

Hampshire Water Transfer and Water Recycling Project

Potential Main Issues for the Examination

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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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Potential Main Issues for the Examination

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Executive Summary

1. This Potential Main Issues for the Examination ('PMIE') document has been prepared to accompany the application for a Development Consent Order (DCO) for the Hampshire Water Transfer and Water Recycling Project ('the Project'). Its purpose is to set out the matters which the Applicant considers are likely to require examination having regard to the matters discussed with stakeholders during the pre-application process.
2. The PMIE does not represent an exhaustive list of matters that may arise during the DCO Examination and does not preclude interested parties from raising additional matters (insofar as they are relevant having regard to Section 104 of the Planning Act 2008) during the planning process. It may, however, help to inform the Initial Assessment of Principal Issues (IAP) made by the appointed Examining Authority.
3. This PMIE has been prepared and submitted in conformity with the Nationally Significant Infrastructure Projects: November 2025 Pre-application Prospectus (the Prospectus) and Regulation 5(2)(q) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 ('the APFP Regulations') which states: *'The application must be accompanied by... any other documents considered necessary to support the application'*.
4. The PMIE should be read alongside the following DCO submission documents which provide more detail on the pre application engagement process and policy compliance and have informed this document, including:
 - Consultation Report (Document reference 5.1, Volume 5)
 - Draft Statements of Common Ground (Document reference 5.8, Volume 5) (SoCGs)
 - Statement of Engagement (Document reference 5.9, Volume 5)
 - Draft Principal Areas of Disagreement Summary Statements (Document reference 5.13, Volume 5)
 - Planning Policy Statement (Document reference 5.1, Volume 5)
5. Each of these documents has informed the scope and content of this PMIE.
6. The Prospectus identifies that the PMIE will be created from the evolution of an Issues Tracker maintained by applicants during the pre-application process:

'The issues tracking process will culminate in a list of 'potential main issues for the examination' (PMIE) which will be submitted by the applicant with the application. The PMIE should be a short document which, where possible, is agreed by relevant statutory bodies and local authorities. It is entirely separate from the later 'initial assessment of principal issues' (IAP) developed by the appointed Examining Authority, but may, per any evidence within the application documentation, influence the content of the IAP. The function of the PMIE (along

with Principal Areas of Disagreement Summary Statements

<https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus#Component2>) is...to facilitate more robust preparation for examination and a smoother and more proportionate examination experience for all parties’.

7. The PMIE does not seek to describe the relevant planning issues in full detail, which are in many cases complex and subject to a substantial body of technical analysis. This is consistent with the guidance in the Prospectus which advises that PMIE’s should be concise documents.
8. In summary, the Applicant considers the potential main issues for examination are likely to include:
 - The need for new water infrastructure
 - The principle of water recycling
 - Interface with Portsmouth Water assets
 - Water quality
 - Flexibility/optionality sought
 - Control of construction impacts
 - Control of construction traffic
 - Good design
 - Relationship with other planned development
 - Landscape and visual impacts
 - Archaeology and heritage
 - Carbon
 - Control of operational impacts
 - Environmental mitigation and enhancement areas
 - Scope of Project benefits
 - Securing mechanisms and secondary consenting
 - Habitat Regulations Assessment
9. The PMIE, alongside the draft SoCGs, demonstrates that the Project is ready for examination and that the main issues have progressed to a level of maturity that will facilitate a more robust preparation for examination and a smoother and more proportionate examination

