

# Hampshire Water Transfer and Water Recycling Project

## Draft Statement of Common Ground - South Downs National Park Authority

**VOLUME NUMBER: 5**

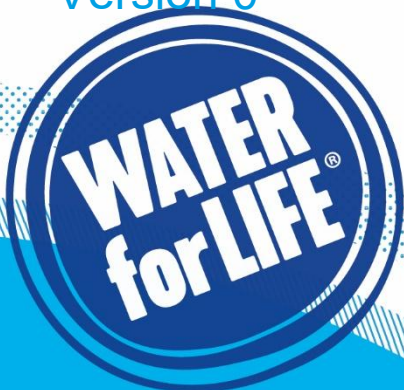
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from  
**Southern  
Water** 

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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# 1 Introduction

## 1.1 Overview of the project

- 1.1.1 Southern Water Services Limited (hereafter referred to as the 'Applicant') is developing proposals for the Hampshire Water Transfer and Water Recycling Project (the Project). The Project is a water supply scheme that will ensure the Applicant can maintain essential water supplies to customers, especially in a drought, while protecting the rare and sensitive River Test and River Itchen chalk streams.
- 1.1.2 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 a 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 the Applicant's Otterbourne Water Supply Works where it would be treated to strict drinking water standards before being sent into supply.

## 1.2 Purpose of this Statement of Common Ground

- 1.2.1 The purpose of this Statement of Common Ground (SoCG) is to set out the areas of agreement and disagreement between the Applicant, and South Downs National Park Authority (SDNPA) in relation to the Development Consent Order (DCO) application for the Project.
- 1.2.2 The role of the SDNPA in the DCO process is to provide input on matters relating to the statutory purposes of the South Downs National Park and the potential effects of the Project on the National Park and its setting.
- 1.2.3 Although the Project does not pass through the National Park and the SDNPA is not a host Local Planning Authority, it is a statutory consultee where development may affect the National Park or its setting. This document supports the examination process by setting out the areas of agreement and those requiring further discussion in relation to matters within the SDNPA's statutory remit.
- 1.2.4 This SoCG has been prepared with due regard to guidance issued under Section 50 of the Planning Act 2008 (PA 2008) concerning pre-application processes, including the Department for Levelling Up, Housing and Communities (2024) Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects ('Pre-application Guidance 2024').

## 1.3 Parties to this statement

- 1.3.1 This SoCG has been prepared by (1) Southern Water Services Limited as the Applicant and (2) South Downs National Park Authority.
- 1.3.2 Collectively, Southern Water Services Limited and South Downs National Park Authority are referred to as 'the parties'.

## 1.4 Terminology

1.4.1 Table 1-1 outlines the terminology in the status column of **Table 3-1**. It can be taken that any matters not specifically referred to in **Table 3-1** are not of material interest or relevance to the parties' representation and therefore have not been considered in this document.

**Table 1-1: Status terminology**

Term	Explanation
Matter agreed with other party	Indicates that both Southern Water and SDNPA have reached a consensus on the specific issue, with no disagreements.
Provisional agreement pending application evidence	Indicates that while consensus has been reached on certain issues, confirmation of agreement is contingent upon SDNPA reviewing and accepting the supporting evidence.
Matters subject to further discussion	Indicates that the specific issues are still under discussion, and no final agreement has been reached yet.
Matter not able to be agreed	Indicates that an agreement on the specific issue has not been reached, and it is unlikely that further discussions will resolve the disagreement.

## 2 Record of post DCO submission engagement

- 2.1.1 The Applicant has engaged with SDNPA throughout the development of the DCO application.
- 2.1.2 A comprehensive record of pre-application engagement, including statutory consultation carried out under section 42 of the PA 2008, is provided in the Statement of Engagement (Statement of Commonality appended) (Document reference 5.9, DCO Volume 5) and the Consultation Report (Document reference 5.1, DCO Volume 5).
- 2.1.3 This SoCG has been prepared for submission with a reporting cut-off date of 17 April 2026. Engagement with SDNPA has continued beyond this date and will remain ongoing throughout the Examination. Accordingly, while this submitted version reflects all engagement up to 17 April 2026, the SoCG will continue to evolve as a live document, with further updates provided as additional discussions take place and outstanding matters progress.
- 2.1.4 This version of the SoCG is submitted in draft and unsigned form. The content of this version has nevertheless been reviewed and agreed for submission by the relevant officer(s) at SDNPA. The Applicant confirms that at the reporting cut-off date, this version accurately reflects the matters discussed and the current position between the parties. Formal agreement and signing of the SoCG will be progressed as engagement continues during the Examination.
- 2.1.5 Since the reporting cut-off date, where necessary, bilateral engagement with SDNPA on unresolved matters from the pre-application phase, matters arising during Examination, and areas where further clarification is required has continued. Where engagement has occurred, any records relevant to these matters will be set out in future iterations of this section.

### 3 Statement of Common Ground

3.1.1 **Table 3-1** provides a summary of the key matters discussed between the Applicant and SDNPA in relation to the DCO application for the Project. Each matter is categorised according to its status, as defined in section 1.4. **Table 3-1** aims to clearly present the areas of agreement, those still under discussion, and any unresolved issues.

**Table 3-1: Summary of matters**

Row ID	Topic	Summary of Stakeholder issue	Latest position in resolving the issue	Application document reference	Status
<b>Principle of development</b>					
SDNPA-2025-0009	Principle of development	SDNPA stated that it would welcome the options for the pipeline routing which avoid the National Park and would welcome further engagement as the options are narrowed down.	The Applicant confirmed with SDNPA in June 2023, that the pipeline routes now sit outside of the National Park. The Applicant also committed to continued engagement with the SDNPA to meet their duty to the National Park under Section 245 (Protected Landscapes) of the Levelling-up and Regeneration Act 2023.		Matter agreed with other party
<b>DCO and planning</b>					
SDNPA-2025-SC-0008	Legacy and enhancements	SDNPA noted that as part of Section 245 of the Levelling-up and Regeneration Act 2023, the SDNPA will seek to further opportunities for enhancement projects within the Meon Valley that potentially demonstrate multiple benefits.	<p>Further opportunities for enhancement projects within the Meon Valley that potentially demonstrate multiple benefits were discussed with SDNPA in a bilateral meeting on 3 April 2025.</p> <p>The Applicant discussed the approach to meeting the duty to 'further the purposes' of the National Park in December 2025, which is a three stranded approach to demonstrating compliance:</p> <ul style="list-style-type: none"> <li>• Scheme evolution avoiding the National Park.</li> <li>• Intrinsic project benefits (e.g. chalk stream improvements).</li> <li>• Potential enhancements within the Order Limits and National Park setting.</li> </ul> <p>SDNPA confirmed that this approach is appropriate and confirmed agreement that the avoidance of the SDNP was a significant beneficial measure. Matters subject to full review of final application documents, with SDNPA final position being informed by the details of the third strand.</p>		Provisional agreement pending application evidence
SDNPA-2025-0011	DCO Process	SDNPA noted that it will not be the relevant planning authority for securing requirements under the DCO, as none of the requirements apply within its boundary. However, SDNPA stated that several decisions will be made at later stages (e.g. LEMP, CEMP) where SDNPA involvement may be appropriate.	Subject to final DCO drafting (Document 3.1, Volume 3) both parties agree that SDNPA will be a named consultee on detailed design for permanent works in the setting of the SDNP.	Draft development consent order (Document 3.1, Volume 3).	Provisional agreement pending application evidence

