> <p><i>Reasons: To ensure the proposed development meets the description of development and the approved reservoir project (under S73 Application Havant Borough Council Ref APPlots/24/00312 and East Hampshire District Council ref 51680/012 which allows the storage of raw water only."</i></p> <p>The Applicant has now considered the DCO drafting that it considers is appropriate in relation to these planning permissions and this is set out in article 5, which is intended to ensure that the Havant Thicket Reservoir and related infrastructure including the twin pipelines can be utilised by the Project to hold and convey a mixture of water comprised from the original spring water source and the recycled water produced by the Project.</p> <p>The DCO drafting will ensure that the Applicant's use of Havant Thicket Reservoir infrastructure under the DCO does not place it, or Portsmouth Water, in breach of planning control or</p>

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				Portsmouth Water in breach of any planning obligations. As the authorisation contained in this article is strictly limited to the Applicant's use and enjoyment of Havant Thicket Reservoir infrastructure, any other breach of planning control or planning obligations (for example, relating to the physical form of the Havant Thicket Reservoir infrastructure or the means by which it will be constructed) would not be affected by this provision. The drafting also ensures that any inconsistency in a planning permission for Havant Thicket Reservoir infrastructure with the Applicant's use of it under the DCO article does not prejudice reliance by Portsmouth Water on that planning permission.
87	22 October 2025 Draft documents review	Draft dDCO explanatory memorandum (1)	The Applicant should ensure that plots listed on the land plans are recorded in the dDCO	There is no overall requirement for the dDCO to include all plots identified on land plans on the face of the Order. Where limitations apply directly these are listed and identified in the relevant schedules. All plots are identified in the Book of Reference (Document reference 4.3, DCO Volume 4), which will be a

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				certified document therefore ensuring all plots are recorded.
88	22 October 2025 Draft documents review	Draft dDCO explanatory memorandum (2) Para 2	Implies operation of the development but the dDCO does not appear to seek this. Also does not imply the life of the development and duty to decommission at end of life.	Please see the response to dDCO (11).
89	22 October 2025 Draft documents review	Draft dDCO explanatory memorandum (3) Para 5.5	Suggests compliance with the Design Principles is secured through Schedule 2 in the dDCO but this is currently blank.	The Applicant notes this point and confirms that Schedule 2 was updated.
90	22 October 2025 Draft documents review	Draft dDCO explanatory memorandum (4) Para 8.1	Suggests power to operate but is not included in the dDCO.	Please see the response to dDCO (2).
91	22 October 2025 Draft documents review	Draft dDCO explanatory memorandum (5) Para 8.4	Relates to Article 5 and seeks to clarify that applicant can alter existing drainage but not be responsible for its continued maintenance unless agreed.	Please see the response to Draft development consent order (dDCO) (12).

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
92	22 October 2025 Draft documents review	Draft dDCO explanatory memorandum (6) Para 8.13	Suggests SoS has power to consent transfer, but this is not explicitly written into the dDCO.	Please see the response to dDCO (14).
93	22 October 2025 Draft documents review	Draft dDCO explanatory memorandum (7) Para 11.3	Relating to exemption of power to acquire mineral rights and need to ensure this is the case.	Please see the response to dDCO (20).
94	22 October 2025 Draft documents review	Draft dDCO explanatory memorandum (8) Para 11.26	A drafting note is included to explain why potentially rights over special category land may be required.	The Applicant has noted this advice on special category land. Please see the response in row reference 83.
95	22 October 2025 Draft documents review	Draft dDCO explanatory memorandum (9) Para 12.19	Is blank but a drafting note explains that the applicant is awaiting agreement of the s106 conditions relating to the Havant Thicket reservoir so they can then determine which conditions to modify if required within this application.	Please see the response to dDCO (24).
96	22 October 2025	Draft dDCO explanatory memorandum	Suggests protective provisions are included for a range of statutory	Please see the responses to Draft development consent order (dDCO) (7) and (23) above.

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	Draft documents review	(10) Para 12.22	undertakers but presently the dDCO is blank in this Schedule.	
97	22 October 2025 Draft documents review	Draft dDCO explanatory memorandum (11) Para 13	Explains that the Schedules are still to be populated.	The Applicant has noted this comment on the dDCO.
98	22 October 2025 Draft documents review	Draft sample works plans and land plans (1) Land plans	The Planning Inspectorate cannot provide detailed comments as the plans are not complete. If over 3 sheets a key plan will need to be included. Cover page will also need to be added to reference the document description, revision number and reference number.	Noted, the Applicant has ensured plans adhere to this advice.
99	22 October 2025 Draft documents review	Draft sample works plans and land plans (2) Work Plans	The Planning Inspectorate cannot provide detailed comments as the plans are not complete.	The Applicant has noted this comment. Updated documents have been submitted with the DCO application. Please see Works plans (Document reference 2.3, DCO Volume 2).
100	22 October 2025	Draft HRA Report	The HRA and MCZ Report only includes the stage 2 assessment for adverse	The Stage 1 screening document has been appended to the final version of the

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
	Draft documents review	(1) General	effects on integrity (AEol). The stage 1 screening report is a separate document, which has not been submitted for review, although the screening conclusions are summarised in section 3 of the HRA and MCZ Report. If separate reports for stage 1 and stage 2 of the HRA are submitted with the DCO application, any cross-referencing between the reports should use specific paragraph numbers to ensure the relevant evidence can be located.	HRA - Stage 2 AA and MCZ - Stage 1 Assessment (Document reference 5.2, DCO Volume 5) submitted with the DCO application. Cross-references have been updated to include paragraph numbers where relevant.
101	22 October 2025 Draft documents review	Draft HRA Report (2) General	For some impact pathways, the potential effects are described generally rather than being attributed to specific qualifying features of the European site. It must be clear which qualifying features screened in for LSE are being considered in the assessment and the AEol conclusion reached for each feature. If the impact pathway relates to all qualifying features of the European site this should be stated.	Noted. This has been updated in the final version of the HRA - Stage 2 AA and MCZ - Stage 1 Assessment (Document reference 5.2, DCO Volume 5) submitted with the DCO application.
102	22 October 2025	Draft HRA Report (3) General	In-combination effects have been considered in relation to emissions to air from the proposed development and other plans and projects in section 5.3 of	The HRA - Stage 2 AA and MCZ - Stage 1 Assessment (Document reference 5.2, DCO Volume 5) was updated to clearly set out the scope and methodology for

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
	Draft documents review		<p>the HRA and MCZ Report. However, the in-combination method and a list of relevant plans and projects are not included. The Planning Inspectorate advises that the HRA should explain the scope and method of the in-combination assessment, including any zone of influence (Zol) that has been applied for the purpose of selecting plans and projects. An indication of whether the list has been agreed with relevant consultation bodies should be provided. Consideration should be given to plans and projects within the host local authority, as well as authorities within the defined Zol(s), not just adjacent authorities. The conclusions should address AEol from the proposed development alone or in combination with other plans and projects (unless all other impact pathways were screened out for the proposed development in combination in the HRA stage 1 assessment).</p>	<p>the in combination assessment, including the zone(s) of influence used to identify relevant plans and projects. The basis for plan and project selection is outlined in the ES Chapter 20, Cumulative and in-combination effects, Volume I (Document reference 6.1, DCO Volume 6). Developments are presented in ES Appendix 20.1 List of 'other developments' – longlist and shortlist, Volume II (Document reference 6.2, DCO Volume 6). The list of 'other developments' presented in ES Chapter 20 Cumulative and in-combination effects, Volume I (Document reference 6.1, DCO Volume 6) which was informed by the Zol for ecological receptors and included Habitats Sites, was reviewed in the context of the HRA - Stage 2 AA and MCZ - Stage 1 Assessment (Document reference 5.2, DCO Volume 5). An assessment of the potential for in-combination effects on the Habitats Sites assessed for the Project from relevant plans and projects was included. In addition to the assessment of 'other existing development and/or approved development', the assessment</p>

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				considered the potential for in-combination effects on Habitats Sites associated with other projects proposed by the Applicant and Portsmouth Water. Consideration was given to the host local authority and all authorities within the defined Zols, and engagement with relevant consultation bodies was undertaken where applicable. The conclusions explicitly address whether adverse effects on integrity arise from the proposed development alone or in combination with other plans and projects, having regard to the Stage 1 screening outcomes.
103	22 October 2025 Draft documents review	Draft HRA Report (4) General	A conclusion of no AEoI of several European sites including Chichester and Langstone Harbours SPA and Ramsar site and Solent Maritime Special Area of Conservation (SAC) is reached in respect of potential habitat loss and fragmentation arising from construction of trenchless crossings beneath the Hermitage Stream based on effects being temporary but the duration and recovery time from water degradation and	The Applicant confirms that advice provided by the Planning Inspectorate in its review of Autumn 2025 has been reviewed. Following discussion with the Planning Inspectorate, appropriate changes (including those relating to the trenchless crossing of the Hermitage Stream) addressing this point have been made to the HRA - Stage 2 AA and MCZ - Stage 1 Assessment (Document

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			smothering is not stated. This should be clarified.	reference 5.2, DCO Volume 5) submitted with the DCO application.
104	22 October 2025 Draft documents review	Draft HRA Report (5) General	<p>Paragraphs 5.3.141 to 5.3.157, 5.3.218 to 5.3.234 and 5.3.279 to 5.3.295 assess potential for AEoI of Chichester and Langstone Harbours SPA and Ramsar site and Solent Maritime SAC from waterborne pollution during operation arising from impacts associated with discharges into Havant Thicket Reservoir.</p> <p>The presentation of the modelling results and the implications for affected waterbodies leading to a conclusion of no change to nitrate levels and no deterioration from existing levels of dissolved oxygen in Langstone Harbour is difficult to follow due to the volume of information presented and apparent inconsistencies in the text. For example, at paragraph 5.3.142 it states that the modelling considered alternative scenarios with phosphorus treatment at the WRP but at paragraph 5.3.153 it states that this embedded mitigation is not represented in the outputs. Comparison of increased concentrations</p>	The Applicant has reviewed the presentation of the water quality modelling information, including addressing inconsistencies, adding tables, to ensure clarity across all relevant qualifying features in the HRA - Stage 2 AA and MCZ - Stage 1 Assessment (Document reference 5.2, DCO Volume 5) submitted with the DCO application.

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
			of water quality parameters between Hermitage Stream and Riders Lane Stream are made, noting the latter would be more affected but it is unclear why this is relevant to the conclusion if both watercourses flow into the European sites. The same information is repeated in the later paragraphs for the Ramsar site and Solent Maritime SAC. The Planning Inspectorate advises that these sections would benefit from improved clarity and explanation of how the modelling outputs relate to the qualifying features being assessed. The applicant should also consider whether there could be consolidation of the text across the 3 European sites, whilst maintaining clear conclusions for each. The use of tables may assist.	
105	22 October 2025 Draft documents review	Draft HRA Report (6) Para 1.2.6	It states that no demolition is proposed as part of the proposed development. The Planning Inspectorate notes, however, that the dDCO gives powers for demolition in several places (items (b)(i) and (viii) of the Ancillary Works in Schedule 1). This should be clarified and	The Applicant has ensured clarity around the potential for demolition, and this is included within the HRA - Stage 2 AA and MCZ - Stage 1 Assessment (Document reference 5.2, DCO Volume 5) submitted with the DCO application.

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
			the HRA and MCZ Report amended as required.	
106	22 October 2025 Draft documents review	Draft HRA Report (7) Section 2.5	Detailed information about how the Zol have been determined are stated to be presented in technical appendices forming part of the ES. These do not form part of the draft document review, so the Planning Inspectorate is not able to provide substantive comments but would note that it should be clear how the Zol has been selected for the purposes of the HRA. Specific section and paragraph cross-referencing should be provided to aid the reader in locating HRA-related information that is not within the HRA and MCZ Report.	The Applicant confirms that advice provided by the Inspectorate in its review of Autumn 2025 has been reviewed. Following discussion with the Inspectorate, appropriate changes (including those relating to the selection of the Zol and ensuring clarity of cross referencing to other DCO documents) have been made to the HRA - Stage 2 AA and MCZ - Stage 1 Assessment (Document reference 5.2, DCO Volume 5) submitted with the DCO application.
107	22 October 2025 Draft documents review	Draft HRA Report (8) Section 2.6 Appendix A	Section 2.6 states that NE, the EA and the MMO have been consulted throughout the HRA process, including review of draft reports. The HRA and MCZ Report states that comments received are included in Appendix A but appendices have not been submitted at draft document review stage. The Planning Inspectorate advises that the dDCO application version of the HRA report should include evidence of	Noted. Appendix A submitted with the DCO application now contains the Screening Report for the Project, undertaken in 2024. The Statement of Common Ground (Document reference 5.8, DCO Volume 5), submitted with the DCO application, and referenced within the HRA, includes evidence of agreements on scope, methodology, interpretation and conclusions with

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
			agreement with relevant bodies including NE as the appropriate nature conservation body, as to the scope, methodologies, interpretation, and conclusions of the screening assessment.	relevant bodies including NE, the EA and the MMO.
108	22 October 2025 Draft documents review	Draft HRA Report (9) Para 3.1.1 Table 3-1	The Planning Inspectorate notes that HRA and MCZ assessments are separate processes subject to different legal tests. As such, it is not clear why Bembridge MCZ is included in the list of sites taken forward from HRA stage 1 screening assessment. The Planning Inspectorate advises that screening conclusions relating to the MCZ are considered separately to avoid confusion for the reader.	The Applicant understands that the HRA and MCZ assessments are separate processes subject to different legal tests. To ensure clarity, the HRA - Stage 2 AA and MCZ - Stage 1 Assessment (Document reference 5.2, DCO Volume 5) has been amended to provide a greater degree of separation. Bembridge MCZ is no longer included in the list of sites taken forward from the HRA stage 1 screening assessment and is listed separately in the MCZ Assessment section of the document.
109	22 October 2025 Draft documents review	Draft HRA Report (10) Table 3-1	Table 3-1 provides a summary of the screening conclusions for likely significant effects (LSE), but no summary table is provided for stage 2 AEol conclusions. The Planning Inspectorate refers the applicant to the Planning Inspectorate's advice page Nationally Significant Infrastructure Projects: Advice	A summary table for the Stage 2 AEol conclusion has been included in the HRA - Stage 2 AA and MCZ - Stage 1 Assessment (Document reference 5.2, DCO Volume 5) submitted with the DCO application.

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
			on Habitats Regulations Assessments, which requires a summary table of all European sites and qualifying features and each pathway of effect considered at each HRA stage for each phase of the proposed development. A summary table for stage 2 should be included in the HRA report accordingly.	
110	22 October 2025 Draft documents review	Draft HRA Report (11) Table 3-1 Section 5.3	Table 3-1 states that spread of INNS during operation is screened in as an impact pathway to several European sites but no supporting assessment is provided in section 5.3 of the HRA and MCZ Report. An assessment is only provided for the construction phase. This should be clarified and corrected as required.	The table has been reviewed and updated to ensure consistency across all sections. Pathways for INNS during operation have been clarified in the final document.
111	22 October 2025 Draft documents review	Draft HRA Report (12) Para 3.2.3	The HRA and MCZ Report refers to potential for several operational emergency scenarios to contribute to impact pathways to sediment scour, spread of INNS and waterborne pollution, but states that these are operationally exceptional and not likely to occur, so are not considered further. The Planning Inspectorate advises that if the possibility of these emergency	The Applicant discussed this point with the Planning Inspectorate on 7 November 2025 and received a post-meeting note on 14 January 2026 stating: <i>'The Inspectorate advised that the Applicant could consider two approaches to this matter in the HRA. It could demonstrate in the HRA report that NE agreed that further assessment of the</i>

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
			scenarios occurring cannot be excluded, on a precautionary basis the HRA stage 2 assessment must consider these within relevant impact pathways to determine if there could be an AEoI of the relevant European sites. Mitigation should be identified as needed.	<p><i>operational emergency scenarios is not required, or it could identify mitigation proposed to address risks associated with the scenarios and/ or remediation as part of an assessment at stage 2.'</i></p> <p>The Applicant can confirm that its HRA approach has been discussed in detail with NE. NE has agreed that the further assessment of the operational emergency scenarios is not required. This is confirmed in the Draft Statement of Common Ground – NE (Document reference 5.8, DCO Volume 5) submitted with the DCO application and is included in the HRA - Stage 2 AA and MCZ - Stage 1 Assessment (Document reference 5.2, DCO Volume 5).</p>
112	22 October 2025 Draft documents review	Draft HRA Report (13) Paras 3.2.4, 4.1.56, 4.1.60 and 5.3.85	The HRA and MCZ Report includes a placeholder pending completion of further work in relation to potential INNS pathways through waste streams and overflows at Otterbourne WSW and Chickenhall wastewater treatment works (WTW) during operation of the proposed development. The Planning Inspectorate advises that the DCO application version of the HRA and MCZ Report should be	Potential impacts from INNS have been fully assessed and mitigation proposed in the HRA - Stage 2 AA and MCZ - Stage 1 Assessment (Document reference 5.2, DCO Volume 5) submitted with the DCO application. The proposed INNS Treatment at Otterbourne WSW forms part of the mitigation for the Project and is included within the Order

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
			<p>updated with full details of this impact pathway, including the stage 2 assessment conclusions and confirmation of mitigation proposed. It should explain the extent to which this has been agreed with relevant consultation bodies. If it is not possible to rule out AEol of the River Itchen SAC, a derogation case should be provided. Reference is made to potential mitigation through design as part of upgrade works to the Otterbourne WSW. Based on information presented in the ES Project Description Chapter (see comment 12 on that document below), the Planning Inspectorate understands that proposed upgrade works at Otterbourne WSW would be progressed separately to the dDCO. If these works form part of the mitigation for the proposed development, it must be clear how it is proposed to ensure they would be complete prior to the proposed development becoming operational.</p>	<p>Limits and will be consented via the DCO. The INNS Treatment would be complete prior to the Project becoming operational. This approach has been agreed with NE and the EA and is reflected in the NE and Draft Statement of Common Ground – EA (Document reference 5.8, DCO Volume 5).</p>
113	22 October 2025	Draft HRA Report	<p>Embedded and good practice measures proposed to avoid or minimise risks of impacts to the European sites, and qualifying habitats and species outside of</p>	<p>The HRA - Stage 2 AA and MCZ - Stage 1 Assessment (Document reference 5.2, DCO Volume 5) confirms the mitigation commitments relied upon to avoid AEol</p>

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	Draft documents review	(14) Section 4.1	the European sites and MCZ are described. In some instances, these appear to be broader or more generic measures rather than specific to the HRA or MCZ assessment, and the caveat "as far as reasonably practicable" is used. It should be clear which mitigation measures are relied upon to avoid AEoI of the European sites assessed. Where measures are relied upon, it must be clear that they would be implemented to the extent required to avoid AEoI and the Planning Inspectorate advises that the use of caveats should be revisited in this regard.	and avoids the use of "as far as reasonably practicable" for mitigation measures that support it.
114	22 October 2025 Draft documents review	Draft HRA Report (15) Paras 4.1.13, 4.1.22, 5.3.90 to 5.3.101, 5.3.167 to 5.3.175 and Table 5-1	The HRA and MCZ Report includes a placeholder pending confirmation of a mitigation strategy to address loss of functionally linked land (FLL) (to the Chichester and Langstone Harbour SPA and Ramsar site) at SWBGS sites where the WRP would be located. A high-level summary of the proposal for delivery and maintenance of suitable habitat at a site on the edge of Chichester Harbour is set out. It is stated that NE is actively involved.	The Applicant can confirm that all of the individual SWBGS sites at risk of effects from the Project are clearly set out in the HRA - Stage 2 AA and MCZ - Stage 1 Assessment (Document reference 5.2, DCO Volume 5). In addition, the mitigation strategy approach has been shared with NE who have agreed with its suitability. This agreement is reflected in the NE Statement of Common Ground (Document reference 5.8, DCO Volume 5) and the mitigation approach is included in the HRA - Stage 2 AA and

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
			<p>The Planning Inspectorate advises that the DCO application version of the HRA and MCZ Report should more clearly set out, preferably using tables, the location and area of FLL at the SWBGS that would be temporarily and permanently affected by the proposed development, and the mitigation proposed. Clarification is needed, as in some instances the draft report suggests that W03G would be subject to permanent habitat loss but it appears that the reference should be to H08, and that W03G is FLL for Portsmouth Harbour SPA subject to temporary loss of feeding and roosting habitat address from paragraph 5.3.302 onwards of the report. The Planning Inspectorate refers the applicant to the Planning Inspectorate's advice page Nationally Significant Infrastructure Projects: Advice on Habitats Regulations Assessments, which sets out the information required in respect of mitigation. The DCO application version of the HRA Report must include this level of detail.</p>	<p>MCZ - Stage 1 Assessment (Document reference 5.2, DCO Volume 5) submitted with the DCO application. This includes a table as suggested. Text has been reviewed and amended to ensure sites are referred to correctly throughout.</p>

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
115	22 October 2025 Draft documents review	Draft HRA Report (16) Paras 4.1.28 to 4.1.31, and 4.1.35	It is proposed that a fluid breakout management plan, water monitoring plan and temporary construction drainage strategy would be produced to manage risks from construction of tunnel shafts and trenchless installation activities resulting in hydrological change and waterborne pollution from runoff. The Planning Inspectorate would expect outline versions of these plans to be submitted with the DCO application.	While outline versions of the plans are not provided in the application, the relevant measures and principles have been included in the Outline Construction Environmental Management Plan (CEMP) (Document reference 7.1, DCO Volume 7). The detailed Drilling Fluid Management Plan, Foundation Works Risk Assessment, Fluid Breakout Management Plan, Water Monitoring Plan and Temporary Construction Drainage Plan will be prepared in line with the Outline CEMP (Document reference 7.1, DCO Volume 7).
116	22 October 2025 Draft documents review	Draft HRA Report (17) Para 4.1.32	The HRA and MCZ Report should more clearly describe the proposed phosphorus reduction measures at the WRP. This could be by cross-reference to the ES Project Description Chapter. The Planning Inspectorate has provided comments on this at ref no. 18 in that table.	The Applicant can confirm that cross references to the relevant sections of ES Chapter 3 Description of Proposed Development, Volume I (Document reference 6.1, DCO Volume 6), which include the description of phosphorus reduction measures, have now been added to the HRA - Stage 2 AA and MCZ - Stage 1 Assessment (Document reference 5.2, DCO Volume 5) submitted with the DCO application.

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
117	22 October 2025 Draft documents review	Draft HRA Report (18) Para 5.1.3	The HRA and MCZ Report states that conservation objectives are provided within the HRA stage 1 screening report, which has not been provided at the draft document review stage. The Planning Inspectorate refers the applicant to Nationally Significant Infrastructure Projects: Advice on Habitats Regulations Assessments, which requires a copy of the citation and Natura 2000 data sheet for each European site to be provided as part of the HRA.	Copies of the citations and Natura 2000 data sheets have been included in a separate appendix within the HRA - Stage 2 AA and MCZ - Stage 1 Assessment (Document reference 5.2, DCO Volume 5) submitted with the DCO application.
118	22 October 2025 Draft documents review	Draft HRA Report (19) Para 5.3.28 and 5.3.11	A placeholder is included stating that a seasonal restriction on trenchless installation works to avoid key spawning and migration periods of qualifying fish species of the River Itchen SAC and River Meon Compensatory SAC may be required pending the final assessment. This should be clarified, and if required the seasonal restriction should be demonstrably secured in the dDCO or other legal mechanism.	All placeholders in the HRA - Stage 2 AA and MCZ - Stage 1 Assessment (Document reference 5.2, DCO Volume 5) have been finalised for the DCO submission. Any mitigation relied upon has been secured in the dDCO (Document reference 3.1, DCO Volume 3). Restrictions on trenchless crossings under the River Itchen SAC and River Meon Compensatory SAC are not anticipated to be required. The assessment of potential effects from underwater noise and vibration on fish and fish eggs has used the published accepted guidance for thresholds of

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				<p>harm in marine and freshwater environments.</p> <p>Measured vibration from tunnelling using larger machinery (and therefore likely greater vibration than proposed for this project) was 1.4 mm/s, which is ten times lower than published mortality thresholds. Underwater noise and vibration from the proposed microtunnelling method is therefore below harm thresholds. The assessment concluded that no significant effects are anticipated and that no mitigation or monitoring is required.</p>
119	22 October 2025 Draft documents review	Draft HRA Report (20) Para 5.3.29	The conclusion regarding AEoI on the River Itchen SAC in relation to the otter qualifying feature could be more clearly presented. It reads as though the conclusion of no AEoI is dependent upon securing a separate licence from NE that details mitigation. However, the Planning Inspectorate understands that the conclusion would be no AEoI based on surveys to date not identifying potential holt sites within 200m of the works, and preconstruction surveys would be	The paragraph on potential adverse effects on otter has been reworded for clarity.

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
			undertaken to demonstrate no change in the baseline.	
120	22 October 2025 Draft documents review	Draft HRA Report (21) Paras 5.3.80 to 5.3.81	This may be further described or cross-referenced in the HRA stage 1 assessment, but the Planning Inspectorate advises that the dispersion modelling undertaken to support the conclusion of no AEoI to the Atlantic salmon qualifying feature of the River Itchen SAC from hydrological change or waterborne pollution during operation should be included within the dDCO application. This should include the method used and the outcomes relative to the specified parameters.	Dispersion modelling has been included with the DCO application. The method used, full model results and outcomes relative to the specified parameters are located in ES Appendix 19.5 Eastney Long Sea Outfall dispersion modelling, Volume II, and ES Appendix 19.6 Havant Thicket Reservoir compensatory flows water quality modelling, Volume II (Document reference 6.2, DCO Volume 6), as referenced in the HRA - Stage 2 AA and MCZ - Stage 1 Assessment (Document reference 5.2, DCO Volume 5).
121	22 October 2025 Draft documents review	Draft HRA Report (22) Paras 5.3.108 to 5.3.109	The phrase “any potential impact on the Langstone Harbour would be muted by its connectivity with the sea” is used several times in the assessment of potential AEoI of Chichester and Langstone Harbours SPA from hydrological change. The Planning Inspectorate considers that this phrase lacks specificity in terms of explaining why impacts would be reduced; it advises	The Applicant can confirm that justification for the phrase “any potential impact on the Langstone Harbour would be muted by its connectivity with the sea” is now included in the HRA - Stage 2 AA and MCZ - Stage 1 Assessment (Document reference 5.2, DCO Volume 5) submitted with the DCO application. Specifically, the HRA - Stage 2 AA and MCZ - Stage 1 Assessment (Document reference 5.2, DCO Volume 5) now sets

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			a clearer evidence-based explanation should be provided.	out how potential inputs to the harbour are extremely small relative to the total volume of water that enters and leaves the harbour between mean high water and mean low water during a typical tidal cycle (approximately 0.05%).
122	22 October 2025 Draft documents review	Draft HRA Report (23) Paras 5.3.305 and 5.3.324	A conclusion of no AEoI of Portsmouth Harbour SPA and Ramsar site is reached in respect of potential habitat loss and fragmentation arising from construction of the pipeline based on effects being short term and reversible, but the duration of impacts and habitat restoration timescale is not stated. This should be clarified.	Additional detail has been added on impacts on Portsmouth Harbour SPA/Ramsar, including duration of works and habitat restoration timescales for the FLL of Portsmouth Harbour sites.
123	22 October 2025 Draft documents review	Draft HRA Report (24) Section 6	The MCZ stage 1 assessment for Bembridge MCZ has been included as section of the HRA and MCZ Report. The Planning Inspectorate is not aware of any reasons why the HRA and MCZ assessments should not be presented in one report but advises that as they are separate assessment processes subject to different legal tests the relevant information for the MCZ must be clearly set out to facilitate the competent authority's decision-making.	The distinction between the HRA Stage 2 AA and the MCZ Stage 1 Assessment for Bembridge MCZ has been made clearer in order to facilitate the competent authority's decision making.