1 Introduction

- 1.1.1 This Potential Main Issues for the Examination ('PMIE') document has been prepared on behalf of Southern Water Services Limited (hereafter referred to as 'the Applicant') to accompany the application for a Development Consent Order (DCO) for the Hampshire Water Transfer and Water Recycling Project ('the Project').
- 1.1.2 This document has been prepared and submitted in accordance with the Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus (last updated November 2025) ('the Prospectus') and Regulation 5(2)(q) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 ('the APFP Regulations'), which requires that *'the application must be accompanied by... any other documents considered necessary to support the application.'*
- 1.1.3 The preparation of a PMIE is not a statutory requirement but was introduced as part of one of the six 'primary service features' (*Issues tracker and potential main issues for the examination*) of government guidance contained within the Prospectus. Engagement with each of the primary service features is expected for all three tiers of pre application service (the Applicant has progressed the standard service with the Planning Inspectorate).
- 1.1.4 The purpose of the PMIE is to provide a short document, submitted by the Applicant, setting out the matters which are likely to require examination having regard to the matters discussed with stakeholders during the pre-application process.
- 1.1.5 The PMIE does not represent an exhaustive list of issues that may arise during the DCO Examination and does not preclude interested parties from raising additional matters (insofar as they are relevant having regard to Section 104 of the Planning Act 2008) during the planning process. It may, however, help to inform the Initial Assessment of Principal Issues (IAPI) made by the appointed Examining Authority.
- 1.1.6 The PMIE should be read alongside the following DCO submission documents:
- **Consultation Report** (Document reference 5.1, DCO Volume 5) – which reports on the feedback received through the four stages of pre-application public consultation (and other targeted landowner consultation) and how the Project has had regard and responded to this feedback;
 - **Statement of Engagement** (Document reference 5.9, DCO Volume 5) - which outlines the extensive engagement undertaken by the Applicant (outside of the formal consultation activities) following the transition from the previously considered desalination option to the Project in its form. This includes a Statement of Commonality which identifies what topics of interest, and positions, are shared between different stakeholders.
 - **Draft Statements of Common Ground** (Document reference 5.8, DCO Volume 5) – draft SoCG) have been prepared for key interested parties involved in the Project to outline the agreed, disagreed and unresolved matters between the Applicant and that stakeholder.

- **Principal Areas of Disagreement Summary Statements (PADSS)** (Document reference 5.13, DCO Volume 5) – reflecting any matters which are unlikely to change position as a result of continuing dialogue and therefore identified as matters of disagreement in the SoCGs. The point of difference with the SoCGs is that the PADSS have been prepared by the relevant stakeholder and importantly add further commentary on what that stakeholder considers would be necessary to address the matter of disagreement.
- **Planning Policy Statement** (Document reference 5.5, Volume 5) which provides an assessment of the Project against relevant planning policy.

1.1.7 Each of these documents has informed the scope and content of this PMIE.

1.1.8 The Prospectus identifies that the PMIE will be created from the evolution of an Issues Tracker maintained by applicants during the pre-application process:

‘The issues tracking process will culminate in a list of ‘potential main issues for the examination’ (PMIE) which will be submitted by the applicant with the application. The PMIE should be a short document which, where possible, is agreed by relevant statutory bodies and local authorities. It is entirely separate from the later ‘initial assessment of principal issues’ (IAPI) developed by the appointed Examining Authority, but may, per any evidence within the application documentation, influence the content of the IAPI. The function of the PMIE (along with [PADSS](#)) is...to facilitate more robust preparation for examination and a smoother and more proportionate examination experience for all parties’.

1.1.9 It has, however, been agreed with the Planning Inspectorate during pre-application discussions that in this case a separate Issues Tracker was not necessary in light of separate ‘issues logs’ already developed between the Applicant and individual parties (which serve the same purpose as the Issues Tracker process to fully inform the draft SoCGs (Document reference 5.8, DCO Volume 5)).

1.1.10 The PMIE does not seek to describe the relevant planning issues in full detail, which are in many cases are complex and subject to a substantial body of technical analysis. This is consistent with the guidance in the Prospectus which advises that PMIEs should be concise documents.

1.1.11 There are planning matters which are not included in this list because they are straightforward and unlikely to require detailed examination, have either already been considered in detail through other processes (for example the regional planning process), or they are matters on which there is widespread agreement.

1.1.12 A draft of the PMIE was shared with host local planning authorities, SDNPA and statutory bodies prior to submission to seek agreement that the matters set out present an accurate reflection of the matters discussed during pre-application engagement (noting that more detail is recorded within draft SoCGs and PADSS). Feedback received has been taken into consideration.

1.1.13 The PMIE, alongside the draft SoCGs (Document reference 5.8, Volume 5) and Statement of Engagement (Document reference 5.9, Volume 5), demonstrates that the Project is ready for examination and that the main potential issues have progressed to a level of maturity that will facilitate more robust preparation and a smoother and more proportionate Examination.

2 Potential Main Issues for Examination

- 2.1.1 Table 2-1 follows the preferred format provided by the Planning Inspectorate¹ to set out the potential main issues that the Applicant, having regard to pre-application engagement, considers to be important for Examination.
- 2.1.2 The RAG ratings² provided in the penultimate column of the table reflects a generalised position on the level of agreement on matters at the time of submission. The rating is necessarily a simplification, but the following broad principles have been applied to the RAG rating:
- Red – disagreed positions or objections that are unlikely to change during the Examination
 - Amber – issues that may be resolved during the Examination/mix of stakeholder positions
 - Green – issues on which there is a high level of agreement prior to Examination
- 2.1.3 The final column projects forward to provide commentary on the '*likelihood of the issue being resolved during the Examination*'. Resolution will mean different things to different parties. It is not realistic to expect all stakeholders to agree with the Applicant on all issues nor is universal agreement necessary for the Secretary of State to make a decision. The Applicant is, however, confident that all matters will be progressed to a sufficient level of maturity to enable the Examining Authority to provide a robust recommendation at the end of the statutory six month Examination period having regard to all parties' positions and sufficient technical evidence.