Row ID	Topic	Summary of Stakeholder issue	Latest position in resolving the issue	Application document reference	Status
		SDNPA stressed the importance of ensuring SDNPA is explicitly name-checked in relevant requirements so that the relevant local authority does not overlook the need to consult the Authority. The intention is not for SDNPA to be the decision-maker, but to ensure the Authority remains a formal consultee.			
<b>Design and construction</b>					
SDNPA-2024-0004	Design and construction	The design of proposed Above Ground Plant (AGP) needs to be refined to address comments from SDNPA received through bilateral meetings. This needs to include materials and finishes, which should be reflected in the site-specific design principles.	The updated Design Principles (Document reference 5.11, DCO Volume 5) were shared with SDNPA and other Local Planning Authorities on 4 September 2025. Site-specific design principles are included for each AGP and these cover materials and finishes. GDP4 is also relevant.	Design Principles Document (Document reference 5.11, DCO Volume 5).	Matter agreed with other party
SDNPA-2024-0005	Design and construction	SDNPA maintains that proposals for AGPs must demonstrate adherence to agreed design principles and must address cumulative, landscape, and visual impacts on the South Downs National Park's (SDNP) setting.	Further AGP details were presented to SDNPA at the 28 June 2023 bilateral meeting, with refined information due to be shared in December 2023. A subsequent meeting on 24 January 2024 covered the site selection process and key parameters for IPS-G near Wickham, close to the SDNPA boundary.  The parties agree with the maximum building/structure heights for AGP as set out in the Design Principles Document (Document reference 5.11, DCO Volume 5).	Design Principles Document (Document reference 5.11, DCO Volume 5).	Matter agreed with other party
SDNPA-2025-SC-0003	Design and construction	Design Refinement 20 – Break Pressure Tank K: Winchester Road marks the boundary of the SDNP. The proposed construction access is just outside. This is an unlit stretch of road, marked by mature field boundaries. The commitment to minimising vegetation removal is noted. Consideration should be given to the ecological impact that even the temporary removal of the hedge may have to wider habitat connectivity.	The Applicant issued updated design principles to SDNPA on 4 September 2025, setting out the proposed approach to minimising impacts and associated mitigation in relation to BPT-K.  Ecological impacts due to temporary removal of any landscape features are assessed in ES Chapter 8 Terrestrial and freshwater biodiversity, Volume I (Document reference 6.1, DCO Volume 6).	Design Principles Document (Document reference 5.11, DCO Volume 5).  Chapter 8 Terrestrial and freshwater biodiversity, Volume I (Document reference 6.1, DCO Volume 6).	Matter agreed with other party
SDNPA-2025-SC-0004	Design and construction	Design Refinement 21 – Alma Lane and Scivier's Lane: SDNPA welcomes the increase in the draft Order limits to provide appropriate environmental mitigation and enhancements. This specific refinement is adjacent to the SDNP boundary – opportunities to link to the wider habitat type, to ensure maximum benefits should be incorporated in the Design Principles Document (Document reference 5.11, DCO Volume 5).	Updated design principles were issued by the Applicant to SDNPA on 4 September 2025.  PL_24 states that EMEA-K-5 will involve 'Creation of other neutral grassland habitat for BNG as set out in the Outline Landscape and Ecology Management Plan (Outline LEMP) (Document reference 7.5, DCO Volume 7).'	Design Principles Document (Document reference 5.11, DCO Volume 5).  Outline LEMP (Document reference 7.5, DCO Volume 7).	Matter agreed with other party
SDNPA-2025-SC-0005	Design and construction	Design Refinement 22 – construction compound L-1: The revised Order limits would be in closer proximity to the SDNP boundary than previously proposed. SDNPA asked the Applicant considers	Construction compound L-1 was amended following engagement with the landowner. This amendment did not introduce additional	ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6).	Matter agreed with other party

Row ID	Topic	Summary of Stakeholder issue	Latest position in resolving the issue	Application document reference	Status
		whether any additional mitigation measures would be required in respect of construction methods and management.	vegetation loss, and the veteran tree in the field will continue to be retained.  Impacts on landscape character have been assessed in the Landscape and Visual Impact Assessment (LVIA) in ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6).		
SDNPA-2024-0009	Design and construction	SDNPA expressed that if Appendix C Indicative Environmental Masterplan within the Design Approach Document (Document reference 5.12, DCO Volume 5) is purely illustrative, they would expect final design details to be a requirement for the DCO to ensure the benefits that the masterplan suggests and relies upon will be realised through construction, operation and ongoing management. This will mean that the control documents will need to demonstrate consistency and clear links, so that conflicts are avoided.	Appendix C Indicative Environmental Masterplan within the Design Approach Document (Document reference 5.12, DCO Volume 5) presents an illustrative example of how the detailed design could come forward in accordance with the control documents including the Works Plans (Document reference 2.3, DCO Volume 2), Outline LEMP (Document reference 7.5, DCO Volume 7) and Design Principles Document (Document reference 5.11, DCO Volume 5). It has also been used to inform the package of benefits set out in the Case for the Project (Document reference 5.6, DCO Volume 5).  Appendix C Indicative Environmental Masterplan within the Design Approach Document (Document reference 5.12, DCO Volume 5) will not contain any commitments that need to be secured that are not already included in those documents. Matters subject to full review of the Outline LEMP (Document reference 7.5, DCO Volume 7) and Appendix C Indicative Environmental Masterplan within the Design Approach Document (Document reference 5.12, DCO Volume 5) as part of the DCO application.	Design Principles Document (Document reference 5.11, DCO Volume 5).  Appendix C Indicative Environmental Masterplan within the Design Approach Document (Document reference 5.12, DCO Volume 5).  Works Plans (Document reference 2.3, DCO Volume 2).  Outline LEMP (Document reference 7.5, DCO Volume 7).  Case for the Project (Document reference 5.6, DCO Volume 5).	Provisional agreement pending application evidence.
<b>Habitats and ecology</b>					
SDNPA-2025-SC-0006	Terrestrial ecology – trees/woodland	Design Refinement 22 – construction compound L-1.  There is a veteran tree around which the Order limits have been drawn. Your attention is drawn to the standing advice from Forestry Commission and Natural England, as well as the guidance from the Woodland Trust: What is a Root Protection Area (RPA)? – Woodland Trust.	The Applicant confirmed that approach from arboricultural, ecological and landscape perspectives. The order limits and construction compound L-1 avoids the nearby veteran tree (T688) and its RPA.  An Arboricultural survey undertaken between March 2023 and March 2025 informed ES Appendix 13.5 Arboricultural Impact Assessment, Volume II (Document reference 6.2, DCO Volume 6), which maps all RPA's and identified veteran and ancient trees. The Project design evolved in response to these findings, embedding measures to avoid or reduce impacts. Primary mitigation, set out in the Outline Construction Environmental Management Plan (CEMP) (Document reference	ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6).  ES Appendix 13.5 Arboricultural Impact Assessment, Volume II (Document reference 6.2, DCO Volume 6).  Outline CEMP (Document reference 7.1, DCO Volume 7).	Matter agreed with other party