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
124	22 October 2025 Draft documents review	Draft HRA Report (25) Formatting	The paragraph numbering of section 5.3 restarts after paragraph 5.3.402. This should be corrected.	The identified formatting issue has been corrected for the DCO submission.
125	22 October 2025 Draft documents review	Draft HRA Report (26) Section 8	Section 8 References has not been populated. This should be corrected.	References have been added and the formatting issue has been corrected for the DCO submission.
126	22 October 2025 Draft documents review	Draft ES Project Description Chapter (1) General	The chapter contains repetition in several places, which the Planning Inspectorate acknowledges is partly due to the linear nature of the pipeline component, and the applicant's approach to subdivide the works into pipeline sections. The outputs of the proposed WRP in different conditions are also described in multiple locations, and in some instances, there are discrepancies between the figures used for the minimum transfer outside of drought conditions (for example, paragraph 3.3.32 refers to 20 megalitres per day (MI/d) but paragraph 3.6.4 states 20MI/d to 30MI/d). To aid understanding, it would be beneficial to avoid repetition	ES Chapter 3 Description of the Proposed Development, Volume I (Document reference 6.1, DCO Volume 6) has been updated to address the Planning Inspectorate's advice. References to operational flows have been reviewed across the chapter and made consistent, including reconciliation of previously conflicting figures. To aid clarity and avoid repetition, the maximum operational outputs for all relevant components have been consolidated into one table (Table 3.22) in section 3.6, together with an explanation of the minimum outputs of the WRP.

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
			through consolidation of the text and to clarify the minimum and maximum outputs for example in a single table.	
127	22 October 2025 Draft documents review	Draft ES Project Description Chapter (2) General	Figures used in the ES Project Description Chapter should be legible and not blurred to aid the reader. For example, annotations on Graphic 3-10 are not fully legible when zoomed in. Automatically generated alt text descriptions have been added to images, which are not always accurate. For example, the alt text on Graphic 3-10 states it is a blueprint of a house. Care should be taken to ensure alt text is accurate.	The Planning Inspectorate's advice is noted and has been taken into account. This figure has been updated in ES Chapter 3 Description of the Proposed Development, Volume I (Document reference 6.1, DCO Volume 6). The Applicant has checked all other figures across the application to ensure their legibility. The Applicant has reviewed alt text captions across all application documents and has included accurate alt text where practicable.
128	22 October 2025 Draft documents review	Draft ES Project Description Chapter (3) General	In several places, the ES Project Description Chapter indicates that flexibility would be retained for a component until detailed design stage, for example the connection point for pipeline between the WRP and Budds Farm WTW, the pipeline crossing at River Meon and Wickham Park Golf Club and the access road from Chalk Lane to Intermediate Pumping Station F (IPS-F). The ES should justify the need for	Where flexibility has been retained, the ES assesses the maximum envelope (worst case scenario) in accordance with the Rochdale Envelope approach (Planning Inspectorate (2018) Advice Note Nine: Rochdale Envelope, (Version 3)). The chapter (ES Chapter 3 Description of the Proposed Development, Volume I (Document reference 6.1, DCO Volume 6)) now

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			remaining flexibility and assess the worst case parameters of the remaining options.	clearly sets out why flexibility is sought, including: <ul style="list-style-type: none"> • Budds Farm WTW to WRP pipeline (paragraph 3.3.18): Flexibility in the final location of the Pipelines within the Order Limits has been retained, as the exact connection points at the WRP site and Budds Farm WTW will be determined at detailed design stage following DCO approval. • River Meon crossing and Wickham Park Golf Club (paragraph 3.3.46): Optionality within the Order Limits has been retained to allow consideration of the Pipeline location at detailed design stage, reducing effects on the operations of Wickham Park Golf Club during construction. • Access to IPS-F (paragraph 3.3.78): Flexibility within the Order Limits has been retained for the final location of the permanent access road from Chalk Lane, due to uncertainties associated with

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				the Welborne Garden Village development.
129	22 October 2025 Draft documents review	Draft ES Project Description Chapter (4) General	In several places, the ES Project Description Chapter presents worst case parameters used in the assessment work but describes these as “likely worst case”. The actual worst case parameters must be specified and used as the basis for assessment. Any assumptions made in establishing these should be explained.	<p>The ES defines the maximum parameters for Project components, and the assessment has been undertaken on this basis.</p> <p>The phrase ‘likely worst case parameters’ is no longer used in the EIA documents. Instead, in accordance with the Rochdale Envelope approach, EIA topic assessments have been based on maximum parameters to accommodate design refinement and uncertainty, ensuring that a worst case scenario has been assessed and therefore likely worst case effects have been reported. As set out in ES Chapter 5 EIA Approach and methodology, Volume I (Document reference 6.1, DCO Volume 6), the EIA methodology explains how these parameters have been established and aligns with best practice and guidance.</p> <p>Where assumptions have been required in defining the worst case parameters, these are explicitly identified and justified within the Assumptions and Limitations sections of the relevant topic chapters,</p>

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				as described in section 3.1 of ES Chapter 3 Description of the Proposed Development, Volume I (Document reference 6.1, DCO Volume 6).
130	22 October 2025 Draft documents review	Draft ES Project Description Chapter (5) General	The description of the nature and quantity of natural resources proposed to be used, and the estimate of expected residues and emissions in the ES Project Description Chapter lacks sufficient detail in several areas including water supply, requirements for energy and chemicals, and the composition of reject water. The Planning Inspectorate reiterates the comments provided at ID 2.1.16 and 2.1.17 of the Scoping Opinion and advises that full descriptions must be provided in the ES. If this is not in the project description, it should be detailed in the relevant aspect chapter with suitable cross-referencing.	Further information on natural resource use and emissions has been included in relevant topic chapters and supporting assessments. A Minerals Safeguarding Areas assessment has been completed to support ES Chapter 16 Resources and waste management, Volume I (Document reference 6.1, DCO Volume 6). It is not considered proportionate to provide cross-references to all topic chapter assumptions in ES Chapter 3 Description of the Proposed Development, Volume I (Document reference 6.1, DCO Volume 6).
131	22 October 2025 Draft documents review	Draft ES Project Description Chapter (6) General	Various infrastructure components such as the construction compounds and IPS are named in the text by reference to the pipeline section (D to M). It would be helpful to readers if the same referencing system could be applied across the DCO application documents.	The naming system has been applied consistently across all application documents, alongside reference to work numbers where relevant. A separate document explaining the naming of Project components and refinements since consultation has been provided.

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132	22 October 2025 Draft documents review	Draft ES Project Description Chapter (7) Paras 3.1.16 to 3.1.17	The parameters and vertical LoD upon which the ES is based must be consistent with what is secured in the Design Principles and Schedule 2 of the dDCO.	The parameters set out in the chapter are the same as set out in the Design Principles Document. Compliance with the Design Principles Document is secured by a relevant requirement in Schedule 2 of the dDCO.
133	22 October 2025 Draft documents review	Draft ES Project Description Chapter (8) Para 3.2.4	It states that no demolition is proposed as part of the proposed development. The Planning Inspectorate notes, however, that the dDCO gives powers for demolition in several places (items (b)(i) and (viii) of the Ancillary Works in Schedule 1). This should be clarified. If demolition is proposed, the ES Project Description Chapter should describe the maximum parameters associated with this activity. An assessment of any likely significant effects should be provided in the ES. If no demolition is proposed, the dDCO should be amended accordingly.	ES Chapter 3 Description of the Proposed Development, Volume I (Document reference 6.1, DCO Volume 6) now includes a description of the demolition, disassembly and/or temporary relocation of a number of small structures that may be required. The associated environmental effects are assessed in the relevant chapters of the ES (ES Chapter 6 Air quality and odour, ES Chapter 8 Terrestrial and freshwater biodiversity, ES Chapter 10 Carbon and climate change, ES Chapter 12 Land use and agriculture, ES Chapter 15 Noise and vibration, ES Chapter 16 Resources and waste management and ES Chapter 18 Socio-economics, tourism and health, Volume I (Document reference 6.1, DCO Volume 6)).

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
134	22 October 2025 Draft documents review	Draft ES Project Description Chapter (9) Para 3.3.14	Surface water at the WRP is proposed to be attenuated and treated through SuDS. It is not specified if an outline drainage strategy would form part of the dDCO application although reference is made to outfall being designed in accordance with the Design Principles Document. The applicant should consider providing an outline drainage strategy, which clearly sets out the proposals for surface water during operation of the proposed development.	An outline operational drainage strategy for the WRP site is presented in ES Appendix 19.1 Flood Risk Assessment, Volume II (Document reference 6.1, DCO Volume 6).
135	22 October 2025 Draft documents review	Draft ES Project Description Chapter (10) Para 3.3.31	The ES Project Description Chapter should clearly describe the environmental mitigation and enhancement proposed as part of Portsmouth Water's project based on the latest information in the public domain. It would be beneficial for an overlay plan showing the interaction of the proposed development with the Portsmouth Water project works to be submitted to aid understanding.	An overlay plan has not been included in ES Chapter 3 Description of the Proposed Development, Volume I (Document reference 6.1, DCO Volume 6). Section 3.3 (Principal Components) of ES Chapter 3 Description of the Proposed Development, Volume I (Document reference 6.1, DCO Volume 6) confirms that the ES future baseline incorporates Portsmouth Water's environmental mitigation and enhancement measures at Bedhampton Springs. ES Chapter 5 EIA approach, Volume I (Document reference 6.1, DCO Volume

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				6) sets out how the assessment in the ES considers Portsmouth Water-installed mitigation planting, explaining that all planting would be removed and then reinstated.
136	22 October 2025 Draft documents review	Draft ES Project Description Chapter (11) Para 3.3.34	The Planning Inspectorate understands that due to the linear nature of the pipeline component of the proposed development, the Applicant has decided to subdivide the description of works into sections D to M. The ES should explain how the dividing locations were determined; it should be clear that this has not been done in a way that could result in underreporting of assessment outcomes. It would be helpful to also label sections A to C in the chapters and on the plans to avoid confusion.	Additional information has been added explaining how each section of the Pipeline between the WRP and Otterbourne WSW has been divided. Section C of the Pipeline has not been included as this comprises the Pipelines between Budds Farm WTW and the WRP. This section is not labelled as Section C as it is separate to the transfer from the WRP site to Otterbourne WSW, and having two names could result in confusion between different pipelines that are transferring different types of water. There could also be confusion in using the same labelling as this component comprises two pipelines that transfer treated wastewater and reject water in opposite directions, whereas the transfer from the WRP site to Otterbourne WSW comprises one pipeline transferring source water.

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				Sections A and B of the Pipeline have also not been included as these were previously sections of a direct transfer between the WRP and Havant Thicket Reservoir, which was not progressed following the approval of Portsmouth Water's pipelines. As above, the type of water being transferred in this pipeline is different, and two pipelines will transfer recycled water and source water in opposite directions within this component.
137	22 October 2025 Draft documents review	Draft ES Project Description Chapter (12) Para 3.3.61	Proposed upgrade works to Otterbourne WSW should be considered in the cumulative effects assessment where there is potential for significant cumulative effects during construction or operation of the proposed development. The ES should clarify if the proposed development is reliant upon the upgrade works being complete prior to it being commissioned, and any implications for the assessment if the programme is delayed.	ES Chapter 20 Cumulative and in-combination effects, Volume I (Document reference 6.1, DCO Volume 6) assesses cumulative effects of the Project and the Otterbourne WSW upgrade works. The relationship between the Project and the Otterbourne WSW upgrades has been clarified in the ES Appendix 20.2 Cumulative effects assessment, Volume III (Document reference 6.3, DCO Volume 6). The Project is reliant on the Otterbourne WSW upgrade works being complete prior to commissioning. ES Appendix 20.2 Cumulative effects assessment, Volume III (Document reference 6.3,

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				DCO Volume 6) provides a worst case assessment with regard to the overlapping construction programmes.
138	22 October 2025 Draft documents review	Draft ES Project Description Chapter (13) Para 3.3.105 to 3.3.106	Reference is made to various utility connections being delivered through permitted development rights. These proposals should be assessed within the cumulative effects assessment where there is potential for likely significant cumulative effects.	ES Chapter 20 Cumulative and in-combination effects, Volume I (Document reference 6.1, DCO Volume 6) assesses the cumulative effects of the Project and the proposed utility connections.
139	22 October 2025 Draft documents review	Draft ES Project Description Chapter (14) Para 3.5.3	The applicant should ensure the core working hours for construction and the operations that may take place outside of the core working hours (as described in the ES Project Description Chapter) are consistent with what is specified in the dDCO and appropriately secured.	Working hours detailed in ES Chapter 3 Description of the Proposed Development, Volume I (Document reference 6.1, DCO Volume 6) are secured in the Outline CEMP (Document reference 7.1, DCO Volume 7).
140	22 October 2025 Draft documents review	Draft ES Project Description Chapter (15) Para 3.5.12	A temporary cofferdam may be required to construct the SuDS outfall in the Hermitage Stream. Relevant parameters for any cofferdams, including maximum number, dimensions and duration of use, should be described in the ES.	The ES Chapter 3 (Description of the Proposed Development, Volume I (Document reference 6.1, DCO Volume 6) provides further parameters and assumptions for the temporary cofferdam to construct the SuDS outfall in the Hermitage Stream. This confirms the number, dimensions and duration of use.

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
141	22 October 2025 Draft documents review	Draft ES Project Description Chapter (16) Para 3.5.69	The Planning Inspectorate would recommend submitting outline versions of the site waste management plan and materials management plan as part of the ES or outline construction environmental management plan.	While outline versions of the plans are not included in the application, the relevant measures and principles have been incorporated into the Outline CEMP (Document reference 7.1, DCO Volume 7). A Site Waste Management Plan and Materials Management Plan will be secured by the relevant (CEMP) requirement in Schedule 2 to the dDCO (Document reference 3.1, DCO Volume 3).
142	22 October 2025 Draft documents review	Draft ES Project Description Chapter (17) Paras 3.5.115 and 3.5.126	The ES should describe how any solid waste from the slurry tunnel boring machine would be disposed of, if this method is used.	This has been included in ES Chapter 3 Description of the Proposed Development, Volume I (Document reference 6.1, DCO Volume 6).
143	22 October 2025 Draft documents review	Draft ES Project Description Chapter (18) Para 3.6.10	The ES should describe any relevant guidance relating to the determination of phosphorus levels in the recycled water, and confirm the status of the associated environmental permit application with the EA. The Planning Inspectorate had understood from recent project update meetings that there was a potential for	Phosphorus mitigation has been incorporated into the design of the WRP. An Environmental Quality Standard (EQS) for phosphorus under the Water Framework Directive Directions 2015 has been used to determine appropriate phosphorus levels in the recycled water.

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
			phosphorus treatment measures, for which the physical components would be included in the DCO application. It is unclear from the ES Project Description Chapter if this is still the case and this should be clarified in the DCO application version.	Pre-application engagement with the EA has commenced regarding the Environmental Permit which is required for the transfer of recycled water into Havant Thicket Reservoir. Draft Position Statements have been submitted to the EA, containing interim information to support the permit application.
144	22 October 2025 Draft documents review	Draft ES Project Description Chapter (19) Para 3.6.22	It would be helpful to aid understanding if the ES included a figure to show the locations where the proposed 6m protective strip would be required in relation to pipeline installed by open-cut method, and where this would not be required due to use of trenchless methods.	The ES does not include a figure because the Project is not committing to a fixed 6m protective strip. The eventual working width will depend on pipeline depth, installation method, and local ground conditions, and may therefore vary along the route. This width will be confirmed directly with landowners once detailed design is available. Information on pipeline protection measures, including where trenchless installation removes the need for a protective strip, is set out in the Statement of Reasons (Document reference 4.1, DCO Volume 4).
145	22 October 2025	Draft ES Project	Reject water from the WRP is proposed to be disposed of via the existing Eastney Long Sea Outfall (LSO). The ES should explain the nature of any operational	ES Chapter 3 Description of the Proposed Development, Volume I (Document reference 6.1, DCO Volume 6) explains that the Project would utilise

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
	Draft documents review	Description Chapter (20) Paras 3.6.39 to 3.6.41	powers sought in respect of the Eastney LSO. Any impact pathways arising from the exercise of such powers should be assessed in the ES where significant effects are likely to occur. The Planning Inspectorate had understood from recent project update meetings that there was a potential change to the proposed development as described in the applicant's scoping report, wherein some physical works might be required to the Eastney LSO. It is unclear from the ES Project Description Chapter if this is still the case and this should be clarified in the DCO application version.	the existing Eastney LSO, operated by the Applicant, for the release of reject water via Budds Farm WTW. No operational powers over the Eastney LSO are sought, and no physical works to the LSO itself form part of the Project. The ES assesses the potential environmental effects associated with the release of reject water via this existing infrastructure. The Applicant requires an environmental permit for the discharge of reject water via the Eastney LSO, as set out in the Other Consents and Licences Position Statement (Document reference 5.4, DCO Volume 5).
146	22 October 2025 Draft documents review	Draft ES Project Description Chapter (21) Paras 3.7.4 to 3.7.7	It is stated that consent would not be sought for decommissioning in the DCO as the operational life of the proposed development could extend beyond the assumed 100-year design life with further maintenance and repair. It is unclear from the ES Project Description Chapter if the ES would include an assessment of decommissioning; paragraph 3.7.7 states that the approach to assessment is set out in ES Chapter 5 EIA Approach and	ES Chapter 5 EIA approach and methodology, Volume I (Document reference 6.1, DCO Volume 6) sets out the approach to assessing the decommissioning phase. While consent for decommissioning works is not sought, reasonably foreseeable effects have been assessed across ES Chapters 6–19 (Document reference 6.1, DCO volume 6) in accordance with the EIA Scoping Opinion (ES Appendix 5.2

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
			<p>Methodology, which does not form part of the draft document review.</p> <p>The Planning Inspectorate reiterates the comments provided at ID 2.2.1 of the adopted Scoping Opinion, which required an assessment of impacts resulting from decommissioning in each aspect chapter that is proportionate, and includes a description of the process and methods of decommissioning, land use requirements and estimated timescales. Regulation 14(3) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 states that the ES must be based on the most recent scoping opinion adopted so far as the proposed development remains materially the same as the proposed development which was subject to that opinion.</p>	<p>EIA Scoping Opinion, Volume II (Document reference 6.2, DCO Volume 6)). The assessment of decommissioning in topic chapters is based on the description of decommissioning contained in section 3.7 of ES Chapter 3 Description of the Proposed Development, Volume I (Document reference 6.1, DCO Volume 6).</p>
147	22 October 2025 Draft documents review	Draft planning statement	The Applicant is advised to include the reference for where the Environment Agency's quote is taken from; can the quote be read in context elsewhere in the application?	Para 3.2.1 of the draft planning statement stated, "The Project is recognised as a project of national significance in an area identified by the EA as being 'seriously water stressed'". The term 'seriously water stressed' is not a quote from the EA, rather it reflects

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				their determination of areas of water stress undertaken in 2021 and accepted by the Secretary of State. 'Serious water stress' is defined in the Water Industry (Prescribed Conditions) Regulations 1999. The Planning Policy Statement was subsequently updated to make this clear.
148	22 October 2025 Draft documents review	Draft book of reference	Appears to be incomplete as it is only 18 pages and could not be cross checked with the dDCO as the plot numbers could not be found.	The draft Book of Reference and draft Land plans submitted were sample documents to request general feedback on the Applicant's template documents. A small sample size was included for review so that the formatting, presentation and standard requirements could be reviewed in line with what the Planning Inspectorate would accept for final submission. These did not include all the dDCO plots as these were still being drafted and were under review.
149	22 October 2025 Email	Pre-application prospectus update	The Planning Inspectorate advised of updates to the Pre-Application Prospectus - in particular: <ul style="list-style-type: none"> the establishment of land and rights negotiations tracking as a primary service feature – this 	The Applicant notes the Planning Inspectorate (2024) Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus ('Pre-application Prospectus 2024') and has considered this in the preparation of the DCO documents and in its subsequent

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
			<p>means it is now expected for all applicants to develop and share a land and right negotiations tracker in 1 of 2 available templates, irrespective of the service tier they have subscribed to</p> <ul style="list-style-type: none"> clarified expectations of Applicants when preparing to interact with the Planning Inspectorate at meetings – including clarified rights for the Planning Inspectorate to delay or refuse service where pre-meeting expectations are not upheld e.g. an updated programme document or issues tracker is not provided, on time, to inform a meeting agenda <p>The Applicant will be used to supplying the Planning Inspectorate's case team with certain documents ahead of project update meetings. The suite of documents has expanded, so in future, 10 working days ahead of any project update meeting, please provide the following:</p> <ul style="list-style-type: none"> up-to-date Programme Document up-to-date Issues Tracker 	<p>interactions with the Planning Inspectorate during the pre-application process, including in relation to:</p> <ul style="list-style-type: none"> Discussions over the development of a Pre-application Land and Rights Negotiation Tracker Ensuring agendas and materials for Project Update Meetings with the Planning Inspectorate are prepared in accordance with expected timescales and requirements, and Issuing an updated Programme Document as and when project changes required this.

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
			<ul style="list-style-type: none"> • up-to-date Land and Rights Negotiation Tracker • draft agenda • any material to support the agenda, such as a presentation slide pack <p>Templates for these documents can be found in the published Prospectus; please use them if these documents are yet to be created.</p>	
150	7 November 2025 Project Update Meeting	Draft document review/pre-application submission - Draft Development Consent Order (dDCO)	<p>The Planning Inspectorate advised the applicant to make clear in the dDCO that it does not intend to compulsorily acquire dwellings.</p> <p>It is also important that the considerations of upgrade or refurbishment have been correctly signposted in the dDCO and other documents. Empty schedules regarding land plots in the dDCO need to be completed.</p>	The Applicant confirms that the Schedules regarding land plots in the dDCO (Document reference 3.1, DCO Volume 3) have been completed for submission. The Statement of Reasons (Document reference 4.1, DCO Volume 4) considers in more detail the interaction of the compulsory acquisition powers sought and private dwellings.
151	7 November 2025 Project Update Meeting	Draft document review/pre-application submission - Draft	The Planning Inspectorate outlined the need to signpost to relevant parts of the ES to aid the necessary acceptance checks when the application is submitted.	The Applicant has included clear signposting and cross referencing to the relevant parts of the ES within the Explanatory Memorandum (Document

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
		Explanatory Memorandum		reference 3.2, DCO Volume 3) where these are relevant.
152	7 November 2025 Project Update Meeting	Draft document review/pre-application submission - Draft Works Plans (sample) and Draft Land plan (sample)	<p>The Planning Inspectorate outlined the need for the Book of Reference and dDCO to be complete – even if not in their final form – to allow checks against the relevant regulations to be carried out. Skeleton documents can lack the necessary information to cross check plans with other related documents, thereby reducing the Planning Inspectorate's ability to provide valuable feedback.</p> <p>Plans should be consistent across the application e.g. sheet 2 of the Land Plans should cover the same area as sheet 2 of the Work Plans.</p>	The Applicant discussed the template for the Book of Reference (Document reference 4.3, DCO Volume 4) and the consistency of plans with the Planning Inspectorate at a meeting on the 7 November 2025 as part of the document review/ pre-application submission process. The Applicant confirms it has considered the advice provided in the preparation of the dDCO (Document reference 3.1, DCO Volume 3) and that plans are consistent across the DCO application.
153	7 November 2025 Project Update Meeting	Draft document review/pre-application submission - Draft HRA Report	Regarding HRA Ref. 16, the Applicant stated that it would not be submitting outline management plans. The Planning Inspectorate advised it would need to be clear that proposed measures were feasible and that if the application were accepted for examination, this matter might be an area of questioning by the ExA.	The HRA - Stage 2 AA and MCZ - Stage 1 Assessment (Document reference 5.2, DCO Volume 5) has been updated to reflect the outline management plans that will be submitted with the DCO application. The HRA Stage 2 AA and MCZ Stage 1 Assessment refers to the Outline CEMP (Document reference 7.1, DCO Volume 7), which contains measures required for a Construction

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				Drainage Plan (WE4 and WE5), Outline Foundation Works Risk Assessment (FWRA) (Document reference 7.4, DCO Volume 7), Outline LEMP (Document reference 7.2, DCO Volume 7), Water Monitoring Plan ES Appendix 19.9 Outline Water Monitoring Plan, Volume II (Document reference 6.2, DCO Volume 6) and Invasive Non-Native Species Biosecurity Plan (Document reference 7.10, DCO Volume 7).
154	7 November 2025 Project Update Meeting	Draft document review/pre-application submission - Draft ES Chapter 3 (Description of Proposed Development)	Regarding ES Ref. 3, the Applicant confirmed that it could include more detail about why extra flexibility is sought for the identified components. The Planning Inspectorate outlined that extra cross referencing would be helpful.	ES Chapter 3 Description of the Proposed Development, Volume I (Document reference 6.1, DCO Volume 6) provides an explanation of why flexibility is required for certain components. In most cases, this flexibility is needed to reduce impacts on landowners and businesses during later design and construction stages, allowing working areas and construction methods to be refined once detailed constraints are known. Following the Planning Inspectorate's review of ES Chapter 3, no additional cross referencing was considered

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				necessary as justification for flexibility is included in the chapter. The Scheme Development Report (Document reference 5.10, DCO Volume 5) also sets out how the design has evolved and explains why retaining defined but adaptable parameters supports better environmental and land-use outcomes.
155	7 November 2025 Project Update Meeting	Draft document review/pre-application submission - Draft Book of Reference (sample)	The Book of Reference should begin with a section on how to read the document on its own and in conjunction with other application documents, such as the dDCO.	The Book of Reference (Document reference 4.3, DCO Volume 4) describes the land subject to compulsory acquisition and temporary possession powers to provide details of persons with an interest in the Order Land. The purpose of the Book of Reference (Document reference 4.3, DCO Volume 4) and a description of other application documents that should be read alongside it, including the Statement of Reasons (Document reference 4.1 DCO Volume 4), are provided at the start of the document.
156	7 November 2025	Draft document review/pre-application	Recently, the Planning Inspectorate updated their pre-application prospectus	The Applicant discussed the template for the Pre-application Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4) with the

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
	Project Update Meeting	submission - Draft Pre-application Land and Rights Negotiation Tracker	with two Land and Rights Negotiation Tracker. The tracker does not have to be complete at Acceptance but a detailed version is useful, and could be requested by the Examining Authority (ExA), at Examination.	Planning Inspectorate as part of the document review/ pre-application submission and has considered the advice provided in the preparation of the document. A template of the proposed form of tracker was provided to the Planning Inspectorate prior to a Project Update Meeting on 11 March 2026. During the meeting, the Planning Inspectorate provided further comments which are summarised in row reference 161.
157	7 November 2025 Project Update Meeting	Draft document review/pre-application submission - Key Issues	It would be useful to quantify definitions of the emergency risks. Framework needed to mitigate any potential emergency failures. Documents mentioned on slide 28 need to be named in a more concise manner.	It is understood that the first part of this advice concerns the assessment in the HRA of operational emergency scenarios which could result in the spread of INNS and waterborne pollution. Please see row reference 111, which sets out that the Applicant has agreed with NE that further assessment of operational emergency scenarios in the HRA is not required. It is understood that the second part of this advice concerns text in the draft planning statement which was reviewed by the Planning Inspectorate in October 2025. This read "the Project is

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				recognised as a project of national significance in an area identified by the EA as being 'seriously water stressed'. In response to this advice the Planning Policy Statement was updated to refer to the EA's policy paper titled 'Water stressed areas – 2021 classification'.
158	7 November 2025 Project Update Meeting	Draft document review/pre-application submission - Post-Meeting Note	The Planning Inspectorate advised that the Applicant could consider two approaches to this matter in the HRA. It could demonstrate in the HRA report that NE agreed that further assessment of the operational emergency scenarios is not required, or it could identify mitigation proposed to address risks associated with the scenarios and/ or remediation as part of an assessment at stage 2.	<p>This advice relates to a comment from the Planning Inspectorate's draft document review, which concerned the assessment of operational emergency scenarios in the HRA and MCZ (see reference 111 for the Planning Inspectorate's full comment). The comment explained that if the possibility of the emergency scenarios cannot be excluded, the HRA must consider the relevant impact pathways. In this meeting, the Applicant sought clarification on this comment.</p> <p>The Applicant can confirm that its approach on operational emergency scenarios relating to the use of wash-out valves has been discussed in detail with NE. NE has agreed that the further assessment of the operational emergency scenarios is not required.</p>

