Hampshire Water Transfer and Water Recycling Project

National Policy Statement Accordance Table

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1 Introduction

1.1 Purpose of this document

1.1.1 The National Policy Statement for Water Resources Infrastructure (NPSWRI) was designated in 2023 and amended in July 2025. It is used as the primary basis for examination by the Examining Authority (ExA) and used for making decisions by the Secretary of State (SoS) in considering development consent applications for water infrastructure (including where development is treated as a development for which development consent is required through section 35 of the Planning Act). Section 1.5 of the Planning Policy Statement (PPS) (Document reference 5.5, DCO volume 5, Version 2) provides a more detailed description of the decision-making framework for the application.

1.1.2 The PPS (Document reference 5.5, DCO Volume 5, Version 2) provides a comprehensive analysis of the Project against the policies in the NPSWRI.

1.1.3 The Environmental Statement (ES) chapters [APP-080 – APP 100] also refer to NPSWRI policies where relevant to assessment in that particular chapter. Each chapter contains a table summarising relevant NPSWRI policies and where these are addressed in that chapter.

1.1.4 The Examining Authority (ExA) has requested that the Applicant provides a separate NPS Accordance Table which "*should provide details of the relevant NPSWRI paragraph reference, a summary of policy requirements and where that is addressed in the evidence".* As per the requested format - i.e. in the same format as table 10.2 of ES Chapter 10 [APP-089] - this represents a 'signposting' exercise to where the evidence on policy compliance is provided within the submission. This document does not seek to replicate detailed policy analysis and evidence already within the application submission.

1.1.5 The policy summaries provided in the second column of the tables are to provide a broad understanding of the matter that paragraph covers and should not be used in place of the full policy text in the NPSWRI itself.

1.1.6 Sections 1 and 2 of the NPSWRI provide an introduction and overview of Government policy and the need for water infrastructure respectively. Sections 3 and 4 then present the Assessment principles and Generic Impacts policies respectively. This document addresses every paragraph in Sections 3 and 4 of the NPSWRI and selected paragraphs from Sections 1 and 2 where appropriate (excluding paragraphs which, for example, only provide introductory context).

1.1.7 To provide a useful cross-referencing tool this document provides hyperlinks to the relevant application documents. This is not, however, possible where a document is also being updated at Deadline 1. The Applicant therefore intends to provide an updated Version of the document once each of the Deadline 1 documents have been accepted and added to the Examination Library.

2 Section 1 of the NPSWRI – Introduction

Table 2.1 Introduction (relevant paragraphs)

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
1.1.2	Confirms that the NPSWRI will be used as the primary basis for examination by the ExA and used for decision making by the SoS in considering development consent applications for water resources nationally significant infrastructure projects (NSIPs) (including references to projects of national significance designated under section 35).	Section 1.5 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) sets this in the context of the decision-making framework for the application and the effect of the NPSWRI in relation to section 104 of the PA2008.
1.1.4	Advises that where a water resources infrastructure development is treated as a development for which development consent is required through section 35 of the PA 2008 the National Policy Statement (NPS) will apply unless otherwise stated in the section 35 direction.	Paragraph 1.5.1 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) notes that there is nothing in the varied section 35 Direction that states otherwise and the NPSWRI therefore has effect for this application. Paragraph 1.5.8 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) notes that the NPSWRI will be utilised as the primary basis for examination by the ExA and decision making by the SoS.
1.1.9	Identifies other matters that the Examining Authority and the SoS may consider important and relevant to its decision-making which may include development	The role of local planning policy in DCO decision making is addressed at paragraphs 1.5.33 - 1.5.38 of the PPS

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	plan document. In the event of a conflict between documents the NPS should be prioritised.	(Document reference 5.5, DCO Volume 5, Version 2), in setting out the decision-making framework for the applicant.
1.4.6	States that, where a section 35 direction is made in relation to a project which has been identified as a preferred option in a final water resources management plan, the 'need' will not be revisited as part of the application for development consent.	The PPS (Document reference 5.5, DCO Volume 5, Version 2), explains that this paragraph does not currently apply to the Project as the Applicant's WRMP24 has not yet been published. As set out in the WRMP24 Position Statement [PDA-004], Defra has, however, now issued to Southern Water permission to publish its WRMP24 which it will do by 13 December 2026. Once WRMP24 is published paragraph 1.4.7 of the NPSWRI (see below) will no longer apply and paragraph 1.4.6 will have effect meaning the 'need' for the Project will not need to be revisited through examination.
1.4.7	States that where a section 35 direction is made for a project that is not present in a water resources management plan, development consent applicants will need to make the case for the need for the project on a case-by-case basis.	As set out in paragraph 1.5.14 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), until WRMP24 is published paragraph 1.4.7 of the NPSWRI will have effect. Accordingly, the Case for the Project (Document reference 5.6, DCO Volume 5, Version 2) sets out the need for the Project in detail at section 3.2. This is summarised at section 3.2 of the PPS (Document reference 5.5, DCO Volume 5, Version 2).

3 Section 2 of the NPSWRI – Government policy and the need for water resources

Table 3.1 Introduction (relevant paragraphs)

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
2.1.3	The NPSWRI identifies a 'critical and urgent need' to build resilience in the water sector to address pressures on water supplies and that the government's vision is a water industry that works for everyone providing reliable, robust services now and in the future, without compromising the needs of the environment.	Referenced in paragraph 3.2.2 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), at section 3.2 in setting out the chronology of government policy and strategy identifying the national need for new water infrastructure. Paragraph 4.2.3 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), references paragraph 2.1.3 in the NPSWRI setting out government policy and the need for water resources infrastructure.
2.2.13	Provides an example of the potential implications of failing to maintain water supplies in drought conditions – that if severe drought restrictions on use were put in place it would equate to an economic loss of around £1.3 billion per day across the country.	These NPSWRI paragraphs are referenced at section 4.2 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), in setting out the need for water resources infrastructure. Addressed in further detail in the Case for the Project (Document reference 5.6, DCO Volume 