¹ [Potential Main Issues for Examination template.docx](#)

² There is no specific guidance on how to complete the RAG column beyond the reference in the Prospectus in relation to issues trackers that '*the degree of risk associated with each issue identified in the tracker should be allocated a 'RAG' (red, amber, green) status*'.

Table 2-1: Description of potential main issues

Ref	Description of issue	Affected Stakeholder(s)	Signposting (to application evidence)	RAG	Likelihood of the issue being resolved during the Examination
1	<p>Need for new water infrastructure – there is a recognised critical and urgent need for water resource infrastructure, as reflected in the National Policy Statement for Water Resources Infrastructure (NPSWRI).</p>	<p>Local Planning Authorities/Statutory Environmental Bodies generally recognise the overarching need for new water supply infrastructure.</p> <p>Local communities – mixed views with some recognition of the need to address water supply issues whilst others proposed better infrastructure maintenance and water storage capacity.</p>	<p>Case for the Project (Document reference 5.6, DCO Volume 5).</p> <p>Consultation Report (Document reference 5.1, DCO Volume 5).</p> <p>Draft Statements of Common Ground (Document reference 5.8, DCO Volume 5).</p>		<p>High – the Applicant has presented a robust needs case in the Case for the Project document – including evidence of the recognised need for new water infrastructure at the national, regional and local level. It is the Applicant’s case that the need for the Project does not require further consideration during Examination.</p> <p>Rated amber at the time of submission as some parties reserving a formal position until the application has been submitted.</p>
2	<p>Principle of water recycling/selection of technology - the Project was identified through the Water Resources Management Plan 2019 (WRMP19) Annual Review process, included within the WRSE Final Regional Plan and in the emerging Water Resources Management Plan 2024 (WRMP24).</p> <p>However, in advance of the publication of WRMP24, in accordance with the NPSWRI paragraph 1.4.7, where a project is not present in a final Water Resources Management Plan (WRMP), development consent applicants will need to make the case for the need for the Project on a case by case basis.</p>	<p>Local communities - concerns regarding the principle of water recycling.</p> <p>Havant Borough Council - concern relating to the choice of scheme to help meet this need and principle of water recycling technology (SoCG ref. HBC-2024-SC-0001).</p> <p>Portsmouth City Council - noted the need for Southern Water to convince local authorities and the public that the technology is safe and that they are a responsible operator.</p> <p>Winchester City Council – note support for the Applicant’s WRMP process, which rigorously appraised a wide range of options - including reservoirs, desalination, and water recycling - against environmental, social, and economic criteria</p> <p>Fareham Borough Council – confirm that having reviewed the draft needs case the project does appear to be the best solution for diversifying Southern Water’s sources of water supplies (SoCG ref. FBC-2025-0001)</p> <p>Environment Agency – support for water recycling (SoCG ref. EA-ES-073).</p> <p>Natural England sees this project as one of the schemes needed to improve the condition of the Test and Itchen in the future (SoCG ref. NE-ES-032)</p>	<p>ES Chapter 4 Consideration of alternatives, Volume I (Document reference 6.1, DCO Volume 6).</p> <p>Scheme Development Report (Document reference 5.10, DCO Volume 5).</p> <p>Draft Statements of Common Ground (Document reference 5.8, DCO Volume 5).</p> <p>Case for the Project (Document reference 5.6, DCO Volume 5).</p> <p>Consultation Report (Document reference 5.1, DCO Volume 5).</p>		<p>Medium – concerns expressed through consultation in relation to the principle of water recycling are unlikely to change during Examination. The principle of water recycling is, however, well established and recognised in national policy, widely used around the world and supported by the Environment Agency. It is not for this Examination to consider the principle of the technology.</p> <p>The benefits of water recycling are recognised in the NPSWRI (paragraphs 2.6.15 – 2.6.16), the Water Resources South East (WRSE) Final Regional Plan (which proposes the development of six water recycling schemes across the south-east region by 2035 and a further two by 2075) (paragraphs 1.26 – 1.27) and through the Applicant’s WRMP19 Annual Review and emerging WRMP24.</p> <p>A Full Advanced Treatment Pilot Plant was Installed at Budds Farm and Peel Common Wastewater Treatment Works (WwTW) in the South of England between 2020 to 2023. This provided considerable confidence in these technologies and their configurations that have been established, tested and applied globally.</p>
3	<p>Interface with Portsmouth Water assets - connecting to pipelines being delivered by Portsmouth Water between Bedhampton Springs and Havant Thicket Reservoir.</p>	<p>Portsmouth Water – delivering Havant Thicket Reservoir and Pipelines to Bedhampton Springs.</p> <p>Portsmouth City Council - note that the Applicant should work with Portsmouth Water</p>	<p>ES Chapter 3 Description of Proposed Development, Volume I (Document reference 6.1, DCO Volume 6).</p>		<p>High - the Applicant is involved in sustained engagement with Portsmouth Water. Technical interfaces are discussed across a range of meetings, amounting to daily interaction. Engineering interfaces are well documented, with control, land, asset protection, security and environmental concerns all under continuous review during design development.</p>