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				This is confirmed in the Draft Statement of Common Ground – NE (Document reference 5.8, DCO Volume 5) and within the HRA - Stage 2 AA and MCZ - Stage 1 Assessment (Document reference 5.2, DCO Volume 5).
159	20 November 2025 Email	Adequacy of Consultation Milestone (AoCM) statement feedback	<p>Having reviewed the AoCM, the Planning Inspectorate considers that the Applicant has set out its approach to consultation clearly, summarising its activities to date including the SoCC.</p> <p>The Applicant is advised to include evidence with its application that Section 44 category persons were consulted, along with copies of notices/letters sent to Section 42 consultees.</p> <p>Paragraph 6.1.6 mentions two councils not being able to confirm the applicant had consulted under Section 48 and the applicant details how this was resolved. The applicant is advised to include evidence of this resolution in its application.</p>	<p>The Applicant prepared Appendix A.3 (ACoM) which detailed how consultation had been carried out in accordance with the components set out in the Programme Document within section 1.4 and the 2024 SoCC within section 4.2.</p> <p>The Applicant confirms that all categories of persons falling within the meaning of Section 44 have been consulted. How consultation was carried out with those identified under Section 44 is set out in:</p> <ul style="list-style-type: none"> • Section 9.3 for Summer 2024 Consultation • Section 10.3 for Spring 2025 Consultation • Section 11.3 for Autumn 2025 Consultation • Section 12.3 for Spring 2026 Consultations

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				<p>Copies of notices and letters sent to Section 42 consultees can be found in:</p> <ul style="list-style-type: none"> • Appendix F (Statutory Summer 2024 Consultation) • Appendix G (Statutory Spring 2025 Consultation) • Appendix H (Statutory Autumn 2025 Targeted Consultation) • Appendix I (Statutory Spring 2026 Consultations) <p>To resolve PCC and HBC's comments on compliance with Section 48, the Applicant provided copies of the published notices with all local authorities. This is explained in paragraph 6.1.6 of Appendix A.3 (AoCM).</p>
160	11 March 2026 Project Update Meeting	Project progress and consultation update – Draft Potential Main Issues for Examination	The Planning Inspectorate noted the RAG classifications are not defined in published advice and guidance and the Applicant's Issues Tracker explains their approach to defining the RAG status. The Planning Inspectorate advised that, matters should ideally be reflected as amber, up to a point it is resolved for the issue to be reflected as green.	The comments with regard to the RAG rating were taken on board and the Applicant has taken a more conservative approach to the position at submission to reflect the inevitable requirement for further discussion during examination on certain matters. There are some matters, however, that even with this approach are sufficiently mature to record as

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
		and Issues Tracker		'green'. Note that the final column reflects the position the Applicant expects to reach by the end of Examination, and it is expected that all matters will have progressed to a position where the ExA can make a fully informed recommendation to the Secretary of State.
161	11 March 2026 Project Update Meeting	Draft DCO documents / Pre-application submission – update – Draft Lands and Rights Negotiation Tracker	The Planning Inspectorate confirmed the Applicant's draft appears to include headings that align with the detailed template available in the pre-application prospectus. The Planning Inspectorate advised that the drop-down list under " <i>description of rights sought</i> " could potentially fit better under the " <i>categories of rights</i> " heading.	The Applicant discussed the template for the Pre-application Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4) further with the Planning Inspectorate at the Project Update Meeting on the 11 March 2026. The Applicant confirms it has considered the advice provided in the preparation of the document and amended the headings in the Pre-application Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4) accordingly.
162	11 March 2026 Project Update Meeting	EIA update	Regarding the interface with Portsmouth Water's project, the Planning Inspectorate advised that on other DCO projects with overlapping activities, applicants had prepared a document setting out the approach to coordination	The interface with Portsmouth Water's proposed or existing infrastructure will be managed by protective provisions within the dDCO (Document reference 3.1, DCO Volume 3) as well as commercial discussions and agreements. The

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
			and management of impacts, and it may wish to consider if this would be useful. The Applicant stated that interfaces would be addressed primarily through the dDCO.	Applicant is not intending to prepare an interface document. Environmental assessments have informed mitigation that is secured through the dDCO which will manage any impacts arising through interactions with Portsmouth Water's proposed or existing infrastructure.
163	11 March 2026 Project Update Meeting	EIA update	The Applicant confirmed that environmental mitigation and enhancement areas may seek to address both mitigation and net gain requirements. The Planning Inspectorate advised that the purpose of environmental measures, and how they are intended to meet different policy tests, should be clear in the application documentation.	Environmental Mitigation and Enhancement Areas are shown on the Works Plans (Document reference 2.3, DCO Volume 2) and secured through the Design Principles Document (Document reference 5.11, DCO Volume 5) which draws a distinction between 'environment mitigation' and 'additional environmental enhancement'. Environmental mitigation are works to mitigate the potential adverse environmental effects of the Project that have been assessed and are reported in the ES. Such environmental mitigation can take a number of different forms including avoiding or limiting the extent of the potential adverse effect, improving or enhancing existing habitats or providing replacement habitats. In each case the provision of the environmental

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
				<p>mitigation is necessary to deliver the Project within the 'Rochdale Envelope' assessed in the ES. The Applicant is seeking land rights to deliver environmental mitigation through the DCO.</p> <p>In addition, the Applicant has also identified 'additional environmental enhancements' where it considers it would be appropriate in land use planning terms and beneficial environmentally, to carry out additional environmental enhancements. However, such additional enhancements are not necessary for the delivery of the Project and so the Applicant is not seeking land rights through the DCO for the delivery of these. The Applicant intends to continue to negotiate with the persons with interests in the land identified for the additional environmental enhancements, but their delivery is subject to agreeable terms being reached in a timely manner.</p>
164	11 March 2026 Project Update Meeting	Post meeting note	Under Regulation 12(5)(g) of the Environmental Information Regulations 2004 (EIR), public bodies have a responsibility to avoid releasing sensitive	Confidential survey and assessment data is provided as confidential annexes in the ES where there is a genuine risk of harm. Confidential bird survey and

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
			<p>environmental information that could bring about harm to sensitive or vulnerable ecological features.</p> <p>Sections of the ES containing specific survey and assessment data relating to the location of sensitive species (e.g., badgers, rare birds, and plants) or other vulnerable environmental features should be provided in separate annexes by the Applicant. This approach reduces the sensitive ecological feature's risk of disturbance, damage, persecution, or commercial exploitation arising from publication.</p> <p>The Applicant's approach should be proportionate and only use these separate annexes for species where there is a genuine risk of harm.</p> <p>All other assessment information should be included in an ES chapter, as normal, with a placeholder providing a justification as to why annexes have been withheld and that a full version of the ES has been submitted to the Planning Inspectorate.</p>	<p>assessment data, including Schedule 1 breeding birds, is provided in ES Appendix 8.5 Ornithology CONFIDENTIAL, Volume II (Document reference 6.2, DCO Volume 6). Confidential badger survey and assessment data is provided in ES Appendix 8.3 Badger CONFIDENTIAL, Volume II (Document reference 6.2, DCO Volume 6). While these confidential annexes cannot be released into the public domain (appropriate placeholders provided in the ES), they are provided to the Planning Inspectorate as part of the ES submitted with the DCO application.</p>
165	11 March 2026	Key issues	The Planning Inspectorate advised that in the absence of the WRMP24 not being	The application refers to the emerging WRMP24, which remains unpublished.

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
	Project Update Meeting		published by the time the application is submitted, that the Applicant ensures the documents reflect the principles behind WRMP19 so far as relevant to the Applicant's project.	Application documents have been drafted on the basis of WRMP19 and the emerging WRMP24.
166	11 March 2026 Project Update Meeting	AOB	The Planning Inspectorate advised that the GIS shapefile should be submitted at least 10 working days in advance of the DCO application submission and for the applicant to consider the published guidance Planning Inspectorate (2024, updated 2026) Nationally Significant Infrastructure Projects: Advice on the Preparation and Submission of Application Documents.	The Applicant has noted this advice and has complied with the guidance.
167	11 March 2026 Project Update Meeting	AOB	The Planning Inspectorate advised the Applicant to communicate their envisaged timeline (opening the relevant representation period as soon as possible and keeping it open for the statutory minimum, working towards it being possible to hold the preliminary meeting in October 2026) to the Local Authorities to aid their resource planning, especially for the submission of the Local Impact Reports. The Planning	The Applicant has noted this advice. The Applicant shared its anticipated timeline with local authorities for the relevant representation period and Local Impact Reports in April 2026, prior to the submission of the DCO application. The Applicant has looked at potential venues for Examination hearings and will engage with local authorities about a suitable venue. Likewise, the Applicant has been in touch with AV companies.

Reference	Date	Topic	Summary of advice received	The Applicant's regard to advice
			Inspectorate advised the Applicant to begin looking for venues and AV companies to ensure the examination could take place without unnecessary delay.	

A.2 Programme Document

Hampshire Water Transfer and Water Recycling Project Programme Document

SOUTHERN WATER
March 2026

1. Purpose of this document

This Programme Document has been prepared by Southern Water and issued pursuant to the Planning Inspectorate's new Pre-application Prospectus¹ published in May 2024.

The Prospectus requests applicants to provide a pre-application Programme Document setting out the main steps that the applicant anticipates taking during the preparation of its DCO application. Whilst not a statutory requirement, it sets out the timetable and activities necessary for an effective pre-application process.

This Programme Document is intended to remain a live document during the pre-application period to reflect the evolution of the project and programme. It is currently anticipated that the Development Consent Order application will be submitted by the end of May 2026.

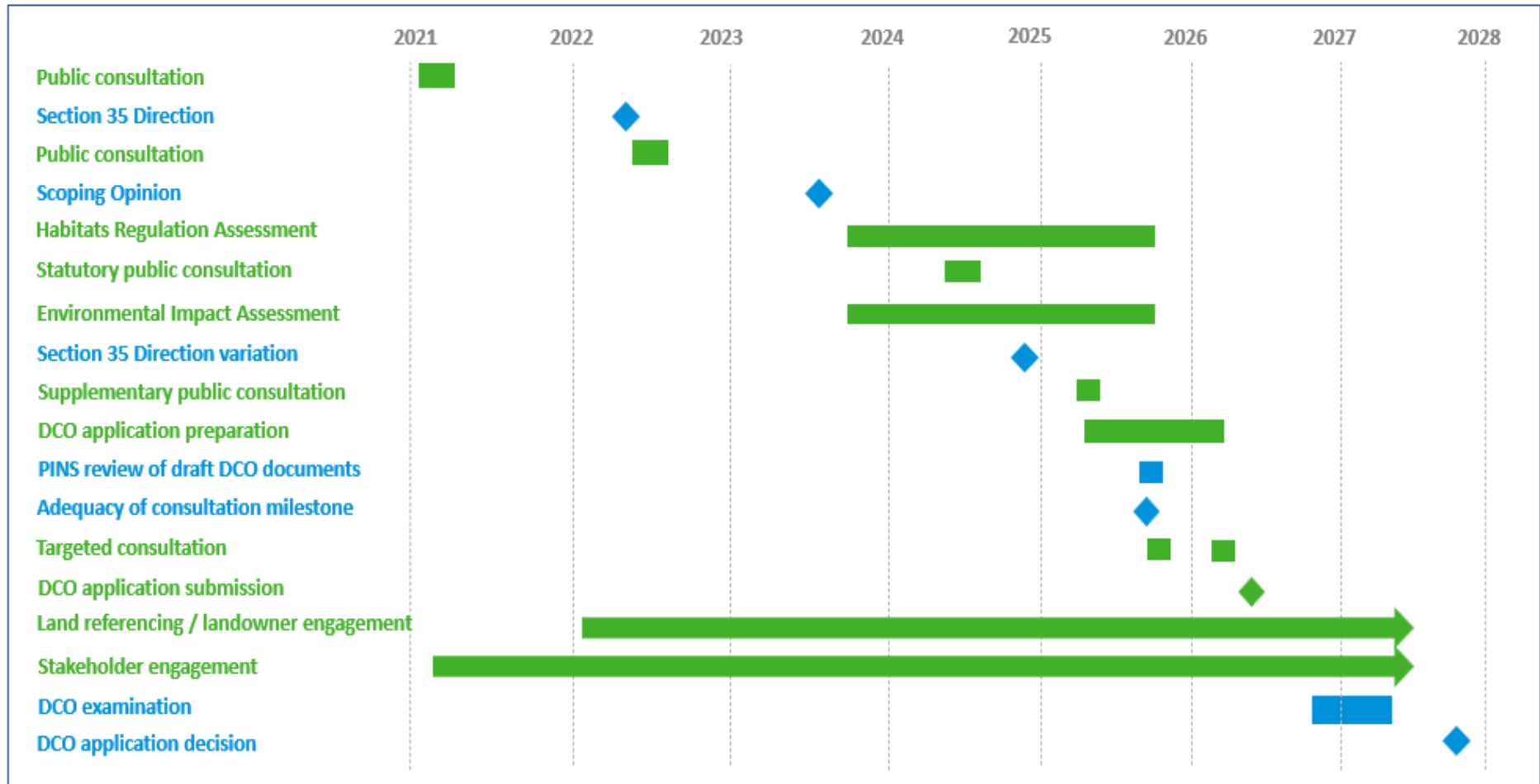
Southern Water has been engaging with statutory bodies and local authorities on the Project since 2021, including on the DCO pre-application programme and key milestones, such as the earlier non-statutory consultation held in 2022, and the more recent statutory Summer 2024, Spring 2025 and Autumn 2025 consultations. Southern Water will continue this ongoing engagement with those bodies to ensure awareness of the project programme.

This document provides the following information:

- Project programme illustrating key project milestones and associated timescales for the pre-application process
- The anticipated timescale for submission of the application for development consent
- Main issues for resolution and how these are being addressed
- Details of pre-application engagement with statutory consultees
- Cross references to Southern Water's Statement of Community Consultation (SoCC)
- Consideration of the identification of risks to achieving the pre-application stage and how these are being managed

¹ [Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/121111/Nationally_Significant_Infrastructure_Projects_2024_Pre-application_Prospectus.pdf)

2. Project Programme



3. Key Issues

Southern Water considers the following to be the main issues arising for resolution to date and has set out the activities that are being, or will be undertaken, to address these during the pre-application period.

Issue	Activity to address the issue
Ensuring sufficient resourcing of statutory bodies, in particular local planning authorities and statutory environmental bodies, so that they can meaningfully engage with our proposals prior to submission of the application.	Ensuring financial support and engagement programme in place with key statutory consultees to cover the pre-application period. Planning Performance Agreements are in place with host local authorities to support cost recovery. For some statutory environmental bodies, 'Discretionary Advice Service' agreements have been utilised in the majority of cases, with some of these now replaced with new cost recovery agreements enabled through changes in 2024 to the Infrastructure Planning (Fees) Regulations 2010.
Clarity of the relationship between Havant Thicket Reservoir and HWTWRP schemes, including in relation to operational interfaces.	Maintaining collaborative working with Portsmouth Water and ensuring clear communications with stakeholders and communities for both projects.
Clarity of the respective roles of the planning and RAPID gated processes.	Engagement with Planning Inspectorate and RAPID, including input into RAPID guidance, to ensure processes can operate effectively in tandem and, wherever practicable, do not duplicate each other.
Alignment of project with Southern Water's Water Resource Management Plan.	Articulating a clear need case for the Project in the event the latest WRMP is not published ahead of DCO examination. A draft need case for the Scheme has been shared with relevant stakeholders for comment.
Securing land interests and rights required for construction and operation of the Project	Progressing land referencing and engagement with relevant landowners to enter into agreements during the pre-application process wherever practicable.
Existing statutory undertaker apparatus that is in close proximity to, or interfaces with, the Project.	Identification of existing apparatus and interfaces to inform technical engagement with statutory undertakers during the design of the Project and to inform the negotiation of protective provisions with third parties.
Concern over future drinking water leads to significant objections to the Project	Ongoing engagement with the Drinking Water Inspectorate to demonstrate compliance with regulatory requirements. Maintain distinct communications with those potentially affected by the construction and operation of the Project that is the subject of the DCO application and with customers likely to be subject to a future change to their drinking water source.
Relevant stakeholders (including statutory consultees/local authorities) expecting more design detail than is proposed at DCO application stage.	Ongoing engagement with relevant stakeholders to underline and provide assurance on the approach to providing an 'outline' level of detail at DCO application informed by parameters, limits of deviation, illustrative designs and design principles.

4. Pre-application Engagement

Planning Inspectorate

Pre-application engagement with the Planning Inspectorate is based on maintaining updates and dialogue at key stages of the project. During the latter half of 2025, the focus of engagement was on the Adequacy of Consultation milestone and pre-application document reviews. A number of pre-application documents were shared with the Planning Inspectorate for review in September 2025. The Adequacy of Consultation Milestone was issued to the Planning Inspectorate in October 2025.

Relevant stakeholders

As at the start of 2026, over 400 external meetings related to the HWTWRP had been held with relevant stakeholders. Engagement with statutory consultees and environmental bodies is ongoing throughout the pre-application period through a structured engagement programme including:

- **Joint Officer Group:** a bi-monthly meeting with local authority lead planning officers to facilitate updates on project progress, opportunities to influence project development and resolve key issues;
- **Local authority bilateral meetings:** ad-hoc one-to-one meetings with local authority lead planning and technical officers to enable focused discussions on project development and localised issues, structured around key project stages and themes (e.g. consultation, design freeze, pipeline routes, above ground plant, mitigation);
- **EIA Working Groups** (local authorities, statutory environmental bodies): 12 structured sessions during the pre-application period with prescribed bodies and local authority technical and lead planning officers to facilitate engagement on the EIA process and supporting environmental assessments and outcomes. The 12 sessions are run in parallel across five sub-groups – Community, Historic Environment & Landscape, Resilience, Emissions & Transport, and Biodiversity & Water; and
- **EA/NE/MMO Technical Working Group:** monthly meeting with technical and area leads to facilitate engagement on matters specific to these environmental bodies (Environment Agency, Natural England, Marine Management Organisation)

To facilitate collaboration and engagement, Planning Performance Agreements are in place with host local authorities to provide financial support via cost recovery. For some statutory environmental bodies, 'Discretionary Advice Service' agreements have been utilised in the majority of cases, with some of these now replaced with new cost recovery agreements enabled through changes in 2024 to the Infrastructure Planning (Fees) Regulations 2010.

In addition to the above, four public consultations on the Project have now been delivered including a targeted consultation during September/October 2025, enabling all consultees and interested parties to comment on the emerging proposals for the Project. The approach to the statutory Summer 2024 consultation is set out in the Statement of Community Consultation (SoCC) which can be found on the HWTWRP consultation website here: [Statement of Community Consultation.pdf](#)

Relevant stakeholders are regularly provided with lookaheads to upcoming discussion topics and timescales for the sharing of draft pre-application documentation.

5. Risk Identification and Management

Set out below are what Southern Water considers to be the main risks to achieving the DCO pre-application programme and the process by which these risks are being managed. All project risks are actively managed using an established risk assessment and mitigation methodology.

Main risks to pre-application stage	Process by which these risks are tracked and managed
<p>Perception of not meeting adequacy of consultation test requiring further pre-application consultation to be undertaken</p>	<p>Delivering a clear approach to consultation, including delivery of four public consultations so far on the Project, including a non-statutory consultation prior to statutory consultation, coupled with tracking compliance with the SoCC and the Gunning Principles, and following a robust feedback loop process to have regard to feedback from the consultations. Consultation is supplemented by regular ongoing engagement with statutory bodies, landowners and communities throughout the pre-application process.</p> <p>The project's 'Adequacy of Consultation Milestone submission presents the 2024 and 2025 statutory consultations in detail, demonstrating the thorough conscientious consideration of all issues raised and official responses to these matters. The submission has been written to present the consultations in more detail to the Planning Inspectorate and demonstrate the adequacy of consultation and engagement activities undertaken prior to submission.</p>
<p>Feedback from statutory consultation triggering a change to the project that could have a material impact on the current pre-application programme as it could, for example, require material design changes or further targeted consultation.</p>	<p>As noted above, Southern Water has already undertaken non-statutory consultation in Summer 2022 in advance of its statutory consultation in Summer 2024, and regularly engages with stakeholders and landowners as it develops the project to understand feedback and reduce the risk of material issues being raised during statutory consultation. Consideration continues to be given to the need for further consultation on any design changes following consultation in line with relevant guidance, and this has supported the Project's approach to its two consultations in 2025 which consulted on design refinements made to the project since Summer 2024. Many of these design refinements were proposed in response to feedback from our Summer 2024 consultation and ongoing engagement.</p>
<p>Material design changes post-Spring 2025 Consultation and Autumn 2025 Targeted Consultation require further public consultation and delay schedules for preparation of the Environmental Statement and DCO application.</p>	<p>Maintain adherence to scheme development process to ensure design development for DCO is progressed in line with the schedule. Effectively manage design issues through risk management and design change processes.</p>
<p>Difficulties in engaging with landowners leading to delays in securing land rights or control over the proposed sites prior to submission</p>	<p>Undertaking detailed land referencing on an ongoing basis to inform landowner engagement with relevant interests and the early negotiation of agreements prior to submission of the DCO application. Southern Water is regularly engaging with landowners and their agents, keeping them updated on progress with the project and discussing their issues and concerns. A Land Agent Group has been established to discuss and agree Heads of Terms ahead of them being issued to landowners.</p>

A.3 Adequacy of Consultation Milestone



Hampshire Water Transfer and Water Recycling Project

Adequacy of Consultation Milestone
October 2025



from
**Southern
Water** 

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Executive Summary

This report is the Adequacy of Consultation Milestone (AoCM) submission by Southern Water, the Applicant, to the Planning Inspectorate. Its primary purpose is to summarise the pre-application consultation undertaken for the Hampshire Water Transfer and Water Recycling Project (the Project) and confirm that the Applicant has complied with the statutory consultation requirements set out in the Planning Act 2008. Completing this milestone enables the Planning Inspectorate to assess the adequacy of consultation, thereby reducing potential risks before the formal submission of the Development Consent Order (DCO) application in Spring 2026.

The Applicant has conducted a total of five public consultations, three of which have been statutory, between 2021 and 2025. The Project has evolved through this iterative process, supported by ongoing engagement that has provided continuous feedback. To ensure the consultation process is fair, lawful and worthwhile, the Applicant has applied the Gunning Principles guidelines.

The Applicant has undertaken the following consultations.

Non-statutory Public Consultation 2021 (February to April 2021)

This initial consultation focused on a proposed desalination plant as the preferred solution to the water supply shortfall faced in Hampshire. Feedback raised concerns about the environmental impacts, cost, and energy, with the majority of respondents favouring water recycling and water transfer alternatives. Following this feedback and a further extensive options appraisal, desalination was confirmed as the least preferred option, and the current combination of water transfer and water recycling was identified as the new preferred solution.

Non-statutory Summer 2022 Consultation (July to August 2022)

This stage gathered views on the new approach, including the proposed location of the Water Recycling Plant, pipeline corridors, and locations for Above Ground Plant. Key public concerns included drinking water quality, potential environmental impacts, and potential construction traffic disruption. This feedback helped to refine the proposed pipeline routes and the design of the Project.

Statutory Summer 2024 Consultation (May to July 2024)

This consultation detailed the overall Project, proposed pipeline routes, Above Ground Plant and Water Recycling Plant locations, and preliminary environmental information. The Applicant drafted a Statement of Community Consultation (SoCC) in accordance with relevant legislation and guidance, and in consultation with local authorities. The Applicant complied with this document by carrying out extensive notification and advertising to raise awareness and engage with local communities who might be affected by the construction and operation of the Project.

Feedback themes included the sustainability of the Project, potential health impacts of recycled water, noise and vibration, and environmental water quality concerns related to Havant Thicket Reservoir and the Solent. In response to this feedback and as a result of

further Project development, the Applicant subsequently shared extensive water quality modelling and made refinements to the design of the Project which were shared at the next consultation.

Statutory Spring 2025 Consultation (March to April 2025)

This consultation focused on updated environmental water quality modelling and the previously noted design refinements. An Approach to Consultation document was drafted by the Applicant and included commitments about how the consultation would be undertaken. This reflected the principles contained in the 2024 SoCC, which allowed for further targeted and proportionate consultation as appropriate. The Applicant met these commitments by publicising the consultation and directly contacting stakeholders.

Feedback questioned the water quality modelling findings, specifically related to potential impacts on the Havant Thicket Reservoir and connected downstream water bodies. Feedback on environmental water quality and the design refinements has been considered in the development of the Project assessments and mitigation, and further refinement of the project design, including the pipeline routes.

Statutory Autumn 2025 Targeted Consultation (September to October 2025)

The Applicant is currently reviewing two responses received to this consultation which was undertaken with landowners on eight localised design refinements. These refinements are minor, and therefore consultation has been limited to those directly affected through land or property interests.

Local authority views

In May 2025, and before the statutory Autumn 2025 Targeted Consultation, local authorities were asked for their views on the Applicant's compliance with the Planning Act 2008. Responses were received from all seven local authorities. All local authorities assessed the Applicant as having complied with the duties to consult and publicise (Sections 42, 47, and 48 of the Planning Act 2008).

Next steps

A Consultation Report and a Statement of Engagement will be submitted with the DCO application. The former will detail the consultations undertaken, and where and how consultation feedback has been considered and used to shape the Project. The latter will summarise the methods of engagement used with stakeholders and communities, and how these activities have influenced the Project's development.

The Applicant has successfully undertaken five public consultations that have followed best practice as set out in the Gunning Principles. This AoCM confirms that the Applicant has complied with the statutory requirements set out in the Planning Act 2008.

1 Introduction

1.1 Purpose of this document

1.1.1 On 30 April 2024, the Government published the ‘Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects’ guidance, the ‘Pre-application Guidance 2024’, and introduced the Adequacy of Consultation Milestone (AoCM). The AoCM allows early consideration by the Planning Inspectorate of the adequacy of consultation undertaken by the Applicant and therefore reduces risk at the acceptance stage of the Development Consent Order submission. The Pre-application Guidance 2024 sets out:

‘The AoCM should be early enough to enable applicants to consider how to undertake any additional engagement that may be needed, but sufficiently towards the end of the pre-application stage to assess the adequacy of the consultation that has been done. It is likely therefore to be no later than around 3 months before the intended date of submission of the application.’

‘The AoCM milestone should be recorded by the Applicant and submitted to the Planning Inspectorate as a short statement of the elements of consultation which have been carried out compared with the components set out in the Programme Document and the SoCC. The statement should include the views and any relevant supporting material from local authorities if available.’

‘The AoCM is an informal but nonetheless important opportunity to check that the pre-application programme is on track, and if it is seriously adrift the Planning Inspectorate will advise the Applicant about the steps necessary to enable the application to be submitted having fulfilled the statutory requirements. Inevitably this could mean a renegotiation of the expected date of submission, with the objective of avoiding the prospect of an application not being accepted for examination.’

1.1.2 In addition to the Pre-application Guidance 2024, the Planning Inspectorate issued the ‘Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus’ (October 2025), the ‘Pre-application Prospectus 2024’. Both the Pre-application Guidance 2024 and Pre-application Prospectus 2024 set out the requirements for the AoCM.

1.1.3 This report provides an overview of the engagement and consultation activity to date and how Southern Water Services Limited (hereafter referred to as ‘the Applicant’) has complied with the Planning Act 2008 statutory consultation provisions and submitted this report in accordance with the Pre-application Guidance 2024 and Pre-application Prospectus 2024.