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			<p>7.1, DCO Volume 7), ensures no loss or deterioration of ancient and veteran trees, and no residual likely significant adverse effects on these features are anticipated.</p> <p>Landscape character impacts, including effects on trees and hedgerows, are assessed in the LVIA in ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6). ES Appendix 13.5 Arboricultural Impact Assessment, Volume II (Document reference 6.2, DCO Volume 6) specifies protection measures to existing trees.</p>		
SDNPA-2025-SC-0007	Terrestrial and freshwater ecology – mitigation	<p>Design Refinement 25 – Otterbourne Water Supply Works.</p> <p>As with Design Refinement 21, the Order limits have been increased to provide appropriate environmental mitigation and enhancements. This brings the Order limits closer to the SDNP boundary, which is adjacent to the train line. Opportunities to provide habitat connectivity – if appropriate – should be considered as part of the Design Principles (Document reference 5.11, DCO Volume 5).</p>	The Applicant issued updated draft design principles to the SDNPA on 4 September 2025. Please refer to PL_10 and PL_11 (Document reference 5.11, DCO Volume 5).	Design Principles Document (Document reference 5.11, DCO Volume 5).	Matter agreed with other party
SDNPA-2025-0007	Terrestrial and freshwater ecology – mitigation	SDNPA advised that measures will need to be put in place during construction e.g. ecological mitigation. Concerns about 'significant' impacts on habitats and protected species within the SDNP without appropriate package of embedded and secondary mitigation being implemented.	<p>SDNPA policies have informed the embedded protected habitat and species mitigation detailed in ES Chapter 8 Terrestrial and freshwater biodiversity, Volume I (Document reference 6.1, DCO Volume 6), and the Design Principles Document (Document reference 5.11, DCO Volume 5). They also underpin the approaches in the Outline CEMP (Document reference 7.1, DCO Volume 7), Outline LEMP (Document reference 7.5, DCO Volume 7), Appendix C Indicative Environmental Masterplan within the Design Approach Document (Document reference 5.12, DCO Volume 5) and the Habitats Regulations Assessment (HRA) Stage 2: Appropriate Assessment (Document reference 5.2, DCO Volume 5). Its requirements are also consistent with the Biodiversity Gain Plan (Document reference 7.11, DCO Volume 7).</p> <p>Matters subject to full review of the Outline CEMP (Document reference 7.1, DCO Volume 7) and Outline LEMP (Document reference 7.5, DCO Volume 7) as part of the DCO application.</p>	<p>Outline LEMP (Document reference 7.5, DCO Volume 7).</p> <p>Outline CEMP (Document reference 7.1, DCO Volume 7).</p> <p>ES Chapter 8 Terrestrial and freshwater biodiversity, Volume I (Document reference 6.1, DCO Volume 6).</p> <p>Habitats Regulations Assessment Stage 2: Appropriate Assessment (Document reference 5.2, DCO Volume 5).</p> <p>Appendix C Indicative Environmental Masterplan within the Design Approach Document (Document reference 5.12, DCO Volume 5).</p>	Provisional agreement pending application evidence

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				Biodiversity Gain Plan (Document reference 7.11, DCO Volume 7).  Design Principles Document (Document reference 5.11, DCO Volume 5).	
SDNPA-2024-SC-0006	Terrestrial and freshwater ecology – mitigation	The Outline LEMP should make clear that it applies to both the above-ground plant and the reinstatement of the land over the pipeline (accepting that easements may be required).  SDNPA will continue to work with the Applicant to identify potential projects that could be developed to provide mitigation and enhancement through the Project that support the objectives of the South Downs National Park People and Nature Networks (PANN) Strategy.	The Applicant will continue to discuss opportunities with SDNPA for potential enhancement/furtherance.  The Outline LEMP (Document reference 7.5, DCO Volume 7) will be available to SDNPA as part of the DCO application.  Matters subject to full review of the Outline LEMP (Document reference 7.5, DCO Volume 7) as part of the DCO application.	Outline LEMP (Document reference 7.5, DCO Volume 7).  Environmental Net Gain Statement (Document reference 7.12, DCO Volume 7)	Provisional agreement pending application evidence.
<b>Biodiversity and nature conservation</b>					
SDNPA-2025-0010	Biodiversity Net Gain/Environmental Net Gain	SDNPA would seek to work with the Applicant to deliver the project’s BNG requirements through SDNPA’s numerous BNG habitat banks across the National Park.  SDNPA asked that the DCO demonstrates opportunities for SDNPA to deliver or support off-site BNG.  Applicant should be clear where BNG delivery is coming forward to deliver additional benefits as part of the Indicative Environmental Masterplan.	The Applicant is currently working closely with SDNPA to explore BNG opportunities and will continue to engage with SDNPA on the Projects BNG plans, in line with the Biodiversity Gain Plan (Document reference 7.11, DCO Volume 7).	Biodiversity Gain Plan (Document reference 7.11, DCO Volume 7).	Matters subject to further discussion.
<b>Landscape and visual impact</b>					
SDNPA-2023-0004	Landscape and visual impact - methodology	The three planning policy environments present: outside the SDNP, inside the setting and within the SDNP should be defined in the methodology for the scoping. Each will require a different approach to design and response to landscape mitigation. SDNPA would appreciate the opportunity to feed into this process.	The LVIA in ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6) gives specific regard to the statutory status, purposes and Special Qualities of the SDNP. SDNP policies shaped the scope and the design of the Project’s multi-functional mitigation and enhancement measures.  Over 100 viewpoints were selected to represent the views of different visual receptor groups, including users of public rights of way and public access land within the SDNP. The LVIA also assesses potential effects on dark night skies, tranquillity, and other special qualities of the National Park. Each viewpoint is illustrated with	ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6).  Outline LEMP (Document reference 7.5, DCO Volume 7).	Matter agreed with other party