Ref	Description of issue	Affected Stakeholder(s)	Signposting (to application evidence)	RAG	Likelihood of the issue being resolved during the Examination
		for consistent high quality aims for wider landscape ecological protection.	Draft Statements of Common Ground (Document reference 5.8, DCO Volume 5).		
4	Water quality – linked to the principle of water recycling, concerns regarding the potential for water quality deterioration and ecological harm.	<p>Local communities – concern related to the implications of introducing recycled water into Havant Thicket Reservoir and drinking water supply.</p> <p>Havant Borough Council - concern relating to potential for water quality deterioration and ecological harm from the proposed Project (SoCG ref. HBC-2025-SC-0001).</p> <p>Eastleigh Borough Council - concern relating to the chemical make-up of water going into the River Itchen (SoCG ref. EBC-2024-SC-0006).</p>	<p>Consultation Report (Document reference 5.1, DCO Volume 5).</p> <p>ES Chapter 3 Description of Proposed Development, Volume I (Document reference 6.1, DCO Volume 6).</p> <p>ES Chapter 8 Terrestrial and freshwater biodiversity, Volume I (Document reference 6.1, DCO Volume 6).</p> <p>ES Chapter 9 Marine biodiversity, Volume I (Document reference 6.1, Volume 6).</p> <p>ES Chapter 19 Water environment, Volume I (Document reference 6.1, Volume 6).</p> <p>Draft Statements of Common Ground (Document reference 5.8, DCO Volume 5).</p>		<p>High – although some concerns may remain at the point of submission the Applicant’s environmental water quality modelling and assessment (which form part of the application) predicts no deterioration in water quality or aquatic ecology in Havant Thicket Reservoir or downstream bodies.</p> <p>This is fully reported in ES Chapter 19 Water environment, Volume I (Document reference 6.1, DCO Volume 6), ES Chapter 8 Terrestrial and freshwater biodiversity, Volume I (Document reference 6.1, DCO Volume 6) and ES Chapter 9 Marine biodiversity, Volume I (Document reference 6.1, DCO Volume 6) submitted with the DCO application.</p> <p>The Contractor would be required to produce a water monitoring plan in line with ES Appendix 19.9 Outline Water Monitoring Plan, Volume II (Document reference 6.2, DCO Volume 6). The monitoring plan will outline trigger levels and action plans (to be agreed with stakeholders) to mitigate any observed impacts once the Project is operational.</p>
5	Flexibility/optionality – the need for and assessment of the flexibility sought by the Applicant through the DCO.	<p>Fareham Borough Council and Hampshire County Council – IPS-F access (SoCG refs FBC-2023-0004, FBC-2023-0016, HCC-2025-0053).</p> <p>Winchester City Council – Pipeline sections G and E under River Meon and River Itchen (SoCG refs WCC-2022-0023 and WCC-2022-0024).</p> <p>Winchester City Council – Otterbourne WSW (SoCG ref. WCC-2025-SC-0015).</p> <p>Fareham Borough Council – IPS-F Landscaping within Limits of Deviation (SoCG refs FBC-2025-SC-0003).</p> <p>Hampshire County Council – issues relating to the compound access points (various references in the SoCG) specifically that design details would not be secured.</p>	<p>ES Chapter 3 Description of Proposed Development, Volume I (Document reference 6.1, DCO Volume 6).</p> <p>Draft Development Consent Order (Document reference 3.1, DCO Volume 3).</p> <p>Works Plans (Document reference 2.3, DCO Volume 2).</p> <p>Statement of Reasons (Document reference 4.1, DCO Volume 4).</p> <p>Book of Reference (Document reference 4.3, DCO Volume 4).</p> <p>Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7).</p> <p>Draft Statements of Common Ground (Document reference 5.8, DCO Volume 5).</p>		<p>High – whilst some stakeholders have raised concern that aspects of detailed design are not to be provided in the DCO application, the Applicant considers that the level of flexibility sought is appropriate and necessary to ensure the timely delivery of the Project and to avoid or reduce impacts on existing land uses / sensitive environmental areas through the detailed design. Where flexibility is sought, the ES assesses the worst-case scenario for each topic assessment.</p> <p>Stakeholders have been extensively engaged in the preparation of design principles which will control detailed design.</p>