1.2 The Project

1.2.1 The Hampshire Water Transfer and Water Recycling Project (hereafter referred to as ‘the Project’) is being developed by the Applicant who is responsible for supplying water and wastewater services to over four million customers in the South East of England. The Applicant’s operations cover Hampshire, Kent, the Isle of

Wight and East and West Sussex, over 700 miles of coastline, National Parks, forests and Areas of Outstanding Natural Beauty (National Landscapes).

- 1.2.2 The South East of England is designated by the Environment Agency as an area of 'serious water stress', meaning that demand can outstrip supply, especially during a drought. The Environment Agency has said an extra 5 billion litres of water a day needs to be found by 2055 in the UK, with half of this being in the South East. In Hampshire in particular, a growing population, climate change and reduced abstractions on the County's two main rivers, the River Test and River Itchen chalk streams, mean the Applicant is facing a significant water supply shortfall. The Project, which is part of the Applicant's Water for Life – Hampshire programme, is being undertaken to address this challenge by providing a new, sustainable source of water ensuring a resilient water supply for its Hampshire supply area.
- 1.2.3 The Applicant's existing Water Resources Management Plan (WRMP19), which forecasts future water demand and sets out options to address this, identifies the need for a strategic water resource option within the Western (Hampshire) supply area, from which the Project has been determined as the preferred solution to meet this need. The Applicant's emerging WRMP24 (final draft published in 2025) continues to identify the Project as the only solution capable of addressing this challenge.
- 1.2.4 The Project comprises the construction, operation and maintenance of the following components:
- Water Recycling Plant and associated pumping stations.
 - Underground pipelines between Budds Farm Wastewater Treatment Works and the Water Recycling Plant.
 - Pipelines between the Water Recycling Plant site and Bedhampton Springs, connecting into pipelines being delivered by Portsmouth Water between Bedhampton Springs and Havant Thicket Reservoir.
 - Underground pipeline between the Water Recycling Plant site and Otterbourne Water Supply Works.
 - Above Ground Plant comprising Intermediate Pumping Stations and Break Pressure Tanks located along the Pipeline between the Water Recycling Plant and Otterbourne Water Supply Works.
- 1.2.5 The Project would also comprise the use of the following infrastructure:
- Use of Havant Thicket Reservoir for the storage of recycled water.
 - The use of the Eastney Long Sea Outfall, Eastney Pumping Station, and Eastney Transfer Tunnel for the release of reject water (containing impurities removed from the treated wastewater) from the Water Recycling Plant.
 - The use of pipelines consented separately by Portsmouth Water for the transfer of recycled water and source water between Bedhampton Springs and Havant Thicket Reservoir.
- 1.2.6 The construction and operation of the Project would include other works such as landscaping and environmental mitigation measures.

1.3 Pre-application consultation

- 1.3.1 The Applicant acknowledges that the Planning Act 2008 places significant emphasis on pre-application consultation. Accordingly, substantial effort has been dedicated to undertaking meaningful engagement and consultation with the local community, persons with an interest in land, local authorities, statutory consultees, and other relevant stakeholders. As a result, the Project has evolved through an iterative process and multiple stages of project development.
- 1.3.2 The Gunning Principles provide guidelines for effective consultation. The Applicant has used these principles, which are engaging early, providing sufficient information, allowing adequate time, and considering responses, to each stage of pre-application consultation to ensure the process is fair, lawful and worthwhile.
- 1.3.3 The main stages of the Applicant's pre-application consultation are summarised in **table 1-1**. The terms summarised in **table 1-1** are used throughout this report to describe specific consultation stages.

Table 1-1 Consultation stages

Date	Consultation activity
8 February to 16 April 2021	Non-statutory Public Consultation 2021
5 July to 16 August 2022	Non-statutory Summer 2022 Consultation
16 February to 19 April 2024	Consultation on the 2024 Statement of Community Consultation (SoCC)
29 May to 23 July 2024	Statutory Summer 2024 Consultation
5 March to 4 April 2025	Statutory Spring 2025 Consultation
10 September to 8 October 2025	Statutory Autumn 2025 Targeted Consultation

- 1.3.4 Consultation with stakeholders and the local community is playing a key role in shaping decisions at various stages throughout the evolution of the Project, including decisions regarding use of water recycling, the preferred pipeline corridors, the proposed locations for Above Ground Plant and the proposed pipeline routes. Consultation has also helped inform the scope of the environmental assessments, seeking views on preliminary environmental impacts and shaping mitigation proposals.
- 1.3.5 Consultation is being carried out at multiple stages of the Project to strike a balance between engaging early and ensuring sufficient detail is available for consultees to provide meaningful feedback. This approach enables the Applicant to meaningfully consider input during the iterative design process of the Project. At each consultation stage to date, the Applicant presented information as clearly as possible in different forms and media to enable in person and online access, outlining how stakeholders could participate, and provided defined deadlines and formats for submitting feedback. The Applicant also considered accessibility when planning consultation events and used targeted engagement with seldom heard groups.
- 1.3.6 In between formal consultation activities, the Applicant has engaged with stakeholders through Local Planning Authority Joint Officer Group meetings,

Environmental Impact Assessment (EIA) Working Groups, bilateral meetings, and other direct engagement with local interest groups, members of the public, and statutory organisations.

1.4 Programme Document

- 1.4.1 In accordance with the Planning Inspectorate issued Pre-application Prospectus 2024 and Pre-application Guidance 2024, the Applicant has prepared a pre-application Programme Document. It sets out the main steps that the Applicant anticipates taking during the preparation of the DCO application. Whilst not a statutory requirement, it sets out the timetable and activities necessary for an effective pre-application process. The components set out in the Programme Document are explained in the AoCM.
- 1.4.2 The Programme document was initially provided by the Applicant to the Planning Inspectorate in July 2024. An updated version of the Programme Document was issued in October 2025 and is available to view on the Applicant's consultation website at <https://www.hampshirewtwrp.co.uk>.

1.5 Environmental Impact Assessment

- 1.5.1 Environmental Impact Assessment (EIA) assesses the likely significant effects of the Project during the construction, operation (including maintenance) and decommissioning phases of the Project. It is an iterative process that identifies and describes likely significant effects of the Project on the environment. It seeks to avoid or reduce negative environmental effects through mitigation, where appropriate, and promote positive effects as a result of the Project, culminating in the preparation of an Environmental Statement that is submitted with the DCO application. The Environmental Statement that is currently being prepared is taking into account and being influenced by:
- Findings of the EIA Scoping Report submitted on 21 July 2023 taking account of the EIA Scoping Opinion adopted by the Secretary of State on 31 August 2023.
 - The preliminary assessment findings and likely significant effects of the Project set out in the Preliminary Environmental Information (PEI) Report shared at the statutory Summer 2024 Consultation and Environmental Water Quality Report shared at the statutory Spring 2025 Consultation.
 - Consultation responses received from the non-statutory Summer 2022 Consultation, the statutory Summer 2024 Consultation and statutory Spring 2025 Consultation.
 - Other comments and feedback received from statutory consultees and stakeholders during the pre-application and EIA process through separate engagement.
- 1.5.2 Consultation feedback is helping to shape the approach to environmental assessment, as well as the development of appropriate mitigation. All mitigation measures taken into account in the EIA will be set out in a Commitments Register,

to be submitted as part of the DCO application, that will confirm how identified mitigation will be secured within the DCO.

2 Non-statutory Public Consultation 2021

2.1 Approach

- 2.1.1 The purpose and intent of the non-statutory Public Consultation 2021 was to consult on the Applicant's desalination proposal, as presented in the Water Resources Management Plan (WRMP) 19 Preferred Strategy. A 75 Ml/d (million litres per day) desalination plant was proposed at Fawley with direct input into the Applicant's water supply network at Testwood Water Supply Works via a proposed underground pipeline. The desalination proposal was presented as the 'base case' and the preferred solution at the time.
- 2.1.2 As required by the Regulators Alliance for Progressing Infrastructure Development (RAPID) Gated process, alternative options also needed to be investigated in the event that desalination should prove not to be deliverable. The alternatives consulted on were a smaller capacity desalination proposal, alongside water recycling and water transfer proposals. These were described as back-up solutions.
- 2.1.3 The non-statutory Public Consultation 2021 was proposed to be six weeks in length, and although the UK government lifted some COVID-19 restrictions on 8 March 2021, the Applicant adopted a 'digital first' approach as consultation activities, such as in-person events, were not possible at the time.

2.2 Delivery of the non-statutory Public Consultation 2021

- 2.2.1 The non-statutory Public Consultation 2021 was launched on 8 February 2021 and was scheduled to close on 23 March 2021. The consultation was extended from the original 42 days following feedback from residents of Fawley suggesting they had not been contacted directly or had not seen the consultation promotion. The Applicant responded by distributing notification letters and extended the non-statutory Public Consultation 2021 to close on 16 April 2021.
- 2.2.2 To promote the non-statutory Public Consultation 2021, the Applicant shared communications across its Facebook, Twitter and LinkedIn pages throughout the consultation period to raise awareness. In the Applicant's initial engagement with each of the affected Local Planning Authorities, support was requested to help to improve the reach of digital communications. As a result, the consultation links were shared via numerous newsletters, mailing lists and social media channels, including the Local Planning Authorities' social media channels. A similar request was also made to other organisations and individual stakeholders to share via their networks. A total of 14 posts were published, including a Facebook advertisement.
- 2.2.3 A consultation press release was issued to local publications, radio and trade press on 8 February 2021. Advertorials were placed in local newspapers.
- 2.2.4 The Applicant sent notification emails and letters to statutory stakeholders as well as relevant non-statutory stakeholders and people who had expressed an interest in the desalination proposal and had provided contact information. Additionally, the Applicant asked Local Planning Authorities to provide details of seldom heard

groups to enable the Applicant to contact these groups to advise them of the consultation.

2.2.5 The Applicant updated the Water for Life – Hampshire Programme’s website with details of the consultation and to direct people to a virtual exhibition to have their say on the proposals.

2.2.6 The virtual room was set up so the public and stakeholders could access consultation material during a time of COVID-19 restrictions which prevented in-person public exhibitions. The virtual room attracted 3,224 visitors where consultation material could be viewed, and an online feedback form was available to give feedback. Consultees could also submit feedback by email.

2.3 Consideration of feedback

2.3.1 The Applicant received 180 responses. These were split into 143 online feedback form submissions and 37 emails and letters.

2.3.2 In September 2021, the Applicant published a Consultation Feedback Report which provides a summary of the consultation activities and an overview of the main themes that emerged from the consultation responses.

2.3.3 **Table 2-1** below provides a summary of the feedback themes that were identified throughout the non-statutory Public Consultation 2021 and how these responses are shaping the Applicant’s final proposals.

Table 2-1 Summary of issues raised at the non-statutory Public Consultation 2021 and how they are shaping the application

Issue raised at consultation	How consultation responses are shaping the application
The Applicant received feedback that suggested alternatives to desalination due to energy, cost and environmental impacts. Some respondents perceived that water transfer alternatives would have fewer environmental impacts and lower costs.	Following the non-statutory Public Consultation 2021, the Applicant undertook an extensive options appraisal which confirmed desalination as the least preferred option. The combined solution of water transfer and water recycling, which is the Project, emerged as the most preferred solution to address the water supply deficit in Hampshire.
The Applicant received feedback about the drinking water quality from the proposed desalination plant.	The Applicant acknowledges that although desalination is no longer being pursued, concerns around drinking water continue to be taken into consideration as part of the Project.
The Applicant received feedback regarding the impact of the wastewater (brine) release into the Solent, with respondents questioning the location of the	Impacts on the Solent were one of the contributing factors for the decision not to progress the desalination option further. As a result, despite water quality impacts still being considered as part of the Project, it is

Issue raised at consultation	How consultation responses are shaping the application
release due to its shallow depths, possible effects on the tidal flow and impact on bathing water quality and recreational activity.	no longer of concern in this area of the Solent.
The Applicant received feedback regarding the impact of abstraction and discharge pipes, particularly the impact of construction on the seabed off Calshot and possible fish entrainment in the pipelines.	Although the desalination proposal is no longer being pursued and these matters are no longer a concern in this area, the Applicant continues to consider these themes within the Project.
The Applicant received feedback regarding the impact the desalination process would have on biodiversity. In particular the possible impact of abstracting water from the Solent for the desalination process and discharging cleaned wastewater (brine) on the marine environment.	Although the desalination proposal is no longer being pursued and these impacts are no longer a concern in this area, impacts on the water environment continue to be taken into consideration as a part of the Project
The Applicant received suggestions that the proposed desalination plant should be located on a brownfield site or located away from residential areas and Ashlett Creek, as respondents were worried about further urbanisation of waterside developments.	As desalination is not being progressed by the Applicant at this time, the siting of the proposed desalination plant is no longer a concern. However, a similar approach to site selection was considered in the identification of the site for the proposed Water Recycling Plant.
The Applicant received feedback regarding the landscape and visual impact of the proposed desalination plant. This concern was particularly in regard to the proximity to the New Forest National Park, the coast and the surrounding area.	Landscape and visual impact of the desalination plant on the New Forest National Park was one of the contributing factors for the decision not to progress the desalination option further. As a result, landscape and visual impacts are no longer of concern in this area, but continue to be considered as part of the Project.
The Applicant received feedback relating to impacts on many aspects of the environment.	The desalination plant and associated underground pipelines are no longer being pursued, and therefore their potential environmental impacts are no longer

Issue raised at consultation	How consultation responses are shaping the application
	relevant in this area. However, feedback relating to potential environmental impacts is being considered as part of the Project the Applicant is now progressing.

2.4 Summary

- 2.4.1 Results from the non-statutory Public Consultation 2021 showed that a significant proportion of respondents agreed that water recycling alternatives would be an acceptable alternative to a desalination plant at Fawley. Considering this, and the feedback received from consultees on the desalination process and potential impacts on the environment, an Options Appraisal Process was carried out in 2021. This appraisal confirmed that a desalination plant at Fawley was the least preferred option, and water transfer and water recycling emerged as the new preferred solution. The Applicant engaged with regulators and other stakeholders on the options appraisal process and confirmed the new preferred solution in December 2021.
- 2.4.2 Ahead of the non-statutory Summer 2022 Consultation, the Applicant undertook further site selection for the Water Recycling Plant, developed pipeline corridors and established Above Ground Plant zones.

3 Non-statutory Summer 2022 Consultation

3.1 Approach

- 3.1.1 The Applicant presented the Project as a drought resilience scheme and undertook consultation to gather views on the initial proposals.
- 3.1.2 The Applicant consulted on and invited feedback regarding:
- The use of water recycling as a new sustainable water source for the Hampshire area.
 - The location of the proposed Water Recycling Plant.
 - The preferred corridors for the pipelines required to transfer water between Budds Farm Wastewater Treatment Works, the proposed water recycling plant, Havant Thicket Reservoir and Otterbourne Water Supply Works.
 - The proposed zones for Above Ground Plant required along the pipeline route to Otterbourne Water Supply Works.
 - The decision-making processes the Applicant followed in each case to identify sites, zones and pipeline corridors.
- 3.1.3 A hybrid approach was taken to consultation, with information available online on a dedicated Project website, through webinars and in-person events.
- 3.1.4 The strategy was to undertake the non-statutory consultation using the same principles that would be used for subsequent statutory consultations. This included consulting the parties that would be required to be consulted for the statutory consultation under Section 42 of the Planning Act 2008, and non-statutory consultees.
- 3.1.5 Non-statutory consultees were selected during a stakeholder mapping exercise undertaken by the Applicant, to account for geographical change and to establish stakeholders in the affected area and those that may be interested in the Project. This was undertaken by referring to and reviewing information held by the Applicant on consultees and collaborating closely with relevant stakeholders and local authorities to ensure that information was correct and updated. Consultation zones were also established to manage consultee notification. Seldom heard groups were identified by collaborating with the local authorities to ensure that information about these groups was available to the Applicant.
- 3.1.6 On 28 April 2022, the Applicant presented its approach to consultation at a Joint Officer Group meeting and requested feedback.

3.2 Delivery of the non-statutory Summer 2022 Consultation

- 3.2.1 The non-statutory Summer 2022 Consultation was held from 5 July to 16 August 2022 for a total of six weeks.
- 3.2.2 The Applicant undertook several activities to publicise the non-statutory Summer 2022 Consultation across its identified Consultation Zones. Activities undertaken included:

- Letters sent to persons with an interest in land in respect of the Project and those within the Primary Consultation Zone (properties and businesses that lay 500 metres either side of the corridor sections)
- Advertisements placed in local newspapers to reach those in the Secondary Consultation Zone (a zone that extended to the boundaries of Parish Councils that crossed the corridor sections which were located within the Primary Consultation Zone)
- Posters distributed to key locations to reach those in the Secondary Consultation Zone
- Stakeholder briefings (on an invitation only basis).

3.2.3 Consultation materials were made available on the website for the Project, hosted on Commonplace, and at nine deposit locations. The consultation materials contained information about the Project and included:

- Consultation Brochure Public Consultation 2022
- Scheme Development Summary Public Consultation 2022
- Book of Maps Public Consultation 2022
- Frequently Asked Questions (FAQs)
- The feedback form alongside the data protection statement.

3.2.4 During the non-statutory Summer 2022 Consultation, the Applicant hosted six drop-in sessions, and three webinars where those who were interested could register to attend.

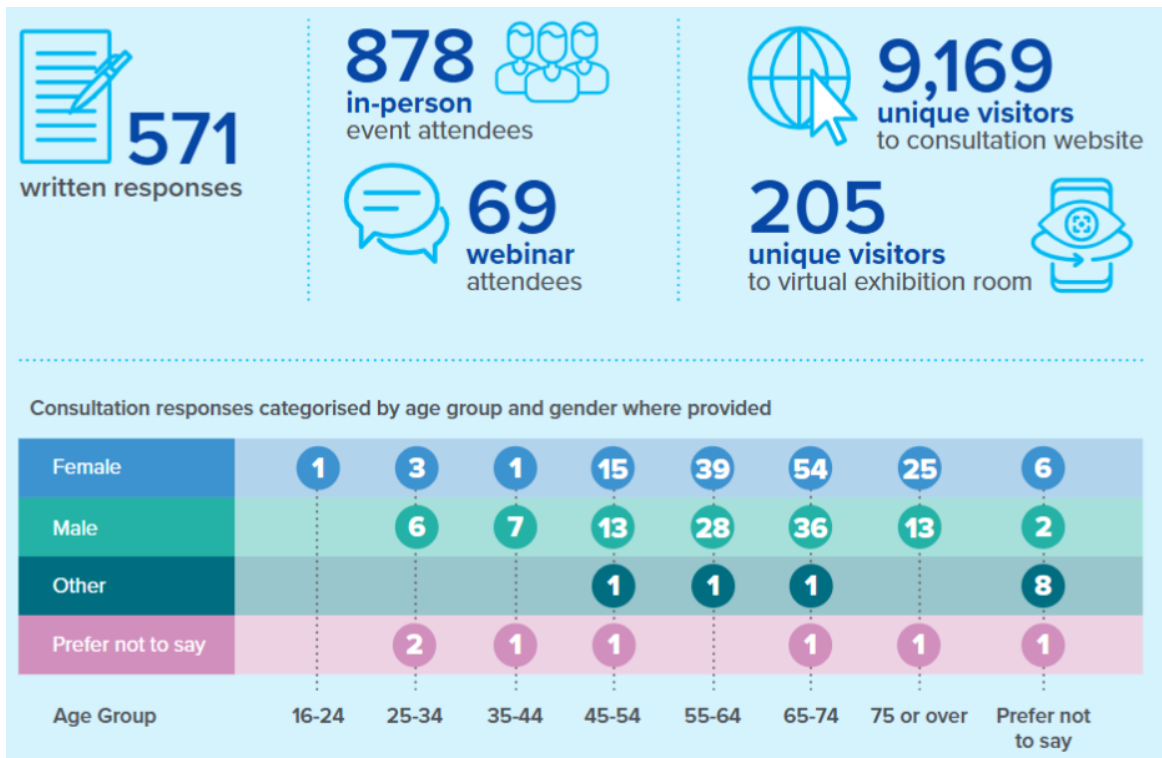
3.2.5 The following response methods were available for people to provide feedback during the consultation:

- An online feedback form available via the website
- Hard-copy feedback form
- A freepost address (FREEPOST HAMPSHIRE WTWRP CONSULTATION) was set up so respondents could send either the printed feedback form or other feedback to the Project
- Feedback could be emailed to the dedicated email address for the Project: HampshireWTWRP@southernwater.co.uk

3.3 Consideration of feedback

3.3.1 A total of 571 responses to the consultation were received, this included 69 hard-copy feedback forms via the freepost address, 449 online feedback forms, and 53 emails. **Graphic 3-1** below shows other statistics for the non-statutory Summer 2022 Consultation.

Graphic 3-1 Statistics from the non-statutory Summer 2022 Consultation



3.3.2 In May 2024, and as part of the statutory Summer 2024 Consultation, the Applicant published a Summer 2022 Consultation Response to Feedback Report which provides a summary of the consultation activities, an overview of the main themes that emerged from the consultation responses, and an explanation of how the Applicant had been considering the issues raised in the development of the Project. The responses included in the Summer 2022 Consultation Response to Feedback Report represent a point in time and the Applicant continues to refine the design of the Project.

3.3.3 **Table 3-1** below provides a summary of the feedback themes that were identified throughout the non-statutory Summer 2022 Consultation and how these responses are shaping the Applicant’s final proposals.

Table 3-1 Summary of issues raised at non-statutory Summer 2022 Consultation and how they are shaping the application

Issue raised at consultation	How consultation responses are shaping the application
<p>The Applicant received feedback about the quality of drinking water and potential changes to its taste and smell.</p>	<p>Between 2019 and 2023, the Applicant developed a Water Recycling Pilot Plant with Brighton University to replicate the water recycling process. An aim of this activity was to discuss the technology with stakeholders, and to alleviate customer and stakeholder concerns. The Applicant continues to reassure stakeholders that drinking water will continue to meet strict regulatory standards, which are regulated and overseen by the Drinking Water Inspectorate (DWI), and has confirmed that a communications plan is being developed and will be put in place to keep customers informed when a change in water source takes effect.</p>
<p>The Applicant received feedback around the potential environmental impacts of recycled water on biodiversity, wildlife and ecology.</p>	<p>The Applicant's Summer 2022 Consultation Summary of Feedback Report noted the Applicant was working with Portsmouth Water to consider water quality and that environmental assessments would be undertaken to consider impacts and mitigation to ensure the local environment and marine life is protected during the delivery of the Project. Further information was subsequently shared at later stages of consultation and feedback from this continues to inform the Applicant's methodology, assessments and any necessary mitigations.</p>
<p>The Applicant received feedback on the level of information provided about the potential environmental impacts of releasing reject water (water containing impurities removed from the treated wastewater) into marine environment.</p>	
<p>The Applicant received feedback around the sustainability of the water</p>	<p>The Applicant acknowledged this feedback in the Summer 2022 Consultation Response to Feedback Report which was published on the</p>

Issue raised at consultation	How consultation responses are shaping the application
<p>recycling process and the energy and maintenance to build and operate the Water Recycling Plant.</p>	<p>Project website in May 2024. It noted that its consideration of alternatives had resulted in the selection of water recycling and transfer as the most sustainable solution and that consideration of energy and carbon will help reduce emissions during the construction and operation phases. The Applicant provided information on the Project's likely impacts and mitigation at subsequent stages of consultation and continues to consider feedback as it develops the assessments, mitigation and management plans as part of the DCO application in Chapter 10 of the Environmental Statement.</p>
<p>The Applicant received feedback surrounding the potential for disrupting areas of natural beauty, as well as potential visual impacts on the local landscape.</p>	<p>The Applicant acknowledged this feedback in its Summer 2022 Consultation Response to Feedback Report, published on the Project website in May 2024. It noted that it was continuing to undertake a variety of surveys, studies and investigations, as well as engagement with local authorities and key stakeholders to inform the design of the Project to avoid or reduce landscape and visual impacts. This continues to be the case as the Project is refined prior to the DCO application submission.</p>
<p>The Applicant received feedback around the potential impact on the local road network during construction, particularly on Park Lane, Middle Park Way, Titchfield Lane, Knowle Road, Portsdown Hill and Bedhampton Road.</p>	<p>The Applicant acknowledges this feedback surrounding traffic and transport and noted that various issues and constraints had been taken into account in developing the design up to non-statutory Summer 2022 Consultation and that surveys and assessments, as well as engagement with the local highway authorities and National Highways, would continue to inform the development of the Project and the next stage of consultation.</p> <p>Titchfield Lane and Bedhampton Road will be assessed in Environmental Statement Chapter 18 Traffic and Transport and, separately, the Transport Assessment. There would be minimal impact on Bedhampton Road. Construction traffic impacts on</p>

Issue raised at consultation	How consultation responses are shaping the application
	<p>Titchfield Lane would be managed through the Framework Construction Traffic Management Plan. Following the statutory Summer 2024 Consultation, the temporary construction compound access has been relocated to the east, closer to the junction with the A334. This reduces potential impacts of construction traffic on residential receptors along Titchfield Lane.</p> <p>Knowle Road is not assessed in Chapter 18 of the Environmental Statement and the Transport Assessment as there would be no impact on this road. Middle Park Way and Park Lane would not be impacted following the tunnel option to Havant Thicket Reservoir being removed and are also excluded from the assessment as a result.</p> <p>The Applicant is also engaging closely with Hampshire County Council on all highway matters. Information about environmental impacts from the Project's construction, including proposed mitigation, were consulted on as part of the Applicant's statutory Summer 2024 and Spring 2025 Consultations and will be reported on in various chapters of the Environmental Statement. The Applicant continues to work with the local highway authorities and National Highways to address and mitigate likely impacts on the local road network, informing the measures included in the traffic management plans that will be submitted as part of the DCO application.</p> <p>Project-wide measures to control construction dust, including dust arising from track out (heavy vehicles leaving the site and transferring material to the local highway network), as well as proposed emissions standards to reduce construction road vehicle emissions and a proposed Construction Worker Travel Plan that supports and encourages sustainable travel, are contained within the Outline Construction Environmental Management Plan (CEMP).</p>

Issue raised at consultation	How consultation responses are shaping the application
<p>The Applicant received feedback around potential landfill gas emissions from the Water Recycling Plant site (previously referred to as Site 72) and other environmental impacts including dust and noise pollution.</p>	<p>The Applicant acknowledged this feedback in its Summer 2022 Consultation Summary of Feedback Report, published on the Project website in May 2024. The report noted that the Applicant was continuing to undertake a variety of surveys, studies and investigations, as well as engagement with relevant stakeholders to inform the design of the Project to avoid and reduce construction related impacts, including those arising from construction works in areas of landfill.</p> <p>Where landfill gas risks have been identified through the Applicant’s investigations and assessments, ground gas protection measures will be incorporated into the detailed construction design. These measures would be secured in the design principles for safety and set out in the Design Principles Document which will be submitted as part of the DCO application.</p> <p>Dust and noise emissions measures to reduce impacts will be set out in the Outline Construction Environment Management Plan. This will be further developed by the appointed Contractor at the detailed design stage.</p>
<p>The Applicant received feedback around the location of Above Ground Plant and the interface with the historic environment.</p>	<p>The Applicant acknowledged this feedback in its Summer 2022 Consultation Summary of Feedback Report, published on the Project website in May 2024. It noted that it was continuing to refine the design of the Project, alongside ongoing surveys and investigations, as well as engagement with local authorities and Historic England, to avoid and reduce impacts on the historic environment. This continues to be the case as the Project is refined prior to the DCO application submission.</p>
<p>The Applicant received feedback surrounding impacts on Hampshire’s underground aquifers during construction.</p>	<p>The Applicant is taking into consideration the importance of the underlying aquifers through design development and the EIA process. The potential impacts on the underground aquifers and dependent receptors, such as</p>