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			<p>winter and summer photography, with 20 photomontages focused on the permanent above ground plant.</p> <p>The Dark Night Sky Reserve (DNSR) boundary lies over 2,000m from the Order Limits; hence, significant effects on dark skies are not anticipated.</p>		
SDNPA-2023-0007	Landscape and visual impact - methodology	<p>The SDNPA has identified that the information provided regarding setting remains unclear. A proper understanding of setting is essential, particularly in establishing the landscape and visual connections between the study area and the SDNP. One of the reasons the SDNPA is requesting further detail on landscape receptors is to support a clearer understanding of this aspect.</p> <p>The SDNPA has been unable to locate any spatial setting information on the Projects GIS database, even in draft form, and no methodology for determining setting has been shared. While it is acknowledged that work may be progressing in the background, this issue remains unresolved. As previously discussed, different planning policies apply to designated landscapes, their settings, and non-designated landscapes. Robust evidence is required to determine which policies are applicable and where, and the SDNPA encourages that this work be undertaken and agreed with stakeholders as soon as possible.</p> <p>The SDNPA remains open to reviewing any proposed methodology or boundary relating to setting. In support of this, and as requested, SDNPA has provided a couple of relevant Inspector's decisions where the concept of setting was clearly described and explained.</p>	<p>The geographical extent of the setting of the SDNP is not defined in any plan, legislation, or policy. Its setting is addressed in ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6) and ES Appendix 13.2 LVIA methodology, Volume II (Document reference 6.2, DCO Volume 6). Furthermore, the LVIA has identified the Local Landscape Character Areas (LLCA) within the study area which contribute, to varying extents, to the SDNPs setting.</p> <p>ES Appendix 13.3 Landscape and baseline effects, Volume II (Document reference 6.2, DCO Volume 6) describes each LLCA and explains where and to what extent it contributes to the setting of the SDNP. This appendix also identifies where construction and operation of the Project are likely to affect that setting.</p> <p>The Applicant and SDNPA have agreed the approach to defining and assessing the setting of the SDNP, including the identification of relevant landscape receptors and the method for determining landscape value. SDNPA confirmed that the revised methodology and the approach set out for ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6) address their previous concerns regarding clarity, spatial definition of setting, and policy application.</p>	<p>ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6).</p> <p>ES Appendix 13.2 LVIA methodology, Volume II (Document reference 6.2, DCO Volume 6).</p> <p>ES Appendix 13.3 Landscape and baseline effects, Volume II (Document reference 6.2, DCO Volume 6).</p>	Matter agreed with other party
SDNPA-2023-0008	Landscape and visual impact - methodology	<p>Currently it is not clear how the landscape or visual receptors have influenced the different aspects of the development's location or design, or how their presence has led to a particular change in decision. This relates to Policies within the SDLP and general good practice about iterating the design to minimise harm set out in GLVIA3. SDNPA will be seeking for the DCO to explain how negative effects upon both within the National Park and within its setting have first been avoided, then mitigated for, following the mitigation hierarchy. This requires an understanding of the landscape</p>	<p>The Applicant met in person with the SDNPA on 12 February 2024 to discuss the feedback provided on the LVIA methodology. The discussion focussed on the approach to defining and assessing impacts on the setting of the SDNP, the approach to assessing the value attached to the landscape and the threshold for valued landscape in the context of NPPF paragraph 187 and how the existing features of the landscape are considered in ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6).</p>	<p>ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6).</p>	Matter agreed with other party

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		and visual receptors. See Otterbourne Manor Medieval Moated Site – likely a highly sensitive historic landscape, adjacent to designated ancient woodland and within the setting of the National Park yet, one of the chosen locations for a compound. It's selection, and all of the effects of this will need to be demonstrated through the application.	The Applicant discussed further the viewpoints/ landscape receptors with SDNPA at a bilateral on 4 December 2024. The Applicant explained the approach to be taken in ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6) and SDNPA confirmed agreement with the approach.		
SDNPA-2023-0009	Landscape and visual impact - methodology	<p>SDNPA would consider given the very small area of National Park (NP) that it may be possible to include specific viewpoints for this part of the proposal. When refining the evidence and applying it:</p> <ul style="list-style-type: none"> <li>• Are these adequate to capture visual impact during construction and operation?</li> <li>• 5no. viewpoints in NP – is this enough to design-out visual impact in views from the NP? And to demonstrate adequately the effect, should it be made that the scheme has 'minor' or 'moderate' visual impacts from within the NP? Similarly within the setting.</li> <li>• Experience of compounds/AGP in sequence from NP? Or will it be possible to see many in one go during the construction phase for example? A number of these are located in Gateway locations into and out of the NP – how will their presence affect the quality and condition of this landscape and experience?</li> <li>• High points south of Twyford along; Watley Lane bridleway, Woodland Drove footpath, Hare Lane footpath...have these been visited and ruled out? It remains unclear – perhaps including some 'no views' would be a good idea to demonstrate consideration.</li> <li>• AGP – located at a very high point near Kimbers Copse (close to Upham in NP). How has the visual sensitivity of this location informed this siting?</li> <li>• 4no. AGP close together at gateway route into NP. Again sequential views of these – are they within the setting?</li> </ul>	<p>The Applicant and SDNPA have agreed the approach to viewpoint selection, landscape and visual receptor identification, and assessment of views from within the SDNP and its setting for ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6).</p> <p>SDNPA confirmed that the agreed methodology adequately addresses SDNPA previous concerns regarding viewpoint coverage, sequential views, sensitivity at high point and gateway locations, and how receptor sensitivity informs design and impact evaluation.</p>	ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6).	Matter agreed with other party
SDNPA-2023-0010	Landscape and visual impact - methodology	The assessment presents three scales of Landscape Character Assessment (LCA), offering a thorough understanding of context. However, many of the characteristics appear to be directly lifted from published LCA sources without critically evaluating whether they accurately describe the patterns of landscape elements, as defined. The SDNPA advises caution in accepting all published	The Applicant and SDNPA have agreed the methodology for identifying landscape and visual receptors, assessing landscape value, and defining the SDNP's setting for ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6). SDNPA confirmed that the revised approach provides the necessary critical review of published LCA's, clarifies	<p>ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6).</p> <p>ES Appendix 13.2 Landscape and Visual Impact Assessment</p>	Matter agreed with other party