Ref	Description of issue	Affected Stakeholder(s)	Signposting (to application evidence)	RAG	Likelihood of the issue being resolved during the Examination
			Design Principles Document (Document reference 5.11, DCO Volume 5).		
6	<p>Control of construction impacts (non-traffic) – adequacy of controls contained within the Outline Construction and Environmental Management Plan (Outline CEMP) (Document reference 7.1, DCO Volume 7) to mitigate environmental effects to acceptable levels during construction.</p> <p>Examples of matters of particular interest to stakeholders are provided in the next column with cross reference to SoCG ID numbers.</p>	<p>Local communities – concerns in relation to amenity and impacts during construction.</p> <p>Havant Borough Council – ground contamination (WRP site)/noise and vibration (SoCG refs. HBC-2024-SC-0017, HBC-2025-0003).</p> <p>Portsmouth City Council - ground conditions (SoCG ref. PCC-2022-0017).</p> <p>Environment Agency – noise and vibration/watercourse crossings (SoCG ref: EA-ES-049, EA-ES-038).</p> <p>Hampshire County Council/Winchester City Council – nighttime working (SoCG refs HCC-2024-0191, HCC-2025-0012 and HCC-2024-SC-0017, WCC-2025-0004).</p> <p>Eastleigh Borough Council – impacts on existing trees, vegetation and ecology (SoCG ref EBC-2025-0001 and ‘EBC-2024-SC-0011’).</p> <p>Hampshire County Council – Public Rights of Way closure/management impacts (SoCG ref HCC-2025-SC-0022); Framework Construction Traffic Management Plan (CTMP) (including Framework Construction Worker Travel Plan) (Document reference 7.2, DCO Volume 7) (SoCG ref. HCC-2025-0068), Traffic Management Strategy (Document reference 7.3, DCO Volume 7) (SoCG ref. HCC-2025-SC-0001).</p>	<p>Consultation Report (Document reference 5.1, DCO Volume 5).</p> <p>Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7).</p> <p>Draft Statements of Common Ground (Document reference 5.8, DCO Volume 5).</p> <p>Framework Construction Traffic Management Plan (Document reference 7.2, DCO Volume 7).</p> <p>Traffic Management Strategy (Document reference 7.3, DCO Volume 7).</p>		<p>High – the nature of the proposed controls and commitments have been discussed extensively with stakeholders in pre application discussions.</p> <p>Some parties have reserved a final position until sight of full details in the DCO submission though it is anticipated that all parties’ positions will be confirmed through Examination.</p>
7	<p>Control of construction traffic – adequacy of controls contained within the Framework CTMP (Document reference 7.2, DCO Volume 7) to mitigate traffic effects to acceptable levels.</p>	<p>Highway authorities (Hampshire County Council/Portsmouth City Council) - (SoCG refs. HCC-2025-0068) (PCC-2024-SC-0003 and PCC-2025-SC-0008) - adequacy of controls contained within the Framework CTMP (Document reference 7.2, DCO Volume 7).</p> <p>South Downs National Park Authority - concerns relating to the potential construction routes (SoCG ref SDNPA-2024-SC-0005, SDNPA-2024-SC-0007 and SDNPA-2024-0012).</p>	<p>Framework Construction Traffic Management Plan (Document reference 7.2, DCO Volume 7).</p>		<p>High - the nature of the proposed controls and commitments have been discussed with stakeholders in pre application discussions. The construction access matters are covered in the Framework CTMP (Document reference 7.2, DCO Volume 7) and there are a number where resolution with the highways authority may not be reached.</p> <p>Although some matters remain subject to ongoing consideration once the highways authorities and National Highways have had the opportunity to review the full DCO submission, it is anticipated that all matters are capable of reaching resolution during Examination.</p>