Issue raised at consultation	How consultation responses are shaping the application
	<p>public water supply abstractions, during construction will be assessed within the Hydrogeological Impact Assessment (HIA) which is informing the mitigation requirements. The Applicant has looked to reduce intrusive works within the most sensitive areas, such as Source Protection Zone 1, where practicable. The impacts on underlying aquifers has been discussed with key stakeholders such as the Environment Agency and Portsmouth Water throughout the EIA process at Technical Working Groups, one-to-one engagement and through pre-application review of key documents, such as the HIA and Outline Water Monitoring Plan.</p>
<p>The Applicant received feedback around potential vibration impacts on nearby properties during pipeline installation using tunnelling techniques.</p>	<p>The Applicant acknowledged this feedback in its Summer 2022 Consultation Summary of Feedback Report, published on the Project website in May 2024. Mitigation of vibration impacts on nearby properties has been embedded into the design of the Project by locating those elements with the potential to emit vibration during construction (such as tunnelling) as far as practicable from residential dwellings. It noted that it was continuing to undertake a variety of surveys, studies and investigations, as well as engagement with local authorities and key stakeholders to inform the design of the Project to avoid and reduce potential vibration impacts on nearby properties during pipeline installation using tunnelling techniques. This, along with all construction impacts, continues to be the case as the Project is refined up to the DCO application.</p> <p>Potential mitigation measures for vibration impacts are identified in the Outline Construction Environment Management Plan, and the final package of mitigation will be identified by the appointed Contractor in a Noise and Vibration Management Plan which will be submitted to the local authorities for</p>

Issue raised at consultation	How consultation responses are shaping the application
	approval prior to commencement of construction.
<p>The Applicant received feedback around the Water Recycling Plant’s ability to remove impurities such as chemicals, hormones and microbes.</p>	<p>The Applicant continues to provide assurance around the efficacy of the water recycling process and the fact that water going into supply will continue to meet strict regulatory standards on drinking water quality. These standards are regulated and overseen by the Drinking Water Inspectorate. The Applicant has also undertaken engagement with relevant stakeholders as part of the Water Recycling Pilot Plant, with a particular focus on those based in the Havant area, and carried out a subsequent consultation on environmental water quality, the statutory Spring 2025 Consultation, feedback from which continues to inform the development of the Applicant’s assessments and mitigation.</p>
<p>The Applicant received feedback regarding any possible implications should the pipeline burst.</p>	<p>The Applicant has designed the Project to ensure that the probability of a pipeline bursting is extremely low. Nonetheless, the Applicant set out in its statutory Summer 2024 Consultation how major accidents and disasters would be managed, and this will again be set out as part of the DCO application in the Environmental Statement. This will detail that a 6m strip of land either side of the entire alignment of the pipelines would be required to restrict certain activities that could adversely affect the infrastructure. These activities include prevention of piling or percussive activities, prevention of building a wall or structure (unless easily removed), and anything that could endanger the pipe and cause a leak. This is in line with design principles for safety which will be outlined in the Design Principles Document which will be submitted with the DCO application.</p> <p>Isolation valves would be installed on the pipelines to manage flooding in the unlikely event of a burst. Further mitigation for the risk of flooding and pipe leaks during the operation of the Project will be detailed in the</p>

Issue raised at consultation	How consultation responses are shaping the application
	<p>Outline Operational Management Plan. This includes the formation of an incident team and its operation and de-escalation. These measures will further help to reduce potential flooding from a pipe burst.</p>
<p>The Applicant received feedback around how Havant Thicket Reservoir should only be fed by spring water.</p>	<p>The Applicant acknowledges this feedback, however, the proposed use of Havant Thicket Reservoir for storing recycled water remains a key part of the proposal which is embedded in the need for the Project. It also provides resilience to Havant Thicket Reservoir in times of low water levels. Nevertheless, additional information on recycled water quality was presented in the subsequent statutory Spring 2025 Consultation and feedback from that consultation continues to inform the Applicant's assessments and mitigation in this respect.</p>
<p>The Applicant received feedback around how the pipeline would safely cross under rivers and other waterways.</p>	<p>Engagement regarding the proposed construction methodology has been a key focus of the consultation process. This topic has been discussed in detail through Technical Working Groups held with the Environment Agency, Natural England and local authorities, ensuring that relevant stakeholders are informed and have the opportunity to provide input. Our design proposes the use of trenchless construction methods for crossing main rivers. For other waterways, we are proposing use of both trenchless and open-cut techniques informed by the sensitivity of the watercourses and agreement with key statutory environmental bodies. Construction compounds for these crossings have been sited outside areas liable to flood and sensitive river corridor habitats.</p>
<p>The Applicant received feedback around consultees wanting to be consulted earlier in the process and felt that not</p>	<p>The Applicant has explained at each key stage of consultation how the selection of this Project was informed by a comprehensive options appraisal process undertaken in 2021, as well as through the development of WRMP19 and final draft WRMP24. These</p>

Issue raised at consultation	How consultation responses are shaping the application
<p>enough alternatives had been considered.</p>	<p>processes considered a wide range of potential solutions, initially including desalination and subsequently focusing on water recycling. In addition to four rounds of consultation specifically on this Project the Applicant has also consulted extensively on the WRMPs themselves, including the options presented. This ongoing engagement has ensured that stakeholders have had multiple opportunities to review and comment on the Project and the processes undertaken to select the Project. These comments and responses have been taken into account in the design, assessment, mitigation and development of the Project.</p>
<p>The Applicant received feedback on the proposed location of the Water Recycling Plant (previously referred to as Site 72).</p>	<p>High-level outcomes from the Water Recycling Plant site selection process were initially presented as part of the Applicant's non-statutory Summer 2022 Consultation. Having regard to consultation feedback, a review of the site selection process was undertaken which reaffirmed the original outcome, with no changes to the preferred site identified. This was communicated as part of the Applicant's statutory Summer 2024 Consultation, and the Applicant continues to ensure its site selection process remains robust in light of ongoing stakeholder feedback.</p>
<p>The Applicant received feedback that suggested respondents were not clear why desalination was no longer the preferred option.</p>	<p>The Applicant explained during its non-statutory Summer 2022 Consultation and statutory Summer 2024 Consultation that desalination was no longer preferred because of its potential impacts on the New Forest National Park and the Solent.</p>

3.4 Summary

- 3.4.1 In preparation for the statutory Summer 2024 Consultation, the Applicant reviewed all the feedback received at non-statutory Summer 2022 Consultation and assessed whether design changes to the Project were needed. The Applicant detailed this process in its 2024 Scheme Development Summary, presented as part of the Applicant's statutory Summer 2024 Consultation. This document listed

the changes made along with the considerations outlined from feedback at non-statutory Summer 2022 Consultation.

- 3.4.2 One of the major aspects of the Project where feedback has informed the design is the Applicant's proposed pipeline routes. Feedback has informed the development of the Project from multiple options and corridors, and considered various constraints and issues to identify more specific proposed route alignments.
- 3.4.3 The pipeline corridors at the non-statutory Summer 2022 Consultation were divided into sections so that each section could be evaluated and compared against other pipeline corridor sections. The outcome of this process was the selection of a preferred pipeline corridor which was then consulted upon. These sections were then reviewed based on feedback received at non-statutory Summer 2022 Consultation to develop Sections A through M from the Water Recycling Plant to Otterbourne Water Supply works. These, along with the locations of Above Ground Plant, were presented at the statutory Summer 2024 Consultation. The location of construction compounds along the pipeline route were also carefully reviewed in light of feedback received. These pipeline routes continue to be refined due to ongoing feedback and engagement.

4 Statutory Summer 2024 Consultation

4.1 Approach

- 4.1.1 As part of the statutory Summer 2024 Consultation, the Applicant consulted on the following matters:
- The Project overall.
 - The proposed pipeline routes.
 - The proposed Water Recycling Plant and associated pumping stations.
 - The proposed sites for the Above Ground Plant along the pipeline route.
 - The process undertaken to develop the Project up to this consultation.
 - The preliminary environmental and other impacts of the Project and initial proposals for mitigation.
- 4.1.2 The Applicant undertook an eight-week statutory consultation on the Project, which was in line with sections 42, 45, 46, 47 and 48 of the Planning Act 2008. The statutory Summer 2024 Consultation took place between 29 May 2024 and 23 July 2024.

4.2 Delivery of the 2024 Statement of Community Consultation and the statutory Summer 2024 Consultation

- 4.2.1 The purpose of the 2024 Statement of Community Consultation (2024 SoCC) is to set out how the Applicant would consult with the local community likely to be affected by the Project at the statutory Summer 2024 Consultation. The 2024 SoCC has been used by the Applicant as a reference at subsequent statutory consultations. The 2024 SoCC set out when the consultation would be held, the information to be included in the consultation, who would be consulted, and the approach and tools that would be used to reach consultees and gather their views. The 2024 SoCC fully complied with the statutory requirements and government guidance on pre-application consultations for DCOs.
- 4.2.2 Section 47(2) of the Planning Act 2008 states that *'before preparing the statement, the applicant must consult each local authority that is within section 43(1) about what is to be in the statement'*. Prior to the statutory consultation on the draft 2024 SoCC, the relevant Section 43(1) local authorities in relation to the Project, were invited via email to provide initial advance comments on the draft 2024 SoCC.
- 4.2.3 The local authorities are as follows:
- East Hampshire District Council
 - Eastleigh Borough Council
 - Fareham Borough Council
 - Hampshire County Council

- Havant Borough Council
- Portsmouth City Council
- Winchester City Council.

4.2.4 The timeline below details how the 2024 SoCC was delivered, including the consultation on the 2024 SoCC with local authorities and when it was finalised and made available to view. Local authority comments on the draft 2024 SoCC and regard had to these comments will be reported in the Consultation Report submitted with the DCO application.

Table 4-1 SoCC delivery timetable

Description	Date	Detail
Start of initial advance consultation on the draft 2024 SoCC	16 February 2024	Draft 2024 SoCC issued to local authorities, but including South Downs National Park on a non-prescribed basis for initial advance comment.
End of initial advance consultation on the draft 2024 SoCC	1 March 2024	Feedback from the initial advance consultation incorporated into the draft 2024 SoCC. Examples included publishing the Section 48 notice in the Hampshire Independent newspaper, providing clarity on what consultees would be able to comment on, and updating the proposed deposit locations.
Start of statutory consultation on the draft 2024 SoCC	13 March 2024	Statutory consultation with local authorities starts on the draft 2024 SoCC.
Re-start of statutory consultation on the draft 2024 SoCC	21 March 2024	Statutory consultation restarted with local authorities due to the Applicant making amends to the draft 2024 SoCC regarding what the Applicant was consulting on. Local authorities were given at least 28 days to comment.
East Hampshire District Council's statutory consultation period	16 April 2024	East Hampshire District Council had been omitted from the statutory consultation period in error. The Council was informed that it would have a full 28 days to provide feedback with a deadline of 15 May 2024.

Description	Date	Detail
End of statutory consultation on the draft 2024 SoCC	19 April 2024	End of statutory consultation on the draft 2024 SoCC for all local authorities (other than East Hampshire District Council). Feedback provided to the Applicant.
End of statutory consultation for East Hampshire District Council	15 May 2024	End of statutory consultation for East Hampshire District Council. Feedback received on 30 April 2024.
The Applicant finalised the 2024 SoCC	15 May 2024	The Applicant incorporated feedback following the statutory consultation and finalises the document. Examples of changes made to the 2024 SoCC as a result of local authority feedback included adding an explanation of why the Long Sea Outfall was not included in a Consultation Zone, and including businesses in the description of relevant Consultation Zones.
Publication of the 2024 SoCC notice in local newspapers	27 May and 30 May 2024	2024 SoCC Section 47 Notice published in the below local newspapers: The News (Portsmouth) Southern Daily Echo Hampshire Chronicle
Final 2024 SoCC made available	29 May 2024	Final 2024 SoCC made available at deposit locations and the dedicated consultation website.

4.2.5 **Table 4-2** outlines the Applicant’s conformity with the 2024 SoCC. This is a list of the commitments in the 2024 SoCC and how the Applicant has met the commitment and complied with Sections 42, 47 and 48 of the Planning Act 2008 through the delivery of the statutory Summer 2024 Consultation.

Table 4-2 SoCC compliance and statutory Summer 2024 Consultation delivery

Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
1 - Introduction	Paragraph 2	<i>‘This Statement of Community Consultation (SoCC) describes how we intend to carry out our statutory consultation for the Project. The statutory consultation, to run from 29 May to 23 July 2024, is an important stage of the pre-application process providing an opportunity to raise further awareness and help shape the Project prior to the submission of an application for a Development Consent Order (DCO).’</i>	As per the requirements of the Planning Act 2008, the Applicant confirms that it held a statutory public consultation on its proposals for the Project from 29 May 2024 to 23 July 2024.
	Paragraph 4	<i>‘The Applicant has consulted with and had regard to comments from the following local authorities whilst developing the SoCC:</i> <ul style="list-style-type: none"> • <i>Winchester City Council</i> • <i>Eastleigh Borough Council</i> • <i>Fareham Borough Council</i> • <i>Portsmouth City Council</i> • <i>East Hampshire District Council</i> • <i>Hampshire County Council</i> • <i>Havant Borough Council.</i> 	Please refer to table 4-1 . The Applicant allowed at least 28 days for local authorities and SDNPA to provide comments on the draft 2024 SoCC.

Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
3 - Planning process	Paragraph 2	<i>'The Project is currently at the pre- application stage of the DCO process where we have a duty to, and actively want to, consult on our proposals. After the consultation is completed and having taken into account the views raised during consultation, we will refine our proposals and submit our DCO application to the Secretary of State. When submitted, the Planning Inspectorate on behalf of the Secretary of State will decide if the Project can proceed to the examination.'</i>	The Applicant confirms that it has had regard to all feedback received at the statutory Summer 2024 Consultation. This will be demonstrated through the Consultation Report and associated appendices submitted with the DCO application. Please refer to table 4-3 for summaries of how consultation feedback is shaping the DCO application.
6 - What we will consult on	Paragraph 1	<i>'Following the Summer 2022 Consultation, we have had regard to the feedback received to select our proposed pipeline routes and locations for the above ground plant. We now want to know what stakeholders think about the following to enable the proposals to be further shaped and refined:</i> <ul style="list-style-type: none"> • <i>The Project overall</i> • <i>The proposed pipeline routes</i> • <i>The proposed water recycling plant and associated pumping stations</i> 	The Applicant confirms that the statutory Summer 2024 Consultation feedback form sought views on all of the topics identified in the 2024 SoCC. Additionally, the feedback form included free text areas for respondents to provide comments on any topics where a specific question was not asked. Free text responses to the statutory Summer 2024 Consultation were also accepted via email and by post, providing a

Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
		<ul style="list-style-type: none"> • <i>Proposed above ground plant along the pipeline route</i> • <i>The process undertaken to develop the Project up to this consultation</i> • <i>The preliminary environmental and other impacts of the Project and initial proposals for mitigation.</i> <p><i>'We will also provide information that helps explain the need for the project and the use of water recycling in providing a new source of water.'</i></p>	<p>further opportunity for respondents to comment on all aspects of the Project.</p>
7 - Who we will consult	Paragraph 1 and Figure 3 Consultation Zones	<p><i>'In consultation with the host local authorities, and in accordance with Section 47 of the Planning Act 2008, we have developed the following consultation zones, shown in Figure 3 below, to engage with the local communities who may be affected by the Project.'</i></p>	<p>The Applicant confirms that four consultation zones were developed for the statutory consultation stage.</p> <ul style="list-style-type: none"> • Consultation Zone A: comprised of affected landowners, tenants and businesses within the draft Order Limits • Consultation Zone B: comprised of businesses and people living within 1km of the draft Order Limits • Consultation Zone C: comprised of businesses and people living within 5km of the draft

Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
	Paragraph 3	<p><i>'We will also consult with Statutory Consultees under the Planning Act 2008 and relevant legislation and other relevant stakeholder groups.'</i></p>	<ul style="list-style-type: none"> • Consultation Zone D: included Hampshire and the wider area <p>The Applicant confirms that Section 42(1)(a), (aa), (b) and (d) consultees were initially issued the consultation documents by way of Royal Mail Tracked Delivery which allowed for tracking of packages and proof of delivery. The initial postal issue of consultation letters was dispatched on 23 May 2024, ahead of the start of the statutory Summer 2024 Consultation. In addition to postal copies, the Applicant also notified the majority of consultees where appropriate email addresses were available in the public domain on 29 May 2024.</p> <p>Where delivery couldn't be confirmed by the tracking service for Section 42(1)(a), (aa), and (b) consultees, the Applicant sent a further letter on 18 June 2024 where an alternative address was available. Where an alternative address was not available, an email had been previously sent. Where an alternative email was not available, these letters were then hand delivered.</p>

Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
			<p>Section 42(1)(c) requires consultation with the Greater London Authority. The Project is not within the Greater London and therefore the Applicant did not consult the Greater London Authority.</p> <p>The Applicant can confirm that all known Section 42(1)(d) consultees notifications were verified to be delivered by Royal Mail Tracked Delivery service ahead of the start of the consultation.</p> <p>The Applicant omitted some prescribed consultees, as set out in Schedule 1 of Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 as amended. This was corrected at the statutory Spring 2025 Consultation.</p> <p>Letters and emails sent to Section 42 consultees included the deadline by which consultation responses needed to be submitted to the Applicant of 23 July 2024 and a copy of the Section 48 notice. Examples of the correspondence sent, along with a full list of Section 42 consultees, will be provided in the</p>

Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
			<p>Consultation Report submitted with the DCO application.</p> <p>Pursuant to Section 46 of the Planning Act 2008, the Planning Inspectorate was notified by email on 24 May 2024, before the statutory Summer 2024 Consultation commenced, about the consultation.</p>
8 - How we will consult	Table outlining the method, detail, and Consultation Zone	<i>'Letters will be sent to landowners, tenants and businesses within the draft Order Limits, with information about the Project, the consultation, and how to find out more and provide feedback.'</i>	The Applicant confirms that letters with the prescribed information were sent to addresses which included residents, landowners, tenants, and businesses in Consultation Zone A on 23 May 2024 to provide information about the Project and the consultation.
	Table outlining the method, detail, and Consultation Zone	<i>'A leaflet summarising the Project, the consultation, and how to find out more and provide feedback will be sent.'</i>	The Applicant confirms that leaflets in the committed form were distributed within the specified Consultation Zones A and B.
	Table outlining the method, detail, and	<i>'Posters will be distributed with details of the Project, the consultation events, and how to find out more and provide feedback.'</i>	Posters with details of the Project and consultation events were displayed in Consultation Zones A, B and C to raise awareness of the consultation. Locations

Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
	Consultation Zone		were identified using online mapping services in conjunction with the draft Order Limits, ensuring that posters would reach communities likely to be affected by the Project.
	Table outlining the method, detail, and Consultation Zone	<i>‘Advertisements in the Hampshire Chronicle, Hampshire Independent, Portsmouth News, and Southern Daily Echo, to notify of the consultation and provide details of consultation events and how to find out more and provide feedback.’</i>	<p>Section 47 Planning Act 2008 notices A notice relating to where and when the published 2024 SoCC was available to be viewed was published in the following:</p> <ul style="list-style-type: none"> • On 27 May 2024 in The News (Portsmouth) • On 27 May 2024 in the Southern Daily Echo • On 30 May 2024 in the Hampshire Chronicle <p>Section 48 Planning Act 2008 notices A Section 48 notice was published in four local newspapers for two consecutive weeks, once in a national newspaper and once in the London Gazette. These local newspapers:</p> <ul style="list-style-type: none"> • The News (Portsmouth) published on 22 May and 31 May 2024.

Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
			<ul style="list-style-type: none"> • Southern Daily Echo published on 22 May and 31 May 2024. • Hampshire Chronicle published on 23 and 30 May 2024. • Hampshire Independent published on 24 and 31 May 2024. • The London Gazette published on 29 May 2024 • The Times published on 5 June 2024 <p>Copies of Section 47 and Section 48 notices will be included in the Consultation Report which will be submitted with the DCO submission.</p>
	Table outlining the method, detail, and Consultation Zone	<i>‘We will be using paid promotion and our own social media channels. Materials for social media will be produced and distributed to selected stakeholders who would be willing to help publicise the Project.’</i>	The Applicant publicised details of the statutory Summer 2024 Consultation, including reminders of the timing of the consultation, via the Applicant’s Facebook and Instagram accounts. The Applicant also used targeted adverts. The adverts provided a link to the website for the Project.
	Table outlining the method and detail to	<i>‘We will contribute to stakeholder briefings (including local authority and parish councils) held prior to the launch of the consultation to advise them of the</i>	The Applicant received the following requests from stakeholders to contribute to briefings about the consultation. On 12 June 2024, the Applicant held an online

Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
	reach beyond the specific consultation zones.	<i>consultation and how they can find out more and provide feedback. Stakeholders will also be advised of the Applicant’s social media campaign and information on how to interact with its posts.’</i>	stakeholder briefing with Havant Borough Council. The Applicant also held an online stakeholder briefing with councillors from Havant Borough Council to provide new councillors with an introduction to the Project and the consultation on the 17 June 2024. No further requests were received by the Applicant.
	Table outlining the method and detail to reach beyond the specific consultation zones.	<i>‘Notices will be posted on or near land that is identified as unknown owner.’</i>	Site notices were printed on waterproof paper and erected in publicly accessible areas nearest to the relevant unregistered parcel to ensure the highest visibility to the public. These were erected, monitored and replaced bi-weekly over an 8-week period starting 28 May 2024 and ending 26 July 2024.
	Table outlining the method and detail to reach beyond the specific	<i>‘We will send an email to all registered users of the Water for Life – Hampshire website and respondents to the previous consultation that wished to stay in touch. This will signpost to key information and will include a link to the consultation website,</i>	An email was sent to members of the wider community who had previously provided email contact details and expressed an interest to be kept informed about updates regarding the Project. The email included details of the statutory Summer 2024 Consultation and how to take part.

Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
	consultation zones.	<i>details of the consultation events, and how to find out more and provide feedback.'</i>	
	Table outlining the method and detail to reach beyond the specific consultation zones.	<i>'A Project website will be the digital hub for the consultation and will include the consultation materials, options to feedback virtually and to request further information or accessible versions of consultation.'</i>	The Applicant developed a dedicated consultation website which also hosted an interactive map. Users could search their postcode and view on the map how the Project may impact them. All consultation documents were available to view/download within the document library. The documents were in PDF format which facilitated online viewing and downloads. The website also hosted an online feedback form which was situated on the home page for easy access. In addition, the website had a side bar which adapted the website based on accessibility requirements.
	Table outlining the method and detail to reach beyond the specific consultation zones.	<i>'The consultation brochure, feedback form and technical information pack will be available for people to view at deposit locations in local and regional hubs.'</i>	The statutory Summer 2024 Consultation documents which included all the committed elements were available for inspection, with some materials available to take away, at the below locations, from 29 May to 23 July 2024.

Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
			<ul style="list-style-type: none"> • Bishop’s Waltham Library, Free Street, Bishop’s Waltham, Southampton, SO32 1EE • Cosham Library, Spur Road, Cosham, Portsmouth, PO6 3EB • Eastleigh Library, 1 Swan Centre, Eastleigh, SO50 5SF • Fair Oak Community Library, Campbell Way, Fair Oak, Eastleigh, SO50 7AX • Fareham Library, Osborn Road, Fareham, PO16 7EN • Havant Library, Havant Meridian Centre, Havant, PO9 1UN • Leigh Park Library, 50 Park Parade, Leigh Park, Havant, PO9 1UN • Paulsgrove Library, Paulsgrove Youth Community Centre, Marsden Road, Portsmouth, PO6 4JB • Waterlooville Library, The Precinct, Waterlooville, PO7 7DT
	Table outlining the method and	<i>‘We will run a series of six public consultation events to provide information on the consultation and give people the</i>	The Applicant confirms that it held six consultation events to provide information on the consultation including the

Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
	<p>detail to reach beyond the specific consultation zones.</p>	<p><i>opportunity to talk to the Project team. These will include exhibition boards describing the Project and members of the Project Team will be on-hand to answer questions. Visitors will be encouraged to ask questions to aid their understanding, complete/take away feedback forms and the consultation brochure.'</i></p>	<p>consultation brochure, make feedback forms available and give people an opportunity to talk to the Project team with details below:</p> <ul style="list-style-type: none"> • From 2pm to 8pm on Monday 10 June 2024 at Havant Rugby Football Club, Hooks Lane Ground, Fraser Road, Havant, PO9 3EJ. 110 persons attended. • From 10am to 4pm on Saturday 15 June 2024 at Meridian Shopping Centre, Elm Lane, Havant. PO9 1UN. 285 persons attended. • From 2pm to 8pm on 20 June 2024 at Southwick D-Day Memorial Hall, Priory Road, Southwick. PO17 6ED. 42 persons attended. • From 10am to 4pm on 22 June 2024 at Jubilee Hall, Little Shore Lane, Bishops Waltham. SO32 1ED. 80 persons attended. • From 2pm to 8pm on 27 June 2024 at Colden Common Community Centre, Saint Vigor Way, Colden Common. SO21 1UU. 138 persons attended. • From 2pm to 8pm on 28 June 2024 at Wickham Community Centre, Mill Lane,

Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
			Wickham. PO17 5AL. 114 persons attended.
	Table outlining the method and detail to reach beyond the specific consultation zones.	<i>‘Within the consultation period, we will offer to present at meetings where local organisations already meet and a request is made (for example but not limited to parish councils, community groups, education establishments, businesses, recreational groups, non-government organisations, seldom heard and hard to reach groups). Where required and feasible we may combine requests for briefings. For those that would like a session with us please email HampshireWTWRP@southernwater.co.uk’</i>	<p>The Applicant confirms that it held an online stakeholder briefing with Havant Borough Council on 12 June 2024. Havant Borough Council were the only local organisation that requested a briefing, despite all local authorities being offered.</p> <p>The Applicant also held an online stakeholder briefing with councillors from Havant Borough Council to provide new councillors with an introduction to the Project and the consultation on 17 June 2025.</p> <p>The Applicant did not receive any requests for a briefing via the dedicated consultation inbox.</p>
	Consultation documents	<i>‘To ensure accessibility (including seldom heard and hard to reach groups), on request, documents can also be translated, made available in large print, audio versions, braille and in a digital data format. In addition, hard copies of consultation documents can be provided. Please see</i>	Before the consultation launched, the Applicant consulted a supplier who could produce the consultation materials in an accessible format on request. For example, documents could be translated, made available in large print, audio version, and braille. The Applicant received no requests

Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
		<p><i>contact us section for our contact details to request these methods.'</i></p>	<p>via its freephone or inboxes for alternative formats during the consultation but was prepared to do so, if any request had come in.</p> <p>A range of approaches and media to maximise awareness of the Project and the consultation were used. These were designed to allow people with different needs across the community to take part in the consultation in a way that was accessible and convenient for them.</p> <p>In addition, the Applicant noted in its consultation brochure that those who required additional support to attend the public consultation events could contact the Applicant ahead of any of these events to make specific arrangements to attend or whilst they were in attendance at the events, if required. The Applicant affirmed that while it would make every possible effort to accommodate additional support, it may not have been possible for all. However, no requests were made that the Applicant was not able to accommodate.</p>

Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
			<p>The consultation brochure outlined accessibility features, also described in the Equality Impact Assessment to be submitted with the DCO application, for each of the consultation venues so the wider community could pick a venue which met their accessibility requirements.</p>
	<p>Consultation materials</p>	<p><i>‘One copy of the consultation brochure and feedback form is free. We are keen to reduce the impact on the environment by reducing unnecessary printing and minimising paper use. The Preliminary Environmental Information Report is around 6,000 pages.’</i></p>	<p>The Applicant confirms that copies of the feedback form, alongside other consultation materials, were available at consultation events and deposit locations to take away free of charge.</p> <p>The Applicant also noted in its Consultation Brochure that anyone could request a copy of the brochure, or any other consultation materials, in alternative formats free of charge by contacting the Applicant directly.</p>
	<p>Consultation documents</p>	<p><i>‘The following consultation documents (together with other supporting material) will be available for viewing online, at deposit locations and at the public consultation events free of charge during the consultation:’</i></p>	<p>The Applicant confirms that all consultation materials were produced with print copies available to view free of charge at deposit locations throughout the consultation, and at events. The consultation brochure and the feedback form could be taken away or one copy could be sent per household in the</p>

Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
		<p>Consultation brochure – a plain English and visually accessible booklet that provides the key information about the proposals, the consultation and how to get involved.</p> <p>Feedback form – a survey designed to collect feedback on the proposals</p> <p>Frequently Asked Questions – a document answering a range of questions about the Project serving as a one-stop reference point for concerns and providing signposts to further information should it be required</p> <p>SoCC – this document</p> <p>Preliminary Environmental Information Report – report to enable consultees (both specialist and non-specialist) to understand the likely environmental effects of the Project that have been identified on a preliminary basis</p> <p>Preliminary Environmental Information Report Non-Technical Summary – a summary of the Preliminary Environmental Information Report</p> <p>2024 Scheme Development Summary – a summary of how the Project has developed</p>	<p>post upon request. All materials were available online.</p> <p>The opening hours for eight of the deposit locations were corrected in the 2024 SoCC, both on the online and hard copy versions held at the deposit locations on 13 June 2024.</p> <p>During the consultation, the Applicant was made aware that the appendices for Chapter 20 of the PEI Report had been incorrectly uploaded to the consultation website. These were Appendix 20.1 (Longlist and shortlist of other developments) and Appendix 20.2 (Cumulative effects assessment). They were uploaded correctly on 10 June 2024 to the consultation website and rectified at deposit locations on 18 June and 19 June 2024.</p> <p>The figures to Appendix 11.1 (Geotechnical and Geo-Environmental Desk Study) of the PEI Report were missing from the consultation website. This appendix was uploaded on 18 June 2024 and corrected at deposit locations.</p>

Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
		<i>to date, including refinements made following the Summer 2022 Consultation Book of Plans – plans of the proposed pipeline routes and above ground plant.'</i>	An update was made to the consultation brochure about Environment Agency Licensing. A revised consultation brochure was uploaded to the website on 26 June 2024 and a clarification note added on 28 June 2024. Question 3 in the Frequently Asked Questions was about the Applicant's agreement with the Environment Agency. This document was therefore also updated to provide clarity on 4 July 2025. Hard copies at deposit locations were updated on 5 July 2024.
10. How the community can provide comments	Second section	<i>'The following official feedback mechanisms will be provided as part of the consultation: Online feedback form Email FREEPOST address QR code to website'</i>	The Applicant confirms that feedback was accepted via the channels outlined in the 2024 SoCC within the statutory consultation period.
11. How we will respond to feedback	Paragraph 1	<i>'Once the consultation has closed, we will collate and analyse the responses received. We will carefully consider all issues raised and will have regard to this feedback when finalising the proposed application.'</i>	The Applicant confirms that all consultation responses provided in the consultation period were collated and analysed. Consideration has been given to these responses following the close of the statutory consultation and the Applicant will

Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
			<p>have regard to feedback as per Section 49 of the Planning Act 2008. As a result of this feedback, along with the results of technical and environmental assessments, and ongoing evolution of the Project, the Applicant subsequently made 25 design refinements.</p> <p>The Applicant held a further supplementary consultation with updated water quality information and the 25 design refinements.</p>
	Paragraph 2	<p><i>‘As part of the DCO application we will publish a Consultation Report, detailing how we have engaged and consulted on the Project, whilst adhering to legislation and guidance and reporting on the issues raised in the consultation and our response to them. In having regard to feedback and refining our proposals, it may be necessary to make further changes to the proposed Project following the statutory consultation process.’</i></p>	<p>The Applicant confirms that the Consultation Report will be available on the Planning Inspectorate’s website once the application for development consent has been submitted and accepted. The Consultation Report will set out how the Applicant has had regard to feedback in accordance with Section 49 of the Planning Act 2008.</p>
	Paragraph 3	<p><i>‘Any comments received will be analysed by the Applicant and any of its appointed agents. Copies may be made available in</i></p>	<p>The Applicant confirms that feedback will be analysed and summarised in the form of issue statements where feedback has been</p>

Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
		<p><i>due course to the Secretary of State, the Planning Inspectorate and other relevant statutory authorities so that your responses can be considered as part of the development of the Project.</i></p> <p><i>Your personal details will not be placed on public record except where this is required in accordance with legislation or legal duty such as land referencing, but will be held securely by the Applicant and its appointed agents in accordance with the General Data Protection Regulation (GDPR), the Planning Inspectorate’s Customer Privacy Notice 8 and the Data Protection Act 2018. Personal details will be used solely in connection with the consenting and regulatory processes, except as noted above, or in accordance with any legal requirements or process, and will not be passed to third parties.’</i></p>	<p>paraphrased. It is also confirmed that no personal information will be included within the Consultation Report, which will be submitted with the DCO application. The Applicant is compliant with guidance on data protection as listed in the 2024 SoCC.</p>

4.3 Consideration of feedback

4.3.1 A total of 985 relevant responses were submitted to the Applicant, this included 597 feedback forms, 385 emails and 3 letters. That number includes responses received after the deadline, which were accepted by the Applicant on a discretionary basis, with the latest being the 26 July 2024. **Graphic 4-1** outlines the key statistics from the statutory Summer 2024 Consultation.

Graphic 4-2 Statistics from the statutory Summer 2024 Consultation



Event	Attendees
Monday 10 June Havant Rugby Football Club, Hooks Lane Ground, Fraser Road, Havant, Hampshire, PO9 3EJ	110
Saturday 15 June Meridian Shopping Centre, Elm Lane, Havant, PO9 1UN	285
Thursday 20 June Southwick D-Day Memorial Hall, Priory Road, Southwick, PO17 6ED	42
Saturday 22 June Jubilee Hall, Little Shore Lane, Bishop's Waltham, SO32 1ED	80
Thursday 27 June Colden Common Community Centre, Saint Vigor Way, Colden Common, SO21 1UU	138
Friday 28 June Wickham Community Centre, Mill Lane, Wickham, PO17 5AL	114



Age Group	16-24	25-34	35-44	45-54	55-64	65-74	75 or over	Prefer not to say	
Female	1	4	22	27	32	37	16	8	45.7%
Male		10	14	20	38	37	25	7	46.9%
Other		2	1	1	1	1		3	2.8%
Prefer not to say		1	1	2	1	3		7	4.7%
	0.3%	5.3%	11.8%	15.5%	22.4%	24.2%	12.7%	7.8%	

4.3.2 **Table 4-3** below provides a summary of the feedback themes that have been identified throughout the statutory Summer 2024 Consultation and how these responses are shaping the Applicant's final proposals.

Table 4-3 Summary of issues raised at statutory Summer 2024 Consultation and how they are shaping the application

Issue raised at consultation	How consultation responses are shaping the application
<p>The Applicant received feedback regarding potential impacts on the environment resulting from both construction and operation of the Project.</p>	<p>Construction and operational impacts are something that the Applicant is considering throughout each stage of the Project and will therefore be reported on in all topic chapters of the Environmental Statement. Consultation feedback continues to result in the Applicant making refinements to the Project and how it is constructed, such as through changes to the pipeline routes to avoid environmental features, and to measures contained in the Outline Construction Environmental Management Plan (CEMP) which seeks to avoid, reduce and mitigate construction impacts.</p> <p>Since the statutory Summer 2024 Consultation, the Applicant has produced an Outline Operational Management Plan and Outline Landscape and Ecological Management Plan which aim to avoid, reduce and reduce impacts during operation.</p>
<p>The Applicant received feedback suggesting that the Project was an unsustainable option to build and operate in terms of energy.</p>	<p>The Applicant has confirmed that the Options Appraisal Process carried out in 2021 confirmed the Project as the most sustainable solution and that the Project continues to be selected in the Applicant's final draft WRMP24 as the only feasible solution to address the water supply challenge in Hampshire. The energy use of the Project was considered in the Options Appraisal Process.</p> <p>Various strategies, assessments and management plans detailed as part of the DCO will consider how the Project can be developed and delivered as sustainably as reasonably practicable.</p>
<p>The Applicant received feedback surrounding the potential health impacts of drinking recycled water.</p>	<p>The Applicant continues to provide assurance around the efficacy of the water recycling process and the fact that water going into supply will continue to meet strict regulatory standards on drinking water quality. These standards are regulated and overseen by the Drinking Water Inspectorate. The Applicant</p>

Issue raised at consultation	How consultation responses are shaping the application
	has also undertaken engagement with relevant stakeholders as part of the Water Recycling Pilot Plant, with a particular focus on those based in the Havant area, and carried out a subsequent consultation on environmental water quality, feedback from which continues to inform the development of the Applicant's assessments and mitigation.
The Applicant received feedback about the Above Ground Plant due to potential negative environmental effects.	In developing the Project design, the Applicant has sought to reduce the potential impacts of Above Ground Plant, with design refinements made and presented as part of the statutory Spring 2025 Consultation. Solutions to address this feedback are in the form of landscape screening and planting, for example to reduce potential landscape and visual impacts. These will all be reported on in the Design Principles Document to be submitted with the DCO application. The Applicant has carried out extensive engagement with local authorities on the emerging design principles that will be set out in this document.
The Applicant received feedback about the prolonged negative effects of construction traffic on transport, for example congestion.	Throughout Project development, the Applicant has looked to avoid and reduce construction traffic impacts, for example by using trenchless crossings for main roads and reducing use of roads for the pipeline route. The Applicant has also confirmed that various measures will be proposed through the DCO process to control construction traffic operations in order to further reduce potential impacts on the road network and road users. Outline traffic management plans are also being prepared that will accompany the DCO application.
The Applicant received feedback around the noise and vibration impacts of construction and operation.	The Applicant acknowledges this feedback surrounding noise and vibration from construction and operation and continues to refine the pipeline route and Above Ground Plant works to avoid and reduce noise and vibration impacts, with management plans

Issue raised at consultation	How consultation responses are shaping the application
	being developed to further control potential impacts through construction and operation.
<p>The Applicant received feedback noting that the narrow nature of some roads could restrict the flow of traffic, particularly if construction vehicles are unable to pass in locations such as Portchester Lane, White Dell Lane, and Scivier's Lane.</p>	<p>Where there are narrow roads that are not wide enough for two HGVs to pass, the Applicant has added measures to the Outline Construction Traffic Management Plan to ensure that deliveries would be coordinated to avoid a scenario where two HGVs would need to pass. In relation to the identified locations, construction compound access proposals have been refined so that HGVs would not need to route along those narrow roads. Instead, the relevant construction compounds would be accessed via the haul road and appropriate or wider roads on the local highway network.</p>
<p>The Applicant received feedback around the possible disturbance to local wildlife and environmentally sensitive areas.</p>	<p>The Applicant has sought to avoid and reduce impacts on biodiversity throughout the development of the Project. The Applicant continues to, where practicable, avoid ancient woodland, designated sites and known ecological features. Feedback has also informed the use of trenchless crossings and reduced working width locations during construction and the subsequent development of appropriate measures in management plans that will be submitted as part of the DCO application.</p>
<p>The Applicant received feedback around possible disturbance to the historic and cultural environment.</p>	<p>Since the statutory Summer 2024 Consultation, the design principles of Above Ground Plant and Environmental Mitigation and Enhancement Areas have been further developed with respect to heritage assets. An Outline Written Scheme of Investigation relevant to archaeological remains and geoarchaeological deposits has also been further developed. The assessment is being carried out in line with appropriate good practice professional guidance. Where likely significant effects are being identified, the Applicant is looking for ways to avoid or reduce them. Where mitigation is required, the Applicant is developing an Outline Written</p>

Issue raised at consultation	How consultation responses are shaping the application
	<p>Scheme of Investigation and has engaged with Historic England, Winchester County Council and Hampshire County Council on this.</p>
<p>The Applicant received feedback about the effects of air quality and odour from the Project and existing infrastructure.</p>	<p>The Applicant acknowledges this feedback surrounding air quality and odour, which will be comprehensively assessed in Environmental Statement Chapter 6 Air Quality and Odour. Regarding the methodology for the air quality assessment, the Applicant originally proposed to use the Joint Nature Conservation Committee approach (and used this for the PEI Report). Following comments from Natural England during the statutory Summer 2024 Consultation, the Applicant updated the air quality assessment approach and is using Natural England's NEA001 guidance.</p> <p>The Outline CEMP will contain measures to reduce emissions of dust and odour during construction activities, as well as exhaust pollutants from Non-Road Mobile Machinery and road vehicles, including proposed emissions standards for construction road vehicles. Air quality and odour impacts are not expected to occur during the operational phase of the Project.</p>
<p>The Applicant received feedback regarding the level of detail of the environmental assessments.</p>	<p>The Environmental Impact Assessment (EIA) process for projects consented under the Planning Act 2008, such as the Project, follow a process whereby the environmental information and assessment develops as the design evolves. The PEI Report, published as part of the statutory Summer 2024 Consultation materials, provided the preliminary environmental information and the potential likely significant effects based on the information at that point in time. Following the statutory Summer 2024 Consultation, additional work has been undertaken on collecting and updating baseline and survey data, modelling, and refining the environmental assessments. This work has</p>

Issue raised at consultation	How consultation responses are shaping the application
	<p>been used to inform not only the assessment of likely significant effects that will be presented in the Environmental Statement, but also the ongoing iterative refinement of the Project design.</p>
<p>The Applicant received feedback around the Project implications in terms of carbon emissions and climate change.</p>	<p>Since the statutory Summer 2024 Consultation, the Applicant has developed and prepared the Outline Carbon Management Plan which will set out measures being embedded into the Project to reduce carbon. The Outline Carbon Management Plan will be submitted as part of the DCO application.</p>
<p>The Applicant received feedback about the water quality at Havant Thicket Reservoir when used to store the recycled water.</p>	<p>The Applicant acknowledges this feedback and undertook additional engagement as part of the statutory Spring 2025 Consultation on environmental water quality to update and seek feedback on its latest water quality modelling work. The Applicant continues to have regard to this and subsequent feedback as it finalises its assessments and mitigation proposals, which will be reported in the Environmental Statement.</p>
<p>The Applicant received feedback surrounding possible malfunctions at the Water Recycling Plant and how it would affect the water quality in Havant Thicket Reservoir.</p>	<p>The Applicant has sought to provide assurances that appropriate measures and controls would be put in place to prevent possible malfunctions of the treatment process impacting on the reservoir and wider environment. The multi-stage water recycling process will feature numerous safeguards, including continuous monitoring, to ensure that significant deviations in expected water quality can be quickly spotted and rectified through partial or full system shutdowns. It will not be possible for treated wastewater to bypass this process and enter Havant Thicket Reservoir. These safeguards will be implemented by the Contractor appointed to construct and operate the Water Recycling Plant and will be a key specification for the plant to ensure water quality requirements will be met.</p>

Issue raised at consultation	How consultation responses are shaping the application
<p>The Applicant received feedback around the Project possibly resulting in changes to the quality of releases from the existing Eastney Long Sea Outfall and therefore affecting coastal waters.</p>	<p>The Applicant recognises this feedback surrounding water quality from releases from the Long Sea Outfall. Updated environmental information, supplementary to that presented in the PEI Report, was presented as part of the Applicant's statutory Spring 2025 Consultation. This included more detailed quantitative information to reflect the latest environmental water quality modelling work. This confirmed that water quality impacts are not expected from releases from the Long Sea Outfall as a result of the Project.</p>
<p>The Applicant received feedback from landowners around impacts to farming and the land that would be disrupted during building and operation.</p>	<p>Ongoing Project design development has looked to refine the pipeline route to reduce impacts on land use and agriculture. There is also ongoing engagement with landowners to better understand the extent and nature of land holdings, scale and seasonality of agricultural operations. No farm viability issues are currently envisaged that will not be resolved through ongoing discussion.</p>
<p>The Applicant received feedback from landowners around the proposed 40-metre width of the working corridor needed for pipeline installation.</p>	<p>The Applicant has made clear that a 40 metre working width is necessary for the open-cut construction of the pipeline, but in response to feedback, has investigated where the working width can be reduced to 20 metres, where possible in limited circumstances, to address environmental and other constraints.</p>
<p>The Applicant received feedback regarding access to the working corridor and how it would be managed in order to minimise impacts and ensure security is maintained.</p>	<p>The Applicant has confirmed that crossing points and site accesses would be locked to maintain safety and security during the construction process. Further measures will be detailed in the various management plans that will support the DCO to control activities during the construction process in order to reduce impacts.</p>
<p>The Applicant received feedback around the use of chemicals in the water recycling process and controls needing to be put in place to ensure no contaminated water enters Havant Thicket</p>	<p>The Applicant outlined at the statutory Summer 2024 Consultation that chemicals would be used and stored as part the Project, specifically for the water recycling process, and that the use and storage of chemicals</p>

Issue raised at consultation	How consultation responses are shaping the application
<p>Reservoir. The feedback was as a result of scepticism around the proposed use of water recycling technology in the UK.</p>	<p>would meet relevant safety and regulatory requirements as necessary.</p> <p>The Applicant has also sought to provide assurance around the quality of the recycled water entering Havant Thicket Reservoir by consulting on updated water quality assessment work in Spring 2025, noting that water quality would be required to meet relevant regulations as part of the consenting process but also standards specified by the Environment Agency as part of a discharge permit for the reservoir.</p> <p>The multi-stage water recycling process will also feature numerous safeguards, including continuous monitoring, to ensure that significant deviations in expected water quality can be quickly spotted and rectified through partial or full system shutdowns. It will not be possible for treated wastewater to bypass this process and enter the reservoir. These safeguards will be implemented by the Contractor appointed to construct and operate the Water Recycling Plant and will be a key specification for the plant to ensure water quality requirements will be met.</p>
<p>The Applicant received feedback from landowners who were affected by the proposed pipeline routes.</p>	<p>As well as the ongoing landowner engagement, the Applicant consulted on a preferred pipeline corridor in non-statutory Summer 2022 Consultation and proposed pipeline routes at statutory Summer 2024 Consultation, together with further design refinements in the statutory Spring 2025 Consultation. Throughout the development of the Project, the Applicant has taken landowner feedback on board and, where reasonably practicable, adjusted the design of the Project to address issues raised.</p>
<p>The Applicant received feedback around wanting more information on how excavated landfill waste would be dealt with, the proposed measures to prevent potential</p>	<p>The Applicant is confident that appropriate construction methods and practices will be employed for effective handling of landfill waste and construction within the historic landfill.</p>

Issue raised at consultation	How consultation responses are shaping the application
<p>disturbance of contamination within the landfill at the proposed Water Recycling Plant site (Site 72), and the responsibility for dealing with any potential contamination.</p>	<p>Engagement continues with Havant Borough Council and the Environment Agency to ensure that risks and significant likely impacts are avoided or reduced with appropriate controls put in place.</p>
<p>The Applicant received feedback around the cost to the customer to build and operate the Project.</p>	<p>The Applicant has made clear throughout its consultations that the Options Appraisal Process undertaken in 2021 to select the Project confirmed it as the most sustainable and best value solution and that the project continues to be selected in the Applicant's final draft WRMP24 for delivery at the earliest opportunity. The development and progression of this Project has been overseen and supported by the Applicant's regulators.</p>
<p>The Applicant received feedback about consultees feeling misled about the plans for Havant Thicket Reservoir and its intended use.</p>	<p>The Applicant affirms that it has always been open and transparent about the options it has considered to address the water supply deficit in Hampshire, including the use of Havant Thicket Reservoir. The options to utilise Havant Thicket Reservoir were communicated at the time the planning application for Havant Thicket Reservoir was being considered and during the Applicant's non-statutory Public Consultation in 2021.</p>
<p>The Applicant received feedback about how much water is currently lost to leaks, which according to consultees would resolve the shortfall.</p>	<p>Leakage is a challenge across the water industry, and the Applicant is one of the better performing companies with regards to its leakage performance, committing to reduce leakage by 53% by 2025.</p> <p>Given the size of the water supply shortfall faced in Hampshire, finding and fixing all leaks across the county, and the rest of the Applicant's supply area, would only provide around half of the water needed and not within the timescale required. The Applicant has always been clear that reducing leakage is an important part of reducing the shortfall as part of a suite of solutions, including the development of large new sources of water, such as this Project.</p>

Issue raised at consultation	How consultation responses are shaping the application
The Applicant received feedback around alternatives to water recycling like rainwater capture.	After developing and consulting on WRMP19 and the final draft WRMP24, the Applicant continues to outline that alternatives like rainwater capture simply are not enough to cover the shortfall that is needed to address the water supply shortfall in Hampshire.

4.4 Summary

- 4.4.1 On 28 January 2025, the Applicant published a Summer 2024 Consultation Summary of Feedback Report which provides a summary of the consultation activities, an overview of the main themes that emerged from the consultation responses, and an explanation of how the Applicant had been considering the issues raised in the development of the Project.
- 4.4.2 The Applicant is actively addressing the feedback by continuing to refine the pipeline routes to reduce disruption and avoid sensitive areas, and is committed to developing design principles in collaboration with local authorities to ensure good design. Changes to the design of the Project arose in response to consultation feedback, but also from on-going technical work and environmental surveys. The Applicant consulted on several of these design refinements at the statutory Spring 2025 Consultation.
- 4.4.3 The use of Havant Thicket Reservoir for the storage of recycled water was one of the most commented on themes. This prompted the decision to consult on updated water quality information as part of the statutory Spring 2025 Consultation.

5 Statutory Spring 2025 Consultation

5.1 Approach

- 5.1.1 At the statutory Summer 2024 Consultation, the Applicant explained that extensive water quality modelling was being undertaken and that the outputs of the modelling and assessment of effects would be fully reported in the Environmental Statement with the DCO application. The Applicant subsequently took the opportunity to consult on the progress of this modelling and assessment work, alongside a number of design refinements, as part of its statutory Spring 2025 Consultation.
- 5.1.2 Specifically, our statutory Spring 2025 Consultation focused on:
- Predicted water quality impacts on the Havant Thicket Reservoir, connected downstream water bodies (including Riders Lane Stream, Hermitage Stream, and Langstone Harbour), and the Solent.
 - Proposed refinements to the design of the Project that take into account feedback from the statutory Summer 2024 Consultation and on-going project development and stakeholder engagement.
- 5.1.3 The Applicant drafted an ‘Approach to Consultation’ document. The purpose of this document was to set out how and when the consultation would be held, the information that would be included in the consultation, who would be consulted, and the approach and tools that would be used to reach consultees and gather views. A further SoCC was not required because the 2024 SoCC published at statutory Summer 2024 Consultation stated *‘If we deem a significant change is made to the Project as a whole, or new statutory consultees are affected, we will consider further targeted and proportionate consultation beyond what is specified in this document, to help inform the final design of the Project. If further consultation is carried out, we will provide appropriate notification to relevant stakeholders who may be affected by the change(s) in question.’*
- 5.1.4 Although not a statutory requirement, the Applicant consulted on the proposed approach with local authorities as set out in the Approach to Consultation prior to the launch of statutory Spring 2025 Consultation.
- 5.1.5 The timeline in **table 5-1** below details how the Approach to Consultation document was delivered, including the consultation on the Approach to Consultation document with local authorities and South Downs National Park Authority (SDNPA), and when the document was finalised and made available to view.

Table 5-1 Approach to Consultation delivery timetable

Description	Date	Detail
Start of consultation on the draft Approach to Consultation	18 February 2025	Draft Approach to Consultation document issued to local authorities consulted on the 2024 SoCC, and SDNPA for comment. Feedback was requested by 25 February 2025.

Description	Date	Detail
document with local authorities		
Joint Officer Group Meeting at the end of consultation on the draft Approach to Consultation document with local authorities	25 February 2025	The Applicant further briefed local authorities and SDNPA on the approach in a Joint Officer Group Meeting. Feedback on the approach was received verbally, and in writing via email.
Finalised Approach to Consultation document shared with local authorities	3 March 2025	Queries made during the consultation by local authorities were answered in a Microsoft Excel tracker by the Applicant. The only queries were the request for a possible consultation period extension, commenting on the risk of not holding any in-person events and whether the consultation documents would be available to local authorities and SDNPA before launch. As all questions were answered in the tracker to the satisfaction of the local authorities, no changes to the Applicant's approach to the consultation were required. The Applicant distributed the finalised Approach to Consultation document to the local authorities and SDNPA, outlining that the document would be published alongside the other consultation documents at consultation launch on the 5 March 2025 at https://www.hampshirewtwrp.co.uk
Publication of Approach to Consultation document	5 March 2025	The Approach to Consultation document was uploaded, alongside other consultation materials, to the Applicant's consultation website.

5.2 Delivery of the Statutory Spring 2025 Consultation

- 5.2.1 The Applicant undertook a four-week, statutory consultation on the Project, which was in line with Sections 42, 45, 46, 47 and 48 of the Planning Act 2008. The statutory Spring 2025 Consultation took place between 5 March 2025 and 4 April 2025.
- 5.2.2 **Table 5-2** outlines the Applicant's conformity with the Approach to Consultation. This is a list of the commitments made in the Approach to Consultation and how the Applicant has met the commitment and complied with Sections 42, 47 and 48 of the Planning Act 2008.