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		LCA findings as definitive, noting that GLVIA3 requires a critical review—an essential step that currently seems absent. This review should identify which landscape elements, contributing positively to character, are directly or indirectly affected by the development, as these form the receptors. There is no clear evidence of fieldwork, ground-truthing, or supporting research such as historic map regression to inform receptor identification. For instance, references to medieval assert fields lack spatial clarity and assessment of potential impact. The SDNPA considers the receptor identification to be generic, which risks leading to an equally generic assessment of effects, making it difficult to determine appropriate mitigation or enhancement measures. While the broader context is acknowledged, the specific landscape elements affected by the proposal—i.e., the receptors—are not clearly identified. On value, the inclusion of a landscape function table is welcomed, and the separation of natural and cultural heritage adds clarity. However, the SDNPA seeks further explanation on how landscapes or elements forming the setting of the SDNP are valued and stresses the need for comprehensive evidence across the full definition of landscape to support value judgements.	receptor identification, and sets out an evidence-based method for valuing landscapes and elements contributing to the SDNP's setting.	Methodology, Volume II (Document reference 6.2, Volume 6).	
SDNPA-2023-0019	Landscape and visual impact - methodology	Characteristics have been lifted from published LCA evidence, however, many of these do not describe the patterns of elements as per the definition.	The Applicant has discussed and agreed the approach to assessing impacts on landscape character with the SDNPA, including the patterns of elements including trees, woodland and hedgerows. ES Appendix 13.3 Landscape and baseline effects, Volume II (Document reference 6.2, DCO Volume 6) describes each LLCA and where relevant the trees and hedgerows within the Order Limits that could be affected by the Project.	ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6).  ES Appendix 13.3 Landscape and baseline effects, Volume II (Document reference 6.2, DCO Volume 6).	Matter agreed with other party
SDNPA-2023-0020	Landscape and visual impact - methodology	Be wary of agreeing with all published LCA - it does not make these documents absolute, always right or applicable to a site.	The Applicant confirms the information within ES Appendix 13.3 Landscape and baseline effects, Volume II (Document reference 6.2, DCO Volume 6) has critically reviewed and considered the veracity of published LCAs through desktop research, and fieldwork.	ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6).  ES Appendix 13.3 Landscape and baseline effects, Volume II (Document reference 6.2, DCO Volume 6).	Matter agreed with other party
SDNPA-2023-0021	Landscape and visual impact - methodology	GLVIA3 asks for a 'critical review' – suggest this bit of the process is missing.	The Applicant confirms that the LVIA in ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6) has	ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6).	Matter agreed with other party

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			gone through a series of peer reviews within the Applicant's team of technical and legal experts.		
SDNPA-2023-0022	Landscape and visual impact - methodology	This review should determine which landscape elements (that contribute positively to character) are being affected directly or indirectly by the development. These are the Receptors.	The Applicant refers the SDNPA to ES Appendix 13.3 Landscape and baseline effects, Volume II (Document reference 6.2, DCO Volume 6).	ES Appendix 13.3 Landscape and baseline effects, Volume II (Document reference 6.2, DCO Volume 6).	Matter agreed with other party
SDNPA-2023-0024	Landscape and visual impact - methodology	There are some gaps in the evidence and a very generic approach to receptor identification. This will only lead to a very generic (i.e. unspecific) identification of effect, making it very difficult to determine appropriate mitigation or in the case of SDNP mitigation and enhancement.	The Applicant notes this comment which has been considered in ES Appendix 13.2 LVIA methodology, Volume II (Document reference 6.2, DCO Volume 6).	ES Appendix 13.2 LVIA methodology, Volume II (Document reference 6.2, DCO Volume 6).	Matter agreed with other party
SDNPA-2023-0025	Landscape and visual impact - methodology	Many described characteristics relate to the development site. It is clear broad context has been understood, but the identification of the individual elements of the landscape affected either directly or indirectly by this project – i.e. the receptors - are missing.	Within ES Appendix 13.3 Landscape and baseline effects, Volume II (Document reference 6.2, DCO Volume 6), individual elements of the landscape are addressed within natural heritage (ancient woodland, TPOs, hedgerows) as attributes of value. A full Tree survey was conducted through summer 2024 and found in ES Appendix 13.5 Arboricultural Impact Assessment, Volume II (Document reference 6.2, DCO Volume 6).	ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6).  ES Appendix 13.3 Landscape and baseline effects, Volume II (Document reference 6.2, DCO Volume 6).  ES Appendix 13.5 Arboricultural Impact Assessment, Volume II (Document reference 6.2, DCO Volume 6).	Matter agreed with other party
SDNPA-2023-0026	Landscape and visual impact - methodology	The assessment should play out if/how these landscape functions might be supported or prevented through the development.	The Applicant refers the SDNPA to ES Appendix 13.3 Landscape and baseline effects, Volume II (Document reference 6.2, DCO Volume 6).	ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6).  ES Appendix 13.3 Landscape and baseline effects, Volume II (Document reference 6.2, DCO Volume 6).	Matter agreed with other party
SDNPA-2023-0031	Landscape and visual impact - methodology	The methodology shared appears to be about assessing effects within the setting. It is the SDNPA's view that this process should be the same as anywhere, because it is the sensitivity and value of landscape elements and visual receptors that alters within designated landscapes or their setting, as implied by the NPPF/Technical Guidance Note.	The geographical extent of the setting of the SDNP is not defined on any plan, legislation or policy. Setting has been addressed in ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6) and ES Appendix 13.2 LVIA methodology, Volume II (Document reference 6.2, DCO Volume 6). Furthermore, the LVIA has identified the LLCAs within the study area which contribute to varying extents to its setting.	ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6).  ES Appendix 13.2 LVIA methodology, Volume II (Document reference 6.2, DCO Volume 6).	Matter agreed with other party

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		<p>SDNPA questions how the project can achieve NPPF 182 without knowing where the setting is and consider 'valued landscapes' in terms of the NPPF is there as a catch-all for the landscapes people value outside of designations.</p> <p>SDNPA therefore considers the status of the setting of the National Park is high and is therefore assumed to be a 'valued landscape'. As a result SDNPA don't support the 4-step NatureScot method for assessing effects in the setting, as the Special Qualities of the NP apply right across the designation – they're chosen because of their universality i.e. can be experienced in many parts of the NP, so a more specific approach is needed to draw out specific effects upon receptors (landscape elements) as per the definition. Nevertheless, these local elements have the potential to together contribute to the setting and/or Special Qualities.</p>	ES Appendix 13.3 Landscape and baseline effects, Volume II (Document reference 6.2, DCO Volume 6) describes each LLCA and explains where and to what extent it contributes to SDNP's setting. This appendix also identifies where construction and operation of the Project are likely to affect that setting.	ES Appendix 13.3 Landscape and baseline effects, Volume II (Document reference 6.2, DCO Volume 6).	
SDNPA-2023-0032	Landscape and visual impact - methodology	Receptors and Special Qualities work needs to be matched into any LVIA method.	<p>The Applicant confirms this is addressed in ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6) and in ES Appendix 13.2 LVIA methodology, Volume II (Document reference 6.2, DCO Volume 6).</p> <p>The LVIA includes a separate assessment of the likely effects on the purposes and special qualities of the SDNP. In the absence of specific guidance for England, the approach has been informed by the NatureScot Working Draft 11: Guidance for Assessing the Effects on Special Landscape Qualities.</p>	<p>ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6).</p> <p>ES Appendix 13.2 LVIA methodology, Volume II (Document reference 6.2, DCO Volume 6).</p>	Matter agreed with other party
SDNPA-2023-0033	Landscape and visual impact - methodology	<p>Clarity is needed about Valued Landscapes (re: NPPF), Landscape Value (re: GLVIA3) and Value attached to Landscapes which, appears to be about quality. SDNPA thinks this has become a bit more complicated than necessary. The different tiers of landscape identified by NPPF Policy are:</p> <ul style="list-style-type: none"> <li>National Park; Setting to Protected Landscapes; and Valued Landscapes.</li> </ul>	<p>The Applicant confirms this is addressed in ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6) and ES Appendix 13.2 LVIA methodology, Volume II (Document reference 6.2, DCO Volume 6).</p> <p>National designated landscapes, including SDNP and Chichester Harbour National Landscape, were automatically recognised as valued landscapes in the context of NPPF.</p>	<p>ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6).</p> <p>ES Appendix 13.2 LVIA methodology, Volume II (Document reference 6.2, DCO Volume 6).</p>	Matter agreed with other party
SDNPA-2024-SC-0002	Landscape and visual impact - methodology	<p>SDNPA reviewed Chapter 13 (Document reference 6.1, DCO Volume 6) and provided the following key comments:</p> <ul style="list-style-type: none"> <li>Inclusion of the European Landscape Convention definition is welcomed; cross-disciplinary links should be clarified in the Outline Environmental Management Plan.</li> </ul>	<p>As requested by the SDNPA, the definition of landscape character is now included in ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6).</p> <p>The viewpoints identified in the LVIA have also been classified, as requested, to indicate whether</p>	Outline LEMP (Document reference 7.5, DCO Volume 7).	Matter agreed with other party