Ref	Description of issue	Affected Stakeholder(s)	Signposting (to application evidence)	RAG	Likelihood of the issue being resolved during the Examination
8	Good design – the approach taken to embedding good design (as evidenced in the Design Approach Document (Document reference 5.12, DOC Volume 5)) and the adequacy and efficacy of the commitments in the Design Principles Document (Document reference 5.11, DCO Volume 5) for the detailed design stage. Applicable across the Project but primarily in relation to the design of permanent above ground plant and WRP site.	Havant Borough Council – controls for detailed design of the Water Recycling Plant (SoCG ref. HBC-2025-0009). Portsmouth City Council – mitigating landscape and visual effects of BPT/IPS-E through design commitments (SoCG ref. PCC-2025-0003). Winchester City Council – BPT-K and IPS-G potential landscape impacts (SoCG refs. WCC-2025-0006, WCC-2024-SC-0004). South Downs National Park Authority – mitigating visual effects of BPT-K through design commitments (SoCG ref SDNPA-2025-0004). Fareham Borough Council – relationship between IPS-F and Welborne development (SoCG ref FBC-2024-SC-0010).	Design Principles Document (Document reference 5.11, DCO Volume 5). Design Approach Document (Document reference 5.12, DCO Volume 5). Scheme Development Report (Document reference 5.10, DCO Volume 5).		High – the Design Approach Document (Document reference 5.12, DOC Volume 5) demonstrates how good design has been embedded in Project development. The Design Principles have been subject to extensive consultation and engagement with the host Local Planning Authorities (and SDNPA) during pre-application discussions. Further site specific details are provided in draft SoCGs. The rating at submission is 'amber' until stakeholders have reviewed the final Design Principles Document (Document reference 5.11, DCO Volume 5) submitted with the application.
9	Relationship with other planned development - interface between the siting, layout, design, landscaping, traffic and access arrangements of IPS-F and Welbourne development/site selection for the WRP site.	Fareham Borough Council and Hampshire County Council/Welborne Garden Village - (SoCG refs. HCC-2025-0053, FBC-2024-SC-0010, FBC-2025-0003). Havant Borough Council – with regard to the Water Recycling Plant location (SoCG ref. HBC-2025-0010).	Design Principles Document (Document reference 5.11, DCO Volume 5). Design Approach Document (Document reference 5.12, DCO Volume 5). Scheme Development Report (Document reference 5.10, DCO Volume 5). Draft Statements of Common Ground (Document reference 5.8, DCO Volume 5).		High – potential for impacts on planned development was considered at an early stage of Project development as demonstrated in the Project Development Report (Document reference 5.10, DCO Volume 5). The Order Limits for example to the east of the roundabout junction between Wickham Road (A32) and Knowle Road provide flexibility on the alignment of the Project with Welborne Garden Village. With regard to the WRP site, HBC have confirmed agreement on the principle of the location of the WRP on a site currently allocated for employment uses in the adopted development plan.
10	Landscape and visual impacts - the adequacy of the commitments in the Outline Landscape and Ecology Management Plan (LEMP) (Document reference 7.5, DCO Volume 7) and Design Principles Document (Document reference 5.11, DCO Volume 5) in mitigating landscape and visual effects, including effects on setting, to an acceptable level in planning terms.	Local Planning Authorities – concerns regarding appropriate planting and species (SoCG refs: HBC-2024-0021, HBC-2024-SC-0003, PCC-2025-0006, WCC-2025-0001, EBC-2025-0001, FBC-2025-SC-0003). South Downs National Park Authority - concerns about potential impacts of the Project on the setting of the National Park and its effects on biodiversity (SoCG refs SDNPA-2024-SC-0001).	ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6) Outline LEMP (Document reference 7.5, DCO Volume 7). Design Principles Document (Document reference 5.11, DCO Volume 5). Draft Statements of Common Ground (Document reference 5.8, DCO Volume 5).		High – although the Project would result in temporary likely significant landscape and visual effects during construction and two instances of residual visual effects during operation (in relation to IPS F and BPT / IPS E), measures to mitigate these effects as far as reasonably practicable to an appropriate level have been subject to extensive pre-application discussion. Subject to stakeholders reviewing detail in the DCO submission, it is anticipated that agreement can be reached on mitigation measures and conclusions of the environmental assessment.
11	Archaeology and heritage – concern regarding the timetable for post-DCO archaeological evaluation and mitigation.	Winchester City Council - concerns regarding the details, scale and timeframes required for pre commencement Archaeology works (SoCG refs: WCC-2025-0010).	ES Chapter 7 Archaeology and cultural heritage, Volume I (Document reference 6.1, Volume 6).		Medium - the Environmental Statement sets out the approach to archaeological assessment and mitigation, including early programming of archaeological works to avoid conflict with the construction schedule. The Outline WSI