Table 5-2 Approach to Consultation compliance

Section of Approach to Consultation document	Paragraph of Approach to Consultation document	Commitment as set out in the Approach to Consultation document	How the Applicant has fulfilled the commitment
2 – Spring 2025 Consultation	Paragraph 1	<i>‘Responses to consultation will then be used to inform ongoing development and assessment of the Project as it progresses along the consenting timetable.’</i>	The Applicant confirms that regard will be had to all feedback received at the statutory Spring 2025 Consultation. This will be demonstrated through the Consultation Report and associated appendices submitted with the DCO application.
2.1 – Who we will consult	Paragraph 1	<p><i>‘We have developed the Spring 2025 Consultation zones to engage with the local communities who may be affected by the Project. The Spring 2025 Consultation zones are:</i></p> <ul style="list-style-type: none"> <i>• ‘Zone A – Draft Order Limits (dOL)</i> <i>• ‘Zone B – Generally 250m from the dOL</i> <i>• ‘Zone C – 5km from dOL</i> <i>• ‘Zone D – Hampshire and the wider area (with an emphasis on the south and coastal region)’</i> 	<p>The Applicant confirms that four consultation zones were developed for the statutory consultation stage.</p> <ul style="list-style-type: none"> • Consultation Zone A: comprised of affected landowners, tenants and businesses within the dOL • Consultation Zone B: comprised of businesses and people living within 250m of the dOL • Consultation Zone C: comprised of businesses and people living within 5km of the dOL • Consultation Zone D: included Hampshire and the wider area

Section of Approach to Consultation document	Paragraph of Approach to Consultation document	Commitment as set out in the Approach to Consultation document	How the Applicant has fulfilled the commitment
	Paragraph 2	<i>'In accordance with the SoCC, we will also consult with Statutory Consultees under the Planning Act 2008 and relevant legislation and other relevant stakeholder groups.'</i>	<p>The Applicant confirms that Section 42(1)(a), (aa), (b) and (d) consultees were initially issued the consultation documents by way of Royal Mail Tracked Delivery which allowed for tracking of packages and proof of delivery. The initial postal issue of consultation letters was dispatched on 27 February 2025, ahead of the start of the statutory Spring 2025 Consultation. In addition to postal copies, the Applicant also notified the majority of consultees where appropriate email addresses were available in the public domain on 4 March 2025.</p> <p>Where delivery couldn't be confirmed by the tracking service for Section 42(1)(a), (aa), and (b) consultees, the Applicant sent a further letter on 5 March 2025. Where delivery could not be confirmed a second time, the Applicant further emailed requesting the consultee to confirm the notification had been delivered but received no confirmation. Where an alternative email was not available, these letters were then hand delivered.</p>

Section of Approach to Consultation document	Paragraph of Approach to Consultation document	Commitment as set out in the Approach to Consultation document	How the Applicant has fulfilled the commitment
			<p>The Applicant can confirm that all known Section 42(1) (d) consultee notifications were verified to be delivered by Royal Mail Tracked Delivery service ahead of the start of the consultation.</p> <p>At the statutory Summer 2024 Consultation, the Applicant omitted some prescribed consultees, as set out in Schedule 1 of Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 as amended. This was corrected at the statutory Spring 2025 Consultation where the Applicant consulted these consultees on both the statutory Summer 2024 Consultation, and the statutory Spring 2025 Consultation. Consultees were given at least 28 days to comment.</p> <p>Letters and emails sent to Section 42 consultees included the deadline by which consultation responses needed to be submitted to the Applicant of 4 April 2025 and a copy of the Section 48 notice. Examples of the correspondence sent,</p>

Section of Approach to Consultation document	Paragraph of Approach to Consultation document	Commitment as set out in the Approach to Consultation document	How the Applicant has fulfilled the commitment
			<p>along with a full list of Section 42 consultees, will be provided in the Consultation Report submitted with the DCO application.</p> <p>Pursuant to Section 46 of the Planning Act 2008, the Planning Inspectorate was notified by email on 5 March 2025 about the statutory Spring 2025 Consultation.</p>
2.2 – How we will consult	Paragraph 1	<i>‘The Spring 2025 Consultation will be a “digital first” consultation meaning that the consultation information will be available to view online.’</i>	The Applicant confirms that all the information was made available on its consultation website on 5 March 2025 in the document library at https://www.hampshirewtwrp.co.uk/index.html
2.2 – How we will consult	Table outlining the method, detail, and Consultation Zone	<i>‘Letters will be sent to landowners, tenants and businesses within the draft Order Limits, with information about the Project, the consultation, how to find out more and how to provide feedback.’</i>	The Applicant confirms that letters were sent to addresses which included residents, landowners, tenants, and businesses in Consultation Zone A on 26 February 2025 to inform of the consultation.
	Table outlining the method, detail, and	<i>‘Notices will be posted on or near land within the draft Order Limits that is identified as unknown owner.’</i>	Site notices were printed on waterproof paper and erected in publicly accessible areas nearest to the relevant unregistered

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	Consultation Zone		parcel to ensure the highest visibility to the public. These were erected, monitored and replaced weekly over a 6-week period starting 27 February 2025 and ending 07 April 2025.
	Table outlining the method, detail, and Consultation Zone	<i>'Postcards will be sent to all properties with postcodes broadly within a 250m buffer of the dOLs with information about the Project, the consultation, how to find out more and how to provide feedback.'</i>	The Applicant confirms that postcards with information about the Project, the consultation, how to find out more and how to provide feedback were sent on 27 February 2025 to properties and businesses in Consultation Zones A and B.
	Table outlining the method, detail, and Consultation Zone	<i>'Posters will be distributed both digitally to some for their own issuing and physically where this cannot happen. These posters will contain details of the consultation, and to find out more and how to provide feedback. We will distribute these to the external border of consultation Zone C which covers a 5km radius of the pipeline. We will aim to distribute over 100 posters to places like community hotspots, points of interest for seldom-heard groups and green</i>	Posters were displayed in Consultation Zones A, B and C to raise awareness of the consultation. Locations were identified using online mapping services in conjunction with the draft Order Limits, ensuring that posters would reach communities likely to be affected by the Project. The Applicant distributed approximately 50 posters.

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		<i>spaces in order to achieve good consultation promotion.'</i>	
	Table outlining the method, detail, and Consultation Zone	<i>'Advertisements in the Hampshire Chronicle, Southern Daily Echo, and The News (Portsmouth), to notify of the consultation and provide details of how to find out more and provide feedback.'</i>	<p>The Applicant confirms that adverts were published by the three local newspapers, reaching all four Consultation Zones.</p> <ul style="list-style-type: none"> • The Hampshire Chronicle published on 6 March and 13 March 2025 • The Southampton Southern Echo published on 5 March and 12 March 2025 • The News (Portsmouth) published on 5 March and 12 March 2025
	Table outlining the method, detail, and Consultation Zone	<i>'We will be promoting the consultation on social media channels.'</i>	The Applicant publicised details of the statutory Spring 2025 Consultation, including reminders of the timing of the consultation, via the Applicant's Facebook and Instagram accounts. The adverts provided a link to the website for the Project. This social media reached all four Consultation Zones
	Table outlining the method, detail, and	<i>'Notices as required under Section 48 of the Planning Act 2008, in the Hampshire Chronicle, The Times, The London Gazette, The News</i>	The Applicant confirms that all Section 48 notices were published by the recorded outlets, reaching all four Consultation Zones.

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	Consultation Zone	<i>(Portsmouth) and the Hampshire Independent to notify of the consultation and provide details of how to find out more and provide feedback.'</i>	<ul style="list-style-type: none"> • The Hampshire Chronicle published on 20 and 27 February 2025. • The Times published on 4 March 2025. • The London Gazette published on 4 March 2025. • The News (Portsmouth) published on 25 February and 4 March 2025. • The Hampshire Independent published on the 28 February 2025. <p>Copies of these Section 48 notices will be included in the Consultation Report which will be submitted with the DCO submission.</p>
	Table outline Method and Detail	<i>'Emails (or letters where requested) will be sent to all prescribed and non-prescribed consultees, and members of the public that filled in keep in touch cards with full contact details at both the Summer 2022 Consultation and Summer 2024 Consultation and wanted to be kept in touch about the Project. These will be sent to capture</i>	<p>Notifications were sent to prescribed and non-prescribed stakeholders where appropriate email addresses were available within the public domain.</p> <p>All emails were sent from the dedicated inbox 'hampshirewtwrp@southernwater.co.uk'.</p> <p>An email was also sent to members of the wider community who had previously</p>

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		<i>wider areas beyond the specific consultation zones.'</i>	expressed an interest to be kept informed about updates regarding the Project.
	Table outline Method and Detail	<i>'A Project website will be the digital hub for Spring 2025 Consultation and will include the Consultation information and materials, and options to request further information or accessible print versions of consultation materials. www.HampshireWTWRP.co.uk'</i>	The Applicant updated its dedicated consultation website. The website hosted an online feedback form which was situated on the home page for easy access. Consultation documents were available to view and download within the document library. The documents were in PDF format which facilitated online viewing and downloads. Other parts of the website were updated to reflect the new and previous consultations. Some places did request physical copies of the materials being sent to them and the Applicant did so.
	2.2.1 Consultation Materials	<i>'The following information will be available for viewing online during the consultation:</i> <ul style="list-style-type: none"> 'Consultation Information document – including an introduction to the consultation, a summary of the updated water 	The Applicant confirms that all consultation materials were available to view online. Physical copies of the feedback form were also available, free of charge, upon request. The Applicant was made aware of three typographical errors in the consultation

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		<p><i>quality information, information sheets (containing before and after plans plus a description of the change) relating to each of the proposed design refinements, any new Frequently Asked Questions along with information on how to comment and provide feedback. This information will be presented on the website but will be available in printed format.</i></p> <ul style="list-style-type: none"> • ‘Water Quality Report – a report summarising the updated water quality information, including a non-technical executive summary of the Report’s findings. • ‘Feedback form – a simple survey designed to collect feedback on the proposals. • ‘Approach to Consultation – this document. It describes how we intend to carry out the Spring 2025 Consultation for the Project. 	<p>material. On 12 March 2025, the Applicant updated the website and the online document library, and included a clarification note. No requests were made by seldom heard groups for accessibility related enquiries.</p>

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		<p><i>'To ensure accessibility (including seldom heard groups), on request, documents can also be translated, made available in large print, audio versions, braille and in a digital data format. As the Spring 2025 Consultation is to be 'digital first' we won't be holding any in-person events or be providing any deposit locations. We believe this is a proportionate approach given that the Project as a whole has not fundamentally changed. However, people can contact us to ask questions about the Spring 2025 Consultation and, in addition, hard copies of consultation material can sent, free of charge, to consultees if requested.'</i></p>	
2.3 – When we will consult	Paragraph 1	<p><i>'The Spring 2025 Consultation will be carried out over a 30-day period from 5 March 2025 until 4 April 2025. Prior to this there will be a two-week pre-awareness period (from 19 February 2025), during which time posters will</i></p>	<p>As per the requirements of the Planning Act 2008, the Applicant confirms that it held a statutory public consultation on updated water quality information and 25 proposed design refinements for the Project from 5 March to 4 April 2025. The Applicant can also confirm that posters, notices and other</p>

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		<i>be distributed, notices published, and content promoted on social media.'</i>	content was published within the pre-awareness period as detailed previously in this table.
2.4 – How the community can provide comments.	Paragraph 2	<p><i>'In accordance with the SoCC, the following official feedback mechanisms will be provided as part of the consultation:</i></p> <ul style="list-style-type: none"> • <i>'Email comments to: FeedbackHWTWRP@southernwater.co.uk</i> • <i>'Letters: FREEPOST HAMPSHIRE WTWRP CONSULTATION</i> • <i>'Feedback form, located on the website www.HampshireWTWRP.co.uk'</i> 	The Applicant confirms that feedback was accepted via the channels outlined in the Approach to Consultation document.
2.5 – How we will respond to consultation feedback	Paragraph 1	<i>'As outlined in the SoCC, once the consultation has closed, we will collate and analyse the responses received. We will carefully consider all issues raised and will have regard to this feedback when finalising our Development Consent Order application. As part of the application,</i>	The Applicant confirms that regard will be had to feedback as per Section 49 of the Planning Act 2008. As part of the DCO application, the Applicant will publish a Consultation Report, detailing how they have engaged and consulted on the Project, whilst adhering to legislation and guidance

Section of Approach to Consultation document	Paragraph of Approach to Consultation document	Commitment as set out in the Approach to Consultation document	How the Applicant has fulfilled the commitment
		<p><i>we will publish a Consultation Report, detailing how we have engaged and consulted on the Project, whilst adhering to legislation and guidance and reporting on the issues raised in the consultation and our response to them.'</i></p>	<p>and reporting on the issues raised in the consultation and our response to them.</p>
	<p>Paragraph 3</p>	<p><i>'Any comments received by way of the prescribed methods to the consultation by the deadline may be made available in due course to the Secretary of State, the Planning Inspectorate, appointed Examining Authority, and other relevant statutory authorities so that feedback can be considered as part of the application process. We will ensure that any personal details are not placed on public record, except where it is required in accordance with legislation or legal duty such as land referencing but held securely in accordance with the General Data Protection Regulation (GDPR), the Planning Inspectorate's Customer Privacy</i></p>	<p>The Applicant confirms that feedback will be summarised in the form of issue statements where feedback will be paraphrased. No personal information will be included within these statements. The Applicant is compliant with guidance on data protection as listed in the 2024 SoCC.</p>

Section of Approach to Consultation document	Paragraph of Approach to Consultation document	Commitment as set out in the Approach to Consultation document	How the Applicant has fulfilled the commitment
		<i>Notice4 and the Data Protection Act 2018. Personal details will be used solely in connection with the consultation process and preparation of and subsequent DCO application.'</i>	
3 – Contact Us	Paragraph 1	<p><i>'If you have any queries or questions about the Project, including requests for hard copies of any of the consultation documents, or any particular accessibility needs, please contact us at:</i></p> <ul style="list-style-type: none"> • <i>'Email: HampshireWTWRP@southernwater.co.uk</i> • <i>'Post: FREEPOST HAMPSHIRE WTWRP CONSULTATION</i> • <i>'Phone: 0800 254 5138'</i> 	The Applicant confirms that these channels were provided and monitored.

5.3 Consideration of feedback

- 5.3.1 A total of 219 responses to the consultation were received, this included 2 letters via the freepost address, 125 online feedback forms, and 92 emails.
- 5.3.2 **Table 5-3** below provides a summary of the feedback themes that have been identified throughout the statutory Spring 2025 Consultation and how these responses are shaping the Applicant’s proposals. Full details of how the Applicant has had regard to the feedback received during the non-statutory and statutory consultation periods will be provided in the Consultation Report submitted as part of the DCO application.

Table 5-3 Summary of issues raised at statutory Spring 2025 Consultation and how they are shaping the application

Issues raised at consultation	How consultation responses are shaping the application
<p>The Applicant received feedback challenging the findings presented in the Environmental Water Quality Report, specifically the outcomes of the water quality modelling. Concerns were raised regarding the conclusion that significant adverse impacts on Riders Lane Stream, Hermitage Stream, Langstone Harbour and the Solent are unlikely.</p>	<p>The Applicant remains confident in its modelling and assessment work that no likely significant effects are anticipated.</p> <p>Assessments are being finalised to form part of the Environmental Statement alongside ongoing engagement with the Environment Agency, Natural England and Portsmouth Water.</p> <p>An Environmental Permit, regulated by the Environment Agency, will be required for the release of recycled water into Havant Thicket Reservoir and for the release of reject water from the Water Recycling Plant to the Solent. The Applicant will apply for this permit in parallel to the DCO process.</p>
<p>The Applicant received feedback about impacts of traffic and transport from construction on the local road network.</p>	<p>Impacts on the road network has been a key issue raised and addressed throughout the development of the Project. The Applicant continues to consider feedback alongside engagement with the relevant highway authorities to reduce impacts from construction traffic.</p> <p>The Applicant is also continuing to develop traffic management plans to further control and mitigate traffic impacts which will be submitted as part of the DCO application.</p>

Issues raised at consultation	How consultation responses are shaping the application
<p>The Applicant received feedback surrounding the water quality modelling not going far enough or meeting the correct parameters.</p>	<p>Water quality modelling undertaken by the Applicant adheres to the Environment Agency's Surface Water Pollution Risk Assessment process which involves screening a defined suite of parameters to determine if any have the potential to fail its Environmental Quality Standard (EQS) and therefore require further assessment (modelling). If the EQS screening shows predicted concentrations in the reject water to be below the EQS for a parameter, it is screened out and modelling is not required. The EQSs are set out in the Water Framework Directive (Standards and Classification) Directions (England and Wales) 2015, which are strict levels that seek to prevent environmental impacts and includes a comprehensive suite of chemicals. Some chemicals do not have an EQS, in which case it is not possible to assess them against any scientific or regulatory criteria. The modelling approach has been agreed with the Environment Agency. Details of the EQS screening and water quality modelling will be outlined in the Chapter 19 of the Environmental Statement.</p>
<p>The Applicant received feedback around the expectation of a fully detailed Environmental Statement at DCO submission.</p>	<p>The Applicant would like to provide reassurance that a fully detailed Environmental Statement will be submitted as part of the DCO application.</p>
<p>The Applicant received feedback about the possible negative impacts on water quality and nutrients in Havant Thicket Reservoir.</p>	<p>The Applicant outlined in its water quality modelling and assessment work as part of its statutory Spring 2025 Consultation that, subject to appropriate mitigation, no significant effects are anticipated within Havant Thicket Reservoir as a result of storing recycled water. The environmental water quality assessments continue to be refined and will be fully reported in the Environmental Statement, together with a Nutrient Assessment, as part of the DCO application.</p> <p>The Applicant will apply for an Environmental Permit to release recycled water into Havant</p>

Issues raised at consultation	How consultation responses are shaping the application
	Thicket Reservoir. The Environment Agency will stipulate the water quality requirements of the recycled water.
<p>The Applicant received feedback about the need for pollution prevention should there be errors in any stage of the build or operation of the Project.</p>	<p>The Applicant has sought to provide assurances that appropriate measures and controls would be put in place to prevent possible malfunctions of the treatment process impacting on the environment. The multi-stage water recycling process will feature numerous safeguards, including continuous monitoring, to ensure that significant deviations in expected water quality can be quickly spotted and rectified through partial or full system shutdowns. It will not be possible for treated wastewater to bypass this process and enter Havant Thicket Reservoir. These safeguards will be implemented by the Contractor appointed to construct and operate the Water Recycling Plant and will be a key specification for the plant to ensure water quality requirements will be met.</p> <p>Pollution prevention will additionally be controlled through the construction of the project through both the project's design and how it is delivered. Various management plans, including an outline Construction Environmental Management Plan, are being developed to ensure that best practice measures and controls are employed throughout the construction phase to reduce impacts, including pollution prevention. These will be set out within the Applicant's DCO application.</p>
<p>The Applicant received feedback surrounding pharmaceuticals being released into the water environment post-water recycling process.</p>	<p>The Applicant has sought to provide assurances around the efficacy of the water recycling process in removing impurities and compounds before the recycled water is pumped into Havant Thicket Reservoir. In addition, the Applicant has made clear that reject water from the water recycling process (containing impurities removed from the treated wastewater) would be released to the Solent, alongside treated wastewater from Budds Farm</p>

Issues raised at consultation	How consultation responses are shaping the application
	<p>Wastewater Treatment Works. The predicted water quality of this combined release has been assessed against a list of compounds with an EQS provided by the Environment Agency for discharges into the environment. Twelve pharmaceutical and personal care product compounds were assessed and passed the Environment Agency's H1 screening assessment, confirming that concentrations of these compounds are not predicted to have any significant impact on the environment.</p>
<p>The Applicant received feedback about phosphorus removal from the water.</p>	<p>The Applicant acknowledges that it's assessment work presented in its statutory Spring 2025 Consultation highlighted increased levels of phosphorus in Havant Thicket Reservoir as a result of recycled water, but remains confident that this can be reduced through additional treatment at the Water Recycling Plant in order to mitigate any potential effects. This will be further detailed and reported on in the Environmental Statement.</p> <p>The Environmental Permit required for the release of recycled water into Havant Thicket Reservoir will stipulate the water quality requirements that need to be achieved and the Applicant is working closely with the Environment Agency to progress this permit.</p>
<p>The Applicant received feedback about the effect of compensatory flows on marine and freshwater biodiversity, and wildlife at Havant Thicket Reservoir, Riders Lane Stream, Hermitage Stream and Langstone Harbour.</p>	<p>The modelling and assessment work presented at the statutory Spring 2025 Consultation confirmed that, subject to phosphorus mitigation, there were no likely significant effects anticipated on biodiversity. This work is currently being finalised and will be fully reported in the Environmental Statement as part of the DCO application.</p>
<p>The Applicant received feedback about the possibility of algal blooms forming in Havant Thicket Reservoir.</p>	<p>The modelling and assessment work undertaken to date and shared at statutory Spring 2025 Consultation has shown an increased level of phosphorus in the recycled water. The Applicant has proposed to reduce</p>

Issues raised at consultation	How consultation responses are shaping the application
	this through additional treatment at the water recycling plant in order to reduce the increased potential for algal blooms in Havant Thicket Reservoir. This will be further detailed and reported on in the Environmental Statement.
The Applicant received feedback about the effects of noise and vibrations caused by construction and operation of the Project to structures and humans.	The Noise and Vibration assessment, which will be included in the Environmental Statement, will present an assessment of the effects caused by the construction and operation of the Project on noise and vibration. This work has built on the assessment presented in the Preliminary Environmental Information Report, provided as part of the statutory Summer 2024 Consultation. To mitigate the potential noise and vibration effects, both an Outline Construction Environmental Management Plan (CEMP) and Outline Operational Management Plan have been developed to include relevant measures. Specifically for construction, the Outline CEMP requires that a Noise and Vibration Management Plan be prepared prior to works commencing, and includes a minimum set of management and monitoring processes to be followed.
The Applicant received feedback about the energy use and carbon emissions that the Project could emit.	The energy use of the Project was considered in the Options Appraisal Process carried out in 2021. This confirmed the Project as the most sustainable solution. Since statutory Summer 2024 Consultation, the Applicant has developed and prepared the Outline Carbon Management Plan which will set out measures being embedded into the Project to reduce carbon. The Outline Carbon Management Plan will be submitted as part of the DCO application.
The Applicant received feedback about cumulative effects of the Project.	The Applicant has carefully considered the cumulative effects of the Project alongside other relevant developments. This includes through engagement with all local authorities and highway authorities to consider the methodology for considering other relevant

Issues raised at consultation	How consultation responses are shaping the application
	<p>developments and agreeing the lists of developments. These lists have been updated since statutory Summer 2024 Consultation and will be reported in the Environmental Statement Chapter 20 Cumulative and in-combination effects.</p>
<p>The Applicant received feedback about the potential impacts of construction on Public Rights of Way (PRoWs).</p>	<p>The Applicant acknowledges the feedback and minimising impacts on PRoWs has been a consideration throughout the Project development process. The Applicant has engaged closely with relevant local authorities and highway authorities, such as Hampshire County Council and South Downs National Park Authority, to address concerns raised. This feedback continues to inform not only the Applicant’s Environmental Statement but also its Framework Rights of Way Management Plan.</p>
<p>The Applicant received feedback around the use of agricultural land for the Project and its impact on landowners.</p>	<p>Engagement with landowners has been ongoing throughout Project development to reduce impacts on agricultural land and many design refinements have been made and consulted on in this respect through the statutory Spring 2025 Consultation and subsequent statutory Autumn 2025 Targeted Consultation.</p>
<p>The Applicant received feedback about impacts to access to recreational grounds during the construction phase.</p>	<p>The Applicant acknowledges this feedback surrounding access to recreation grounds and has considered this through the Project development process and sought to reduce impacts on existing access.</p> <p>Access and amenity impacts on recreational grounds will be considered in Chapter 12 of the Environmental Statement. Health impacts on users of green spaces will be considered within Chapter 17 of the Environmental Statement. Both of these chapters will be submitted as part of the Environmental Statement with the DCO application.</p>

Issues raised at consultation	How consultation responses are shaping the application
<p>The Applicant received feedback about the proposed working hours and the disruption these could cause.</p>	<p>The Applicant has acknowledged that construction work is likely to cause disturbance in some locations and has made significant efforts to locate works away from residential properties to avoid and reduce any impacts. But notwithstanding that, an Outline CEMP will provide provision for the Noise and Vibration Management Plan which is to be prepared by the appointed Contractor. The appointed Contractor is to also apply working hour restrictions as additional mitigation if pre-construction assessments show this to be required.</p>
<p>The Applicant received feedback about the logistics of crossing rivers with pipelines.</p>	<p>Information regarding the proposed construction methodology has been a key focus of the pre-application consultation process. This topic has been discussed in detail through technical working groups held with the Environment Agency and other bodies, ensuring that relevant stakeholders are informed and can influence the approach.</p>
<p>The Applicant received feedback about how the waste from the water recycling process would be disposed of.</p>	<p>The Applicant has confirmed through its consultations that reject water from the water recycling process would be pumped back to Budds Farm Water Treatment Works, prior to release via the existing Eastney Long Sea Outfall. It is worth noting however that this waste is in liquid form, rather than sludge. This will continue to be detailed as part of the DCO application.</p>
<p>The Applicant received feedback about the implications of possible pipeline bursts.</p>	<p>The Applicant has designed the Project to ensure that the probability of a pipeline bursting is extremely low. Nonetheless, the Applicant set out in its statutory Summer 2024 Consultation how major accidents and disasters would be managed, and this will again be set out as part of the DCO application in the Environmental Statement. This will detail that a legal easement over strips of land either side of, and above and below, the entire alignment of the pipeline would be required to restrict certain activities that could adversely affect the infrastructure.</p>

Issues raised at consultation	How consultation responses are shaping the application
	<p>These activities include prevention of piling or percussive activities, prevention of building a wall or structure (unless easily removed), and anything that could endanger the pipe and cause a leak. The Applicant will aim to secure the necessary legal easements by working with landowners.</p> <p>Isolation valves would be installed on the pipeline to reduce flooding in the unlikely event of a burst, and a design principle for safety, security and emergency is proposed to be set out in the Design Principles Document.</p> <p>Further mitigation for the risk of flooding and pipe leaks during the operation of the Project will be detailed in the Outline Operational Management Plan. This includes the formation of an incident team and its operation and de-escalation. These measures will further help to reduce potential flooding from a pipe burst.</p>
<p>The Applicant received feedback about the operation of the Water Recycling Plant's technology.</p>	<p>The Water Recycling Plant will be operated and maintained by an appointed Contractor. They will be undertaking proactive maintenance throughout the lifetime of the Project to ensure the Water Recycling Plant is working and operating smoothly.</p>
<p>The Applicant received feedback about security and surveillance of Havant Thicket Reservoir.</p>	<p>The Applicant notes that the construction and operation of Havant Thicket Reservoir is a matter for Portsmouth Water, as it is responsible for delivering Havant Thicket Reservoir.</p>
<p>The Applicant received negative feedback about the design and visual impact of Above Ground Plant.</p>	<p>The design of the Project is a key matter for the Applicant, and it is in the process of developing and agreeing design principles with local authorities to ensure the design of the Above Ground Plant is appropriate to its setting and reduces visual impacts. Feedback on the Above Ground Plant continues to be considered as the outline design for the DCO application is finalised.</p>

Issues raised at consultation	How consultation responses are shaping the application
The Applicant received feedback about the acceptability of drinking recycled water.	The Applicant continues to provide assurance around the efficacy of the water recycling process and the fact that water going into supply will continue to meet strict regulatory standards on drinking water quality.
The Applicant received feedback from landowners about security and access to properties during the construction phase.	This feedback has been acknowledged, and the Applicant has confirmed that crossing points and site accesses would be locked to maintain safety and security during the construction process. Further measures will be detailed in the various management plans that will support the DCO application to control activities during the construction process in order to reduce impacts.
The Applicant received feedback about the options appraisal for alternatives to water recycling not being robust enough.	The Applicant has made clear throughout its consultations that the Options Appraisal Process undertaken in 2021 to select the Project confirmed it as the most sustainable and best value solution and that the project continues to be selected in the Applicant's final draft WRMP24 for delivery at the earliest opportunity. The development and progression of the Project has been overseen and supported by the Applicant's regulators.
The Applicant received feedback around the mixing of recycled and spring water.	The Applicant acknowledges this feedback, however it has made clear that the proposed use of Havant Thicket Reservoir for storing recycled water remains a key part of the proposal which is embedded in the need for the Project. The Applicant has sought to provide reassurance around the efficacy of the water recycling process and additional information on environmental water quality was presented in the statutory Spring 2025 Consultation. Using recycled water to help fill Havant Thicket Reservoir also provides resilience to the reservoir during drought.
The Applicant received feedback about the lack of incorporation of feedback surrounding design elements	The Applicant has had regard to all feedback from its statutory Summer 2024 Consultation and has reflected this in the development and design of the Project where reasonably

Issues raised at consultation	How consultation responses are shaping the application
<p>of the Project from the statutory Summer 2024 Consultation.</p>	<p>practicable and feasible, including for example multiple amendments to the pipeline route to avoid and reduce impacts on landowner interests. This collaborative approach has helped shape a more responsive and considerate proposal. Through the non-statutory Summer 2022 Consultation and statutory Summer 2024 Consultation, the Applicant has broadly set out how it is considering feedback received. This has been explained through summary and feedback reports published on the consultation website. In addition to these reports, the Applicant has detailed how the design of the Project has evolved through its Scheme Development Summary reports. Further information on how the design of the Project has been influenced by consultation feedback will be included in the Consultation Report which will be submitted as part of the DCO application.</p>
<p>The Applicant received feedback surrounding the cost to the customer of the Project.</p>	<p>The Applicant has made clear throughout its consultations that the Options Appraisal Process undertaken in 2021 to select the Project confirmed it as the most sustainable and best value solution and that the Project continues to be selected in the Applicant's final draft WRMP24 for delivery at the earliest opportunity. The development and progression of the Project has been overseen and supported by the Applicant's regulators. As with all the Applicant's costs, the funding for new infrastructure, such as the Project, will be averaged across water supply customers' bills and will be subject to approval by the water industry regulator, Ofwat.</p>
<p>The Applicant received negative feedback about the use of Portsmouth Water's pipeline for transporting recycled water, instead of purely water from Bedhampton Springs.</p>	<p>The use of the Portsmouth Water's pipeline for transferring recycled water to Havant Thicket Reservoir can only be achieved through a successful DCO. Using Portsmouth Water's infrastructure means the Applicant does not need to build a separate tunnel at a later date through the urban area of Havant. This delivers overall a better value for money outcome for</p>

Issues raised at consultation	How consultation responses are shaping the application
	customers and a less disruptive outcome for local communities and the environment.
The Applicant received feedback about Design Refinement 3 (Pipeline Sections A and B) and effects on existing infrastructure and natural assets.	The backup tunnel proposal through Havant is no longer part of the Project following the consenting of Portsmouth Water’s pipelines. The Applicant is working closely with Portsmouth Water on the interface of the two projects and continues to ensure that impacts of the Project on other infrastructure and the environment are avoided and reduced where reasonably practicable.
The Applicant received feedback from asset owners about future cooperation in the DCO process.	The Applicant is engaging with identified undertakers and asset owners regarding the development of the Project.