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		<ul style="list-style-type: none"> <li>Final LVIA should clearly identify whether viewpoints are within, near, or outside the SDNP.</li> <li>Include a definition of landscape character.</li> <li>Reference South Downs National Park Authority Tranquillity Study (2017) and Dark Night Skies Technical Note (2021) in para 13.2.8.</li> <li>SDNP and its Special Qualities should not be treated as single receptors; use Local Landscape Character Areas (LLCAs) with clearer links between harm and mitigation.</li> <li>Add tranquillity mapping to Table 13-5.</li> <li>Expand on tranquillity as a perceptual quality in para 13.7.39, considering visual and auditory impacts.</li> <li>Clarify ambiguous language in para 13.7.153 regarding landscape patterns; ensure descriptions are rooted in landscape elements.</li> <li>Include impacts on rural lanes, tranquillity, and dark skies in para 13.8.5.</li> <li>Disagree with conclusion in Table 13-11 that there are no operational effects on SDNP setting: <ul style="list-style-type: none"> <li>Visibility splays, lighting, signage, and structural changes may erode landscape character.</li> <li>Hedgerow loss and woodland changes could affect field patterns and ancient woodland buffers.</li> <li>LLCA26 shows significant impact, which should reflect on SDNP setting.</li> <li>Recommend more nuanced assessment of mitigation before concluding no effect.</li> </ul> </li> </ul>	they lie within the designated area of the SDNP, within its setting, or outside both.		
SDNPA-2025-0006	Landscape and visual impact - mitigation	SDNPA asked that within 'GDP_2', the following wording be added "where appropriate" as screening is not always characteristic and could draw attention to a negative feature instead.	This change has now been reflected in GDP_1, which reads "...with high quality design (and screening such as by natural features where appropriate) ...", to provide the intended flexibility while maintaining design quality expectations.	Design Principles Document (Document reference 5.11, DCO Volume 5).	Matter agreed with other party
SDNPA-2023-0015	Landscape and visual impact - mitigation	SDNPA asks that both sets of evidence (landscape and visual) need to demonstrably do three things: <ul style="list-style-type: none"> <li>Determine the National Park's setting – so the NPPF test/other 'setting' policies can be addressed.</li> </ul>	The approach to defining the SDNP's setting was agreed with SDNPA. ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6), describes the setting of the Project with reference to the landscape character assessment.	ES Chapter 4 Consideration of alternatives, Volume I (Document reference 6.1, DCO Volume 6).	Matter agreed with other party

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		<ul style="list-style-type: none"> <li>Inform the route, compound and AGP location and design (for the areas within the National Park and its setting). Ultimately we need to see how harm to the setting has been avoided/ mitigated/ compensated.</li> <li>Assess the effects of the iterations and final proposal upon landscape and visual receptors.</li> </ul>	<p>Route, compound and AGP locations have been incorporated into LVIA Figures in ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6).</p> <p>Receptors are addressed both in ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6) and ES Chapter 4 Consideration of alternatives, Volume I (Document reference 6.1, DCO Volume 6).</p>	ES Chapter 13 Landscape and visual, Volume I (Document reference 6.1, DCO Volume 6).	
SDNPA-2025-0005	Landscape and visual impact - mitigation	SDNPA asked that 'GDP_7' be reinstated as rainwater harvesting at AGP where there is a landscape maintenance/management requirement should be included in the project.	This matter is now addressed within GDP_5, which states: <i>"To help reduce water consumption, the detailed design for the WRP site and AGPs should consider incorporating measures of sustainable water use."</i> The updated wording therefore encompasses rainwater harvesting within a broader sustainable water-use approach.	Design Principles Document (Document reference 5.11, DCO Volume 5).	Matter agreed with other party
SDNPA-2025-0003	Landscape and visual impact - mitigation	SDNPA asked that 'GDP_14' be reinstated as a draft Design Principle, arguing that determining species is a design choice not a management choice and therefore should not sit within the Outline LEMP (Document reference 7.5, DCO Volume 7).	Former GDP_14 has not been reinstated, as its content would duplicate measures already secured through the Outline LEMP (Document reference 7.5, DCO Volume 7), which specifies the habitat types to be delivered, together with the measures for their implementation and long-term management. The Contractor will develop the final species mix within the detailed LEMP(s) post-consent.	Design Principles Document (Document reference 5.11, DCO Volume 5).  Outline LEMP (Document reference 7.5, DCO Volume 7).	Matters subject to further discussion
SDNPA-2025-0004	Landscape and visual impact - mitigation	SDNPA state that green walls are required in the setting of SDNPA, therefore ask that within 'BPT-K_7', the following wording be added <i>"replicate grassland species on this wall"</i> .	BPT-K_7 was refined and reshared with SDNPA. It now confirms that consideration will be given to providing standalone green walls offset from the proposed buildings and structures facing the SDNP, with similar species to the grassland within Wintershill Parkland.	Design Principles Document (Document reference 5.11, DCO Volume 5).	Matters subject to further discussion
<b>Noise and vibration</b>					
SDNPA-2023-0013	Noise and vibration - assessment	The SDNP is an International Dark Night Skies Reserve with a number of ongoing programmes to get people into the National Park at night. Therefore night-time noise sensitivities should be assessed.	Dark night skies are identified as a sensitive receptor in ES Chapter 15 Noise and vibration, Volume I (Document reference 6.1, DCO Volume 6). All potential night-time noise sources associated with the Project are located more than 1km from the Dark Sky Core (E0), and over 2km from the Buffer Zone or Intrinsic Rural Darkness (E1a). Hence, significant effects on the Dark Night Sky Reserve are not anticipated.	ES Chapter 15 Noise and vibration, Volume I (Document reference 6.1, DCO Volume 6).	Matter agreed with other party
SDNPA-2022-0004	Noise and vibration - mitigation	The Noise and Vibration Outline Survey strategy does not factor in any monitoring for post-consent activities, which appears to include construction. SDNPA would expect some indication of the impact of construction, maintenance and demolition traffic be provided earlier than the examination.	The Noise and Vibration Outline Survey Strategy (Document reference 6.1, DCO Volume 6) sets out the monitoring undertaken to establish the baseline for the EIA. The feedback relates to post-consent monitoring of traffic impacts, which is outside the scope of this strategy. Construction noise emissions will be monitored, with procedures detailed in the Noise and Vibration	ES Chapter 15 Noise and vibration, Volume I (Document reference 6.1, DCO Volume 6).	Matter agreed with other party