Ref	Description of issue	Affected Stakeholder(s)	Signposting (to application evidence)	RAG	Likelihood of the issue being resolved during the Examination
			<p>Draft Development Consent Order (Document reference 3.1, Volume 3).</p> <p>Outline Written Scheme of Investigation (WSI) (Document reference 7.6, DCO Volume 7).</p> <p>Design Principles Document (Document reference 5.11, DCO Volume 5).</p> <p>Draft Statements of Common Ground (Document reference 5.8, Volume 5).</p>		(Document reference 7.6, DCO Volume 7) has been shared and forms part of the Development Consent Order application documents. Some concerns regarding the details, scale and timeframes required for pre-commencement archaeology works raised by stakeholders. Discussions have progressed up to the point of submission to seek to address outstanding concerns.
12	Carbon – the extent to which the commitments in the Outline Carbon Management Plan (Document reference 7.8, DCO Volume 7) demonstrate that greenhouse gas emissions will be as low as reasonably practicable.	<p>Havant Borough Council – concerns regarding energy intensity of operational use (SoCG ref. HBC-2024-SC-0009).</p> <p>Eastleigh Borough Council – encourage measures to drive down carbon emissions (SoCG refs EBC-2024-SC-0013).</p>	<p>Consultation Report (Document reference 5.1, DCO Volume 5).</p> <p>Outline Carbon Management Plan (Document reference 7.8, DCO Volume 7).</p> <p>Draft Statements of Common Ground (Document reference 5.8, DCO Volume 5).</p>		<p>High – the Project would not have a material impact on the ability for government to meet its carbon commitments and budget. The approach proposed in the outline Carbon Management Plan (Document reference 7.8, DCO Volume 7) to secure measures that would reduce greenhouse gas emissions as low as reasonably practicable, has been discussed with key stakeholders.</p> <p>The rating at submission is ‘amber’ until stakeholders have reviewed the final outline Carbon Management Plan (Document reference 7.8, DCO Volume 7) submitted with the application.</p>
13	Control of operational impacts – adequacy of controls contained within the Operational Environmental Management Plan (Document reference 7.7, DCO Volume 7) to mitigate environmental effects to acceptable levels during operation.	Local Planning Authorities - concerns focus on ensuring that construction and operational access on the Public Right of Way network is safely managed, concerns regarding procedures in the event of system failure, and the operational impacts on local watercourses, the Solent, and the Havant Thicket Reservoir (SoCG refs HCC-2025-SC-0022, WCC-2024-0035, PCC-2022-0017, HBC-2024-SC-0009).	<p>Outline Operational Management Plan (Document reference 7.7, DCO Volume 7).</p> <p>Draft Statements of Common Ground (Document reference 5.8, DCO Volume 5).</p>		<p>High - the nature of the proposed controls and commitments have been discussed with key stakeholders in pre application discussions.</p> <p>Once the full application and assessment documentation is accepted for Examination this will enable discussions to be concluded and fully informed positions to be agreed.</p>
14	Environmental mitigation and enhancement areas – scope and nature of the Environmental Mitigation and Enhancement Areas (EMEA).	<p>Local Planning Authorities - concerns relate to needing clarity on where mitigation planting and improvement measures interact with highway land; concerns regarding the potential conflicts with archaeological remains in these areas; opportunities to provide habitat connectivity (SoCG refs HBC-2024-0021, HCC-2025-0003, WCC-2025-SC-0009; PCC-2025-0003, EBC-2025-SC-0002, SDNPA-2024-SC-0001).</p> <p>Natural England - opportunities for the creation of additional chalk grassland (SoCG ref NE-ES-048, NE-ES-041).</p>	<p>Works Plans (Document reference 2.3, DCO Volume 3).</p> <p>Outline LEMP (Document reference 7.5, DCO Volume 7).</p> <p>Design Principles Document (Document reference 5.11, DCO Volume 5).</p> <p>Pre-application Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4).</p> <p>Draft Statements of Common Ground (Document reference 5.8, DCO Volume 5).</p>		<p>Medium – EMEA included in the DCO application are secured through the Works Plans (Document reference 2.3, DCO Volume 2) and the Design Principles (contained within the Design Principles Document (Document reference 5.11, DCO Volume 5)).</p> <p>The approach to EMEA has been to identify proposals that are multifunctional in order to maximise the benefits provided. For instance, where land was identified to be required for mitigation purposes, it has been considered whether enhancement proposals could take place at the same location to complement the mitigation, provide additional benefit and incorporate good design. There is the potential for ongoing disagreement on the spatial extent of the EMEA</p>