5.4 Summary

- 5.4.1 As the Applicant had done so following the statutory Summer 2024 Consultation feedback, it reviewed the feedback received from the statutory Spring 2025 Consultation. This highlighted further amendments to the design which the Applicant then consulted on in the Autumn of 2025. An explanation showing where consultation responses have led to changes to the Project will be included in the Consultation Report, submitted with the DCO application.
- 5.4.2 Feedback on environmental water quality modelling, and freshwater and marine biodiversity assessments are being considered as the Applicant finalises the Environmental Statement which will contain the full assessment of the water quality modelling undertaken by the Applicant and Portsmouth Water. The DCO application will include details of any proposed monitoring and mitigation.

6 Local authority views on ‘Adequacy of Consultation’

6.1 Approach

- 6.1.1 The Applicant chose to actively engage with local authorities to support the AoCM submission.
- 6.1.2 On the 25 February 2025, the Applicant held a Joint Officer Group meeting and explained the purpose and content of the AoCM submission. The Applicant informed local authorities that it would be asking for their views on the compliance of statutory consultations for the Project.
- 6.1.3 At a subsequent Joint Officer Group meeting on 7 May 2025, the Applicant shared a proposed structure and programme for the AoCM submission and explained that they would write to local authorities asking for their comments.
- 6.1.4 A copy of the letter sent to the local authorities on 16 May 2025 can be found in **Appendix A**. The Applicant asked local authorities for their views and any relevant supporting material on the Applicant’s compliance with the following:
- Section 42 Duty to consult
 - Section 47 Duty to consult local authorities
 - Section 48 Duty to publicise
- 6.1.5 The letter was appended with a form to support local authorities with their response. A response was requested by 7 May 2025.
- 6.1.6 In reply, Portsmouth City Council and Havant Borough Council stated that they could not confirm whether the Applicant had complied with Section 48 of the Planning Act 2008. In response, on 12 June 2025, the Applicant emailed the local authorities and provided copies of the published Section 48 notices for both the statutory Summer 2024 Consultation and the statutory Spring 2025 Consultation.
- 6.1.7 On 13 June 2025, Portsmouth City Council requested evidence to confirm that all consultees had been consulted. On 10 July 2025, the Applicant held a meeting with Portsmouth City Council to explain the approach taken to comply with Section 42 of the Planning Act 2008.

6.2 Summary of local authority views

- 6.2.1 The Applicant received responses from all seven local authorities. These can be viewed in **Appendix B**. A summary of the local authority responses in relation to the Applicant’s compliance with the Planning Act 2008 are represented in **table 6-1** below.

Table 6-1 Local authority responses with regards to compliance with the Planning Act 2008

Local authority	Date of response	Assessment of compliance response (Yes/No)		
		Section 42	Section 47	Section 48
East Hampshire District Council	20 May 2025	Yes	Yes	Yes
Eastleigh Borough Council	24 June 2025	Yes	Yes	Yes
Fareham Borough Council	2 June 2025	Yes	Yes	Yes
Hampshire County Council	9 June 2025	Yes	Yes	Yes
Havant Borough Council	17 June 2025	Yes	Yes	Yes
Portsmouth City Council	10 July 2025	Yes	Yes	Yes
Winchester City Council	9 June 2025	Yes	Yes	Yes

7 Next steps

7.1 Further consultation

- 7.1.1 The Applicant held a targeted consultation, the statutory Autumn 2025 Targeted Consultation, on eight further design refinements with landowners and persons with an interest in land in Autumn 2025. The design refinements are minor and localised in nature, and only those with a direct land or property interest associated with the changes were consulted.
- 7.1.2 The Applicant wrote to those that are affected and provided an information sheet that detailed the proposed change to the design, why the design change is proposed and how the change might affect the consultee or the environment. The feedback mechanisms used are the those outlined in the 2024 SoCC.
- 7.1.3 At the close of the statutory Autumn 2025 Targeted Consultation, the Applicant had received two consultation responses which are being reviewed. Full details of how the Applicant will have regard to the feedback received during this consultation will be provided in the Consultation Report submitted as part of the DCO application.

7.2 Ongoing engagement

- 7.2.1 The Applicant will continue to engage with key stakeholders with the purpose of seeking to actively resolve outstanding issues through existing working groups and ongoing dialogue and continue to refine the Project prior to the DCO application. A Statement of Engagement will accompany the DCO application and will detail the pre-application engagement undertaken by the Applicant alongside the consultations for the Project.
- 7.2.2 The Programme Document will be updated on the Applicant's dedicated consultation website as required. In addition, a news section has been added to the consultation website to keep the wider community and stakeholders up to date with latest project news prior to the DCO submission. The Applicant will notify key stakeholders and those that wanted to be informed of any updates when news articles are added to the consultation website.
- 7.2.3 A theme from the feedback the Applicant has received from ongoing engagement and through consultation is the public acceptability of a change in drinking water which uses recycled water as part of its source. Change of source engagement is a specific phase of engagement with all affected customers that is proposed to occur much closer to the change in their drinking water source. The Drinking Water Inspectorate (DWI) has confirmed there are no prescribed engagement requirements so this will be for the Applicant to design and implement, to meet legal and regulatory requirements, working closely with the DWI. Following discussions with the DWI, the Applicant has set out a plan to begin engaging specifically on a change of source two years ahead of recycled water becoming part of a new source of supply. This will be after DCO consent is granted for the Project. This timescale will ensure the messages customers receive are timely and use the most matured

and accurate information available and the most effective channels available at that time.

7.3 Consultation Report

- 7.3.1 The Applicant is continuing to analyse and consider all feedback received during each stage of consultation for the Project to inform the Project and application. The Consultation Report will be prepared and submitted as part of the DCO application, in accordance with section 37(3)(c) of the Planning Act 2008.
- 7.3.2 The Consultation Report will thematically summarise the responses received at the statutory consultations and, in accordance with Section 49 of the Planning Act 2008, report on how regard to the responses received has been given. The Applicant will identify and report where consultation responses have led to changes to the Project.
- 7.3.3 The Applicant will submit a Statement of Engagement with the DCO application. This document will outline the Applicant's engagement with stakeholders and communities, highlighting how outcomes from engagement have shaped the development of the Project.

Appendix A Local authority letter and form



East Hampshire District Council
PO Box 310
Petersfield
GU32 9HN

Date
16 May 2025

Dear 

Hampshire Water Transfer and Water Recycling Project

Adequacy of Consultation Milestone (AoCM)

On 30 April 2024, the government published updated guidance on the pre-application stage for Nationally Significant Infrastructure Projects¹ and introduced the Adequacy of Consultation Milestone (AoCM)². The AoCM allows early consideration of the adequacy of consultation undertaken by project promoters and therefore reduces the risk of this being an issue at the acceptance stage of the Development Consent Order submission. The guidance sets out that the AoCM should:

- be recorded by the applicant and submitted to the Planning Inspectorate as a short statement
- comprise the elements of consultation which have been carried out compared with the components set out in the Programme Document and the SoCC
- include the views and any relevant supporting material from local authorities

We are writing to you to ask for your views to inform and provide any supporting material relevant to the AoCM submission.

About the Project

As a reminder, the Project will transform how we source, treat and supply water across Hampshire. In the face of increasing environmental restrictions, population growth and climate change, the Project will help maintain essential water supplies for customers while taking less water from the environment, protecting the rare and sensitive chalk streams of the River Test and River Itchen.

The Project would use advanced treatment techniques to turn highly treated wastewater, that is usually pumped far out to sea, into purified recycled water at a new water recycling plant in Havant. This purified recycled water would be pumped via an underground pipeline to the Havant Thicket Reservoir where it would mix with spring water. Water from the reservoir would then be pumped along another pipeline to our Otterbourne Water Supply Works where it would be treated to strict drinking water standards before being sent into supply.

The Project has been directed by the Secretary of State as a project of national significance. We are therefore seeking consent for the Project under the Planning Act 2008 and anticipate making an

¹ <https://www.gov.uk/guidance/planning-act-2008-pre-application-stage-for-nationally-significant-infrastructure-projects>

application to the Secretary of State for a Development Consent Order in late 2025. As the Project falls within the threshold set out in Schedule 2 paragraph 10(I) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 2017 Regulations), the Project will require an Environmental Impact Assessment (EIA). Accordingly, we prepared a Preliminary Environmental Information Report (PEI Report) as part of our Summer 2024 Consultation to help you understand the preliminary likely significant environmental effects of our proposals that we identified.

Summary of ongoing engagement

We have sought to engage with stakeholders throughout the development of the Project including outside of the non-statutory and statutory consultation periods. This ongoing engagement has been undertaken through various mechanisms and has sought to keep key stakeholders informed about the progress of the Project, inform the ongoing design of the Project and enable timely discussions on opportunities and outstanding matters for continuing engagement identified.

Summary of non-statutory and statutory consultations on the Project

Date	Consultation activity	Details
8 February to 16 April 2021	Non-statutory Public Consultation 2021	Desalination and alternative options.
5 July to 16 August 2022	Non-statutory Summer 2022 Consultation	Water recycling as a new, sustainable water resource, the location of the proposed water recycling plant, the preferred pipeline corridor, and zones for above ground plant.
16 February to 19 April 2024	Consultation on the Statement of Community Consultation (SoCC)	<p>Informal consultation undertaken with local authorities between 16 February and 1 March 2024. Southern Water presented the first draft of the SoCC at the Joint Officer Group meeting on 21 February 2024.</p> <p>Statutory consultation with local authorities undertaken between 21 March and 19 April 2024, providing 28 days to respond.</p>
29 May to 23 July 2024	Statutory Summer 2024 Consultation	<p>The Project overall, the proposed pipeline routes, the proposed water recycling plant and associated pumping stations, proposed above ground plant along the pipeline route.</p> <p>The PEI Report formed part of the suite of consultation documents.</p>
5 March to 4 April 2025	Statutory Spring 2025 Consultation	Environmental water quality and design refinements across the Project.

Your views on consultation

To inform the AoCM submission, we would be grateful to receive your views and any relevant supporting material on our compliance with the following:

- Section 42³ Duty to consult
 - Section 42 of the Planning Act 2008, together with the provisions of sections 43 and 44 of the Planning Act, requires applicants to consult certain persons, including statutory consultees, local authorities, and others with a relevant interest in the land to which the proposed application relates, prior to the submission of an application. The prescribed list of statutory consultees for the purposes of section 42 of the Planning Act 2008 is set out in Schedule 1 to the APFP Regulations 2009, as amended by the Infrastructure Planning (Miscellaneous Provisions) Regulations 2024.
- Section 47⁴ Duty to consult local authority
 - Section 47 of the Planning Act 2008 requires applicants to consult relevant local authorities on what is to be in their SoCC setting out how applicants intend to consult the local community on the proposed Development Consent Order application and then carry out consultation in accordance with the SoCC.
- Section 48⁵ Duty to publicise
 - Section 48 of the Planning Act 2008 requires applicants to publicise the proposed application in the prescribed manner as set out in Regulation 4 of the APFP Regulations 2009.

For ease, we have included a form to assist your response, should you wish to use this format. Please respond in writing to [REDACTED] by **7 June 2025**.

We look forward to hearing from you.

Yours sincerely,

[REDACTED]
Water for Life Hampshire, Planning and Consenting Lead

Enc. Adequacy of Consultation form

³ <https://www.legislation.gov.uk/ukpga/2008/29/section/42>

⁴ <https://www.legislation.gov.uk/ukpga/2008/29/section/47>

⁵ <https://www.legislation.gov.uk/ukpga/2008/29/section/48>



Adequacy of Consultation form

Hampshire Water Transfer and Water Recycling Project

To provide feedback on the adequacy of Southern Water's statutory consultations in advance of the Development Consent Order Application, please fill in the following form.

Local Authority	
Date	

Please state if in your opinion, and with reference to the statutory consultations undertaken for the Hampshire Water Transfer and Water Recycling Project, Southern Water has complied with the following legislative requirements of the Planning Act 2008.

Section 42 ¹ Duty to consult	
Assessment of compliance	Yes / No
Additional comments (optional)	

Section 47 ² Duty to consult local authority	
Assessment of compliance	Yes / No
Additional comments (optional)	

Section 48 ³ Duty to publicise	
Assessment of compliance	Yes / No
Additional comments (optional)	

¹ <https://www.legislation.gov.uk/ukpga/2008/29/section/42>

² <https://www.legislation.gov.uk/ukpga/2008/29/section/47>

³ <https://www.legislation.gov.uk/ukpga/2008/29/section/48>



Further comments (optional)	
Additional comments	

Appendix B Local authority views on adequacy of consultation

B.1 East Hampshire District Council



Adequacy of Consultation form

Hampshire Water Transfer and Water Recycling Project

To provide feedback on the adequacy of Southern Water's statutory consultations in advance of the Development Consent Order Application, please fill in the following form.

Local Authority	East Hampshire District Council
Date	20 th May 2025

Please state if in your opinion, and with reference to the statutory consultations undertaken for the Hampshire Water Transfer and Water Recycling Project, Southern Water has complied with the following legislative requirements of the Planning Act 2008.

Section 42 ¹ Duty to consult	
Assessment of compliance	Yes
Additional comments (optional)	

Section 47 ² Duty to consult local authority	
Assessment of compliance	Yes
Additional comments (optional)	

Section 48 ³ Duty to publicise	
Assessment of compliance	Yes
Additional comments (optional)	

¹ <https://www.legislation.gov.uk/ukpga/2008/29/section/42>

² <https://www.legislation.gov.uk/ukpga/2008/29/section/47>

³ <https://www.legislation.gov.uk/ukpga/2008/29/section/48>

Further comments (optional)	
Additional comments	Both Havant Borough Council and East Hampshire Council has signed up to a PPA with Southern Water.

B.2 Eastleigh Borough Council

Application CS/24/97230
CS/24/97534
CS/25/99012

Hampshire Water Transfer and Water Recycling Project
Southern Water

Please ask for
Direct dial
Working hours
Email

Via email to: [REDACTED]

Tuesday 24 June 2025

Dear Sir/Madam

Description: Southern Water - Hampshire Water Transfer and Water Recycling Project – Adequacy of Consultation Milestone
Site: Havant Thicket Reservoir to Otterbourne Water Supply Works

I am writing to confirm that the Council does consider that the developer has complied with the following duties with respect to its consultation with the Council as the Local Authority and publications within local newspapers for the section of the works located within Eastleigh Borough:

- Duty to consult – Planning Act 2008 (as amended) (PA2008) – section 42
- Duty to consult the local community - PA2008 – section 47
- Duty to publicise - PA2008 – section 48

It should be noted that the Council did not see the newspaper advertisements at the time of publication but has been provided with electronic copies of the advertisements by Southern Water and base its comments on those copies.

We do not comment on whether these duties have been met with regard to other interested parties or other authorities.

Yours faithfully

[REDACTED]

[REDACTED]

Planning Manager

B.3 Fareham Borough Council



Adequacy of Consultation form

Hampshire Water Transfer and Water Recycling Project

To provide feedback on the adequacy of Southern Water's statutory consultations in advance of the Development Consent Order Application, please fill in the following form.

Local Authority	Fareham Borough Council
Date	2 June 2025

Please state if in your opinion, and with reference to the statutory consultations undertaken for the Hampshire Water Transfer and Water Recycling Project, Southern Water has complied with the following legislative requirements of the Planning Act 2008.

Section 42 ¹ Duty to consult	
Assessment of compliance	Yes / No
Additional comments (optional)	The Council considers that all relevant persons, statutory consultees, local authorities and others with relevant interest in the land to which the proposed application relates have been satisfactorily consulted in so far as the impact on Fareham Borough.

Section 47 ² Duty to consult local authority	
Assessment of compliance	Yes / No
Additional comments (optional)	Appropriate consultation with FBC on the SoCC has taken place, and relevant consultations taken place in accordance with the SoCC.

Section 48 ³ Duty to publicise	
Assessment of compliance	Yes / No

¹ <https://www.legislation.gov.uk/ukpga/2008/29/section/42>

² <https://www.legislation.gov.uk/ukpga/2008/29/section/47>

³ <https://www.legislation.gov.uk/ukpga/2008/29/section/48>

Section 48 ³ Duty to publicise	
Additional comments (optional)	Appropriate consultation within local publications has taken place.

Further comments (optional)	
Additional comments	Please note, we do not comment on whether these duties have been met with regard to other interested parties or other authorities.

B.4 Hampshire County Council



Hampshire 2050
The Castle
Winchester, Hampshire SO23 8UL
Telephone 0300 555 1375
Fax 01962 847055
www.hants.gov.uk

Enquiries to



My reference SWAOCM

Direct Line



Your reference

Date

9th June 2025

E-mail



Email to: 

Dear Sir/Madam,

Southern Water adequacy of consultation milestones for the Hampshire Water Transfer and Water Recycling Project

Thank you for consulting the County Council on the adequacy of consultation milestones for the Hampshire Water Transfer and Water Recycling Project.

In response to this request, the County Council provides the response as set out in the table below, which considers whether the applicant has complied with the following duties with respect to its consultation with the County Council as an upper tier Local Authority for this project:

- Duty to consult – Planning Act 2008 (as amended) (PA2008) – section 42
- Duty to consult the local community - PA2008 – section 47
- Duty to publicise - PA2008 – section 48

The County Council will not comment on whether these duties have been met with regard to other interested parties or other authorities.

Southern Water Adequacy of consultation milestones

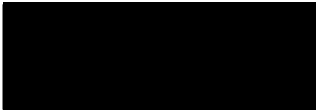
Date	Consultation activity	Details	HCC comments
8 February to 16 April 2021	Non-statutory Public Consultation 2021	Desalination and alternative options	As per Section 42 of the Planning Act, the County Council can confirm that it was consulted on the various options and

			<p>participated in Joint Local Authority Officer Group briefings at this time.</p> <p>Additionally, the County Council has evidence of attendance at Joint Officer Group briefings in October 2021, after this consultation updating local authorities on the decision to discount the Desalination option, instead moving the applicants focus onto the water recycling and water transfer options.</p>
5 July to 16 August 2022	Non-Statutory Summer 2022 Consultation	Water recycling as a new, sustainable water resource, the location of the proposed water recycling plant, the preferred pipeline corridor, and zones for above ground plant	As per Section 42, the County Council was consulted via email (22 nd June 2022) and formally responded on 16 th August 2022.
16 February to 19 April 2024	Consultation on the Statement of Community Consultation (SoCC)	<p>Informal consultation undertaken with local authorities between 16 February and 1 March 2024. Southern Water presented the first draft of the SoCC at the Joint Officer Group meeting on 21 February 2024.</p> <p>Statutory consultation with local authorities undertaken between 21 March and 19 April 2024, providing 28 days to respond.</p>	As per Section 47 and 48 of the Planning Act, the County Council can confirm that it was presented the SoCC at the Joint Officer Group meeting as detailed and then was formally consulted on the SoCC as detailed, without providing any formal comments to the applicant.
29 May to 23 July 2024	Statutory Summer 2024 Consultation	The Project overall the proposed pipeline routes, the proposed water recycling plant and associated pumping	The County Council can confirm that it was formally consulted via a Section 48 notification on this statutory consultation, which included

		stations, proposed above ground plant along the pipeline route. The PEI Report formed part of the suite of consultation documents.	the PEIR, and responded formally on 26 July 2024
5 March to 4 April 2025	Statutory Spring 2025 Consultation	Environmental water quality and design refinements across the project	As per Section 42 of the Planning Act, the County Council can confirm that it was consulted on this consultation via email on 5 th March and responded on 4 th April 2025.

I trust that these comments are of assistance to you. If you wish to discuss any of the comments raised, please do not hesitate to contact the County Council.

Yours sincerely



**Strategic Planning Manager
Hampshire 2050**



Adequacy of Consultation form

Hampshire Water Transfer and Water Recycling Project

To provide feedback on the adequacy of Southern Water's statutory consultations in advance of the Development Consent Order Application, please fill in the following form.

Local Authority	Hampshire County Council
Date	06/06/2025

Please state if in your opinion, and with reference to the statutory consultations undertaken for the Hampshire Water Transfer and Water Recycling Project, Southern Water has complied with the following legislative requirements of the Planning Act 2008.

Section 42 ¹ Duty to consult	
Assessment of compliance	Yes
Additional comments (optional)	Hampshire County Council as a host authority has been consulted on this proposal

Section 47 ² Duty to consult local authority	
Assessment of compliance	Yes
Additional comments (optional)	The County Council as a host authority confirms that the applicant did consult the County Council regarding their statement in respect of who they intended to consult with about the proposed application.

Section 48 ³ Duty to publicise	
Assessment of compliance	Yes

¹ <https://www.legislation.gov.uk/ukpga/2008/29/section/42>

² <https://www.legislation.gov.uk/ukpga/2008/29/section/47>

³ <https://www.legislation.gov.uk/ukpga/2008/29/section/48>

Section 48 ³ Duty to publicise	
Additional comments (optional)	

Further comments (optional)	
Additional comments	

B.5 Havant Borough Council



Adequacy of Consultation form

Hampshire Water Transfer and Water Recycling Project

To provide feedback on the adequacy of Southern Water's statutory consultations in advance of the Development Consent Order Application, please fill in the following form.

Local Authority	Havant Borough Council
Date	17 June 2025

Please state if in your opinion, and with reference to the statutory consultations undertaken for the Hampshire Water Transfer and Water Recycling Project, Southern Water has complied with the following legislative requirements of the Planning Act 2008.

Section 42 ¹ Duty to consult	
Assessment of compliance	Yes
Additional comments (optional)	<p>The applicant has directly consulted Havant Borough Council during formal consultation periods on the proposal. The applicant is also in ongoing informal discussions with Havant Borough Council about the proposed application. This includes joint officer groups for all the relevant LPAs, topic-based meetings regarding the emerging EIA work, as well as bi-lateral meetings between the project team and direct email communications.</p> <p>NB We do not comment on whether or not the applicant has adequately discharged the duties set out in section 42 in relation to other consultees.</p>

Section 47 ² Duty to consult local authority	
Assessment of compliance	Yes
Additional comments (optional)	<p>The applicant consulted Havant Borough Council on its Statement of Community Consultation in the Spring of 2024. To the best of the Council's knowledge the consultation on the scheme took place in accordance with the Statement.</p> <p>NB We are not able to confirm whether or not the applicant undertook all the activities exactly as described in its SoCC.</p>

Section 48 ³ Duty to publicise	
Assessment of compliance	Yes
Additional comments (optional)	The applicant has provided evidence to the Council of notices placed in local newspapers, the Times and the London Gazette.

¹ <https://www.legislation.gov.uk/ukpga/2008/29/section/42>

² <https://www.legislation.gov.uk/ukpga/2008/29/section/47>

³ <https://www.legislation.gov.uk/ukpga/2008/29/section/48>

B.6 Portsmouth City Council

[REDACTED]

[REDACTED]
[REDACTED] [REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Adequacy of Consultation form

Hampshire Water Transfer and Water Recycling Project

To provide feedback on the adequacy of Southern Water's statutory consultations in advance of the Development Consent Order Application, please fill in the following form.

Local Authority	Portsmouth City Council
Date	5 June 2025 & 10 July 2025

Please state if in your opinion, and with reference to the statutory consultations undertaken for the Hampshire Water Transfer and Water Recycling Project, Southern Water has complied with the following legislative requirements of the Planning Act 2008.

Section 42 ¹ Duty to consult	
Assessment of compliance	Yes / Ne
Additional comments (optional)	Portsmouth City Council, being a local authority as defined in S43 PA2008, has been consulted. However, PCC does not at this time have sight of evidence to confirm that all consultees (statutory, non-statutory, other) have been consulted. Following a meeting with Stantec on 10 July, I can confirm that evidence has been presented to conform that all consultees have been consulted.

Section 47 ² Duty to consult local authority	
Assessment of compliance	Yes / Ne
Additional comments (optional)	Southern Water have published a 'statement of community consultation'

¹ <https://www.legislation.gov.uk/ukpga/2008/29/section/42>

² <https://www.legislation.gov.uk/ukpga/2008/29/section/47>

Section 48 ³ Duty to publicise	
Assessment of compliance	Yes / No
Additional comments (optional)	<p>S48(1) requires the applicant to publicise the application in the prescribed manner. Regulation 4(2) of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 sets out where the notices should be published. As with the S42 duty above, PCC does not at this time have sight of evidence to confirm that this has been carried out.</p> <p>Update (10/07/25), PCC can confirm that the application has been publicised in the correct manner.</p>

Further comments (optional)	
Additional comments	

³ <https://www.legislation.gov.uk/ukpga/2008/29/section/48>



B.7 Winchester City Council

[REDACTED]

From: [REDACTED]
Sent: 09 June 2025 12:20
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: HWTWRP - AoCM letter

Many thanks for the below, [REDACTED]

Kind regards,
[REDACTED]



[REDACTED]
Planner
www.quod.com

From: [REDACTED]
Sent: 09 June 2025 12:12
To: [REDACTED]
Subject: RE: HWTWRP - AoCM letter

Good Morning [REDACTED]

I am writing to confirm that the Council does consider that the developer has complied with the following duties with respect to its consultation with the Council as the Local Authority and publications within local newspapers for the initial section of the pipeline within Winchester:

- Duty to consult – Planning Act 2008 (as amended) – section 42
- Duty to consult the local community – section 47
- Duty to publicise - section 48

We do not comment on whether these duties have been met with regard to other interested parties or

From: [REDACTED]
Sent: 09 June 2025 09:25
To: [REDACTED]
Subject: FW: HWTWRP - AoCM letter

Caution: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi [REDACTED]
Good morning,

Hope you had a good holiday!

I apologise for the follow-up, but could you please provide us with your response to the AoCM report by COP today?

Many thanks!
Kind regards,
[REDACTED]



[REDACTED]
Planner
[REDACTED]

Mobile: [REDACTED]
www.quod.com

21 Soho Square
London
W1D 3QP

From: [REDACTED]
Sent: 05 June 2025 10:34
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: HWTWRP - AoCM letter

Hi [REDACTED]
Good morning,

Just a gentle reminder regarding your response for the AoCM report by the end of this week.

Many thanks!
Kind regards,

From: [REDACTED]
Sent: 16 May 2025 16:08

To: [REDACTED]
Cc: [REDACTED]

Subject: HWTWRP - AoCM letter

Hi [REDACTED]
Good afternoon,

Further to the discussion at the Joint Officer Group on 7 May 2025, please find attached a letter and accompanying form asking for your views and any relevant supporting material relating to adequacy of consultation for the Hampshire Water Transfer and Water Recycling Project. Your views will be included in the AoCM report submitted by the Applicant to the Planning Inspectorate with the purpose of reducing the adequacy of consultation risk at the acceptance stage of the DCO submission.

We ask that you kindly respond in writing by **7 June 2025**.

Please let me know if you have any questions about the information included in the letter and form, and we look forward to hearing from you.

Have a lovely weekend!

Many thanks!
Kind regards,

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from
Southern
Water. 

The logo graphic for Southern Water, featuring three stylized, white, wavy lines that resemble water or waves, positioned to the right of the word "Water".