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			Management Plan within the final Construction Environment Management Plan, to be prepared post-consent and agreed with relevant authorities prior to commencement of construction.		
<b>Socioeconomics, tourism, recreation, and health</b>					
SDNPA-2025-0008	Socioeconomics, Tourism, Recreation, and Health	SDNPA raised concerns about methodology and treatment of receptors within the National Park. SDNPA felt the methodology focussed too narrowly on people, overlooking the National Park's cultural, landscape, and ecological significance.	<p>The Applicant confirmed that SDNP receptors will be factored into sensitivity assessments, as part of ES Chapter 17 Socio-economics, tourism and health, Volume I (Document reference 6.1, DCO Volume 6).</p> <p>The Applicant shared an extract from ES Chapter 17 Socio-economics, tourism and health, Volume I (Document reference 6.1, DCO Volume 6) on 28th January 2026. Feedback noted that the extracts looked acceptable in isolation but confirmed that full feedback will only be provided once the entire chapter is reviewed as part of the DCO application.</p> <p>Matters subject to full review of ES Chapter 17 Socio-economics, tourism and health, Volume I (Document reference 6.1, DCO Volume 6) as part of the DCO application.</p>	ES Chapter 17 Socio-economics, tourism and health, Volume I (Document reference 6.1, DCO Volume 6).	Provisional agreement pending application evidence
<b>Traffic and transport</b>					
SDNPA-2024-0012	Traffic and transport	SDNPA raised a concern regarding the amount of construction traffic that is planned to be routed through Twyford and the extent to which the National Park has been considered as a receptor. The SDNPA also raised concern regarding the increase in construction traffic on the B3335 through Twyford on the associated Public Right of Way crossings.	<p>The Applicant confirms that this route has been agreed with HCC and is secured through the Framework Construction Traffic Management Plan (CTMP) (Document reference 7.2, DCO Volume 7).</p> <p>Of the 53 construction compounds, 10 would be accessed via Twyford, including L-1 to L10. This includes three site section compounds, with the remainder being trenchless crossing compounds. Alternative access routes that were considered and discounted included:</p> <ul style="list-style-type: none"> <li>Highbridge Road due to a height restriction at Allbrook (below railway).</li> <li>Fair Oak (B3354), Bishopstoke (B3037) and Eastleigh (A335) as this route would impact a significant number of residential receptors and the network is very congested.</li> <li>Whilst routing through Twyford would also impact some residential receptors, it was considered as the best overall option.</li> </ul> <p>With regards to construction traffic demand, HGV would route through Twyford for circa. two years</p>	<p>Framework CTMP (Document reference 7.2, DCO Volume 7).</p> <p>ES Appendix 18.1 Transport Assessment, Volume II (Document reference 6.2, DCO Volume 6).</p> <p>ES Appendix 13.3 Landscape and baseline effects, Volume II (Document reference 6.2, DCO Volume 6).</p>	Matters subject to further discussion

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			<p>(23 months), with an overall average of 36 daily HGVs (18 arrivals and 18 departures). This would equate to an 1.9% increase in HGVs routing on the B3354 through Twyford. Within the two-year period, there would be a four-month peak where there would be 112 daily HGVs (56 arrivals and 56 departures). This would equate to an 3.2% increase in HGVs routing on the B3354 through Twyford for a four-month period. It should be noted that most of these HGV movements would predominately be 10m rigid lorries, rather than the much larger 16.5m articulated lorries.</p> <p>The Framework CTMP (Document reference 7.2, DCO Volume 7) will include measures to reduce the impacts of HGVs on the transport network, including restrictions on movements during the network peak periods and the pick-up/drop-off times for Twyford School. Section 11 of ES Appendix 18.1 Transport Assessment, Volume II (Document reference 6.2, DCO Volume 6) includes an assessment of the forecast increase in traffic on the PRow crossings and concludes the impact would not be perceptible.</p> <p>With regards to the SDNPA being considered as a receptor, ES Appendix 13.3 Landscape and baseline effects, Volume II (Document reference 6.2, DCO Volume 6) includes an assessment of the likely impacts and effects on the designation. This includes relevant special qualities, including a qualitative assessment on the sense of tranquillity within the National Park from the increased perception of human activity through noise and visual disturbance due to the presence and operation of construction compounds, plant and vehicles and operations to remove existing vegetation. This concludes there would be temporary, reversible, moderate adverse effects, limited to the construction period.</p>		
SDNPA-2024-SC-0005	Traffic and transport - mitigation	Concerns about the effect of the Project would have on people accessing the SDNP through the Public Rights of Way (PRow) network and other cycleways/NMU provision.	Engagement with HCC and SDNPA has informed the scope of Appendix B Framework Rights of Way Management Plan to the Framework CTMP (Document reference 7.2, DCO Volume 7). There is broad agreement on the matters to be addressed within the initial Appendix B Framework Rights of Way Management Plan to the Framework CTMP (Document reference 7.2, DCO Volume 7) and those to be developed further in the detailed documents.	Appendix B Framework Rights of Way Management Plan to the Framework CTMP (Document reference 7.2, DCO Volume 7)	Provisional agreement pending application evidence