Ref	Description of issue	Affected Stakeholder(s)	Signposting (to application evidence)	RAG	Likelihood of the issue being resolved during the Examination
		Affected landowners – disagreement with spatial extent of the EMEA.	Consultation Report (Document reference 5.1, DCO Volume 5).		with affected landowners and discussions and negotiations with landowners will continue throughout the Examination.
15	Scope of project benefits – the scope of benefits to be delivered by the Project and securing mechanisms for delivery.	Local Planning Authorities (various SoCG references) – including the specific terms of Project benefit commitments. South Downs National Park Authority - Delivering Biodiversity Net Gain (BNG) and Project benefits within setting of National Park (SoCG refs SDNPA-2025-0010 and SDNPA-2025-SC-0008).	Case for the Project (Document reference 5.6, DCO Volume 5). Planning Policy Statement (Document reference 5.5, DCO Volume 5). Pre-application Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4). Draft Statements of Common Ground (Document reference 5.8, DCO Volume 5).		High – the package of proposed Project benefits has been discussed with the local planning authorities with a large degree of agreement as reflected in the draft SoCGs. There is a high degree of confidence that the overall package of Project benefits will be supported and securing mechanisms confirmed during Examination.
16	Securing mechanisms – the role and function of the suite of control documents that will be secured through the DCO as shown in the Commitments Register (i.e. where each Project commitment will be secured).	Local Planning Authorities – concerns that there is uncertainty regarding the mitigation requirements, and unknowns which risk failure to demonstrate compliance with other regulatory regimes, namely highway safety; concerns regarding the level of detail expected in submissions following DCO consent (SoCG refs. HCC-2024-0191, HCC-2024-SC-0011, WCC-2025-SC-0015, PCC-2025-0003, SDNPA-2024-0009). Natural England/Environment Agency/MMO – commitments should be made by the Applicant to safeguard soil resources; BNG delivery as firm commitment; potential impacts of works in the marine environment in the case of pipeline blow-out during construction (SoCG refs NE-ES-034, EA-ES-040, MMO-SCO-005). Havant Borough Council - disagreement on role of Design Principles Document (Document reference 5.11, DCO Volume 5) vs other control documents (SoCG ref. HBC-2025-0011).	Draft Development Consent Order (Document reference 3.1, DCO Volume 3). ES Appendix 5.5 Commitments Register, Volume II (Document reference 6.2, DCO Volume 6). Draft Statements of Common Ground (Document reference 5.8, DCO Volume 5). Design Principles Document (Document reference 5.11, DCO Volume 5).		Medium – the proposed mechanisms for securing the Project commitments have been subject to dialogue with the relevant stakeholders. There is some level of disagreement (for example with Havant Borough Council) on where certain commitments should be secured (rather than with the content of commitments) with a preference for more commitments in one place in the Design Principles Document (Document reference 5.11, DCO Volume 5). The likelihood of the issue being resolved to the satisfaction of the Examining Authority through examination is, however, high.
17	Secondary consenting – the approach to discharging DCO Requirements as proposed in Schedule 2 of the dDCO.	Local Planning Authorities – in relation to the detailed formulation of the DCO requirements. South Downs National Park Authority – Function of South Downs National Park Authority in discharge of requirements and ensuring they are consulted (SoCG ref SDNPA-2025-0011).	Draft Development Consent Order (Document reference 3.1, DCO Volume 3). Draft Statements of Common Ground (Document reference 5.8, Volume 5).		High – the proposed DCO Requirements contained within Schedule 2 (Document reference 3.1, DCO Volume 3) have been shared and discussed with relevant stakeholders through pre application discussions including the proposed mechanisms for secondary approvals by local planning authorities in consultation with relevant statutory bodies.
18	HRA – the conclusions of the HRA and MCZ Report and evidence of agreement with the relevant bodies.	Natural England/Environment Agency/MMO – as the relevant statutory bodies.	HRA Stage 2 and Marine Conservation Assessment Stage 1, including HRA Stage 1		High - NE, the EA and the Marine Management Organisation (MMO) have been consulted throughout the HRA process, including review of draft reports. Further details are provided

Ref	Description of issue	Affected Stakeholder(s)	Signposting (to application evidence)	RAG	Likelihood of the issue being resolved during the Examination
			(Document reference 5.2, Volume 5). Draft Statements of Common Ground (Document reference 5.8, Volume 5).		in draft SoCGs (Document reference 5.8, Volume 5) which demonstrate agreement on the outcomes of the assessments.



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