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			<p>The proposed management strategy for each individual PRow affected by the Project has been discussed with the relevant stakeholders and is reflected in the measures set out in Appendix B Framework Rights of Way Management Plan to the Framework CTMP (Document reference 7.2, DCO Volume 7).</p> <p>Matters subject to full review of Appendix B Framework Rights of Way Management Plan to the Framework CTMP (Document reference 7.2, DCO Volume 7) as part of the DCO application.</p>		
SDNPA-2024-SC-0007	Traffic and transport - mitigation	Further consideration of the effects of the proposed construction workers hub if either located within the SDNP, or if there is potential for traffic impacts within the SDNP due to the location of the hub.	<p>The Applicant is not identifying a site at this stage due to uncertainty in the timing and availability, but ES Chapter 18 Traffic and transport, Volume I (Document reference 6.1, DCO Volume 6) and ES Appendix 18.1 Transport Assessment, Volume II (Document reference 6.2, DCO Volume 6) includes an assessment of vehicle movements associated with the construction workers hub. The ES also confirms the construction workers hub would not be used to store materials, plant or other equipment. Additionally, the Framework Construction Worker Travel Plan (CWTP) (appended to the Framework CTMP, Document reference 7.2, DCO Volume 7) will cover all elements of the Project including the construction workers hub and the shuttle bus operation that will be implemented.</p> <p>The Applicant notes that the site chosen would have planning permission for a similar activity and therefore the effects associated with this will have already been considered through this planning permission. Additionally, it is unlikely that there will be a suitable site within the SDNP that already has consent and therefore no development is proposed within the SDNP.</p> <p>The Applicant is engaging closely with HCC on the construction workers hub, and whilst the approach to the assessment of movements is broadly agreed, this is subject to the review of ES Appendix 18.1 Transport Assessment, Volume II (Document reference 6.2, DCO Volume 6).</p> <p>Matters subject to full review of ES Chapter 18 Traffic and transport, Volume I (Document reference 6.1, DCO Volume 6) and the Framework CWTP (Document reference 7.2, DCO Volume 7) as part of the DCO application.</p>	<p>ES Chapter 18 Traffic and transport, Volume I (Document reference 6.1, DCO Volume 6).</p> <p>ES Appendix 18.1 Transport Assessment, Volume II (Document reference 6.2, DCO Volume 6).</p> <p>Framework CTMP Document reference 7.2, DCO Volume 7).</p>	Provisional agreement pending application evidence

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<b>Cumulative and in-combination effects</b>					
SDNPA-2023-0040	Cumulative effects - methodology	<p>SDNPA is concerned about the cumulative impact of multiple developments progressing simultaneously within the SDNP. SDNPA notes that it is important to acknowledge the cumulative visual impacts of multiple ongoing projects within/near the SDNP.</p> <p>SDNPA stressed that not only applications under EIA have impact on water quality, nature conservation and will be interested in more broader impacts to the National Park.</p>	<p>Following engagement with Local Planning Authorities on the cumulative effects assessment methodology and longlist and shortlist schemes, Southern Water reviewed the longlist to include major developments within 3km of the draft Order Limits, housing developments of at least 50 units, employment sites over 1,000sqm, emerging Development Plan Allocations within 3km, and other schemes suggested by Local Planning Authorities during engagement.</p> <p>The Applicant has engaged with SDNPA and sought agreement on ES Chapter 20 Cumulative and in-combination effects, Volume I (Document reference 6.1, DCO Volume 6). SDNPA has agreed that the longlist was appropriate as of May 2025 and that sufficient engagement has taken place.</p> <p>SDNPA has agreed with the sites/schemes that have been taken forward from the longlist to the shortlist in ES Appendix 20.1 List of 'other developments' – longlist and shortlist, Volume II (Document reference 6.2, DCO Volume 6).</p> <p>Due to the number of developments that have been identified for the longlist, ES Figure 20.1 Projects considered as part of the cumulative effects assessment - short list, Volume III shows only the location of those developments that have been shortlisted for the CEA (Document reference 6.3, DCO Volume 6). This approach has been considered acceptable by SDNPA.</p> <p>The Applicant confirmed that the details of the developments in the shortlist were set out in ES Appendix 20.1 List of 'other developments' – longlist and shortlist, Volume II (Document reference 6.2, DCO Volume 6).</p>	<p>ES Chapter 20 Cumulative and in-combination effects, Volume I (Document reference 6.1, DCO Volume 6).</p> <p>ES Appendix 20.1 List of 'other developments' – longlist and shortlist, Volume II (Document reference 6.2, DCO Volume 6).</p> <p>ES Figure 20.1 Projects considered as part of the cumulative effects assessment - short list, Volume III shows only the location of those developments that have been shortlisted for the CEA (Document reference 6.3, DCO Volume 6).</p>	Matter agreed with other party
<b>Multiple issues</b>					
SDNPA-2024-SC-0001	Terrestrial and freshwater ecology - mitigation	Concerns raised about potential impacts of the Project on the setting of the National Park and to have effects on biodiversity and access in relation to ES Chapter 8 Terrestrial and freshwater biodiversity, Volume I (Document reference 6.1, DCO Volume 6).	The Applicant has fully assessed terrestrial and freshwater biodiversity in ES Chapter 8 Terrestrial and freshwater biodiversity, Volume I (Document reference 6.1, DCO Volume 6), which informed the evaluation of impacts on SDNP Special Qualities in Table 0-1 of ES Appendix 13.3 Landscape and baseline effects, Volume II (Document reference 6.2, DCO Volume 6) including Special Quality 2 on wildlife and	ES Appendix 13.3 Landscape and baseline effects, Volume II (Document reference 6.2, DCO Volume 6).	Provisional agreement pending application evidence

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			<p>habitats. This covers impacts within the SDNP and its setting.</p> <p>Mitigation is secured in the Outline CEMP (Document reference 7.1, DCO Volume 7), the Design Principles Document (Document reference 5.11, DCO Volume 5), and the Outline LEMP (Document reference 7.5, DCO Volume 7).</p> <p>Matters subject to full review of the Outline CEMP (Document reference 7.1, DCO Volume 7) and Outline LEMP (Document reference 7.5, DCO Volume 7) as part of the DCO application.</p>	<p>Outline CEMP (Document reference 7.1, DCO Volume 7).</p> <p>Outline LEMP (Document reference 7.5, DCO Volume 7).</p> <p>Framework CTMP (Document reference 7.2, DCO Volume 7).</p> <p>Framework Construction Traffic Management Plan (Document reference 7.2, DCO Volume 7).</p> <p>ES Chapter 8 Terrestrial and freshwater biodiversity, Volume I (Document reference 6.1, DCO Volume 6).</p> <p>Design Principles Document (Document reference 5.11, DCO Volume 5).</p>	

## 4 Signatories

- 4.1.1 This SoCG is agreed between Southern Water Services Limited (the Applicant) and SDNPA on the date below.

Signed for SDNPA
Name
Position
Date
Duly authorised for and on behalf of SDNPA

Signed for Southern Water Services Limited
Name
Position
Date
Duly authorised for and on behalf of Southern Water Services Limited



from  
Southern  
Water. 

The logo graphic for Southern Water, featuring three stylized white waves of varying lengths, positioned to the right of the word "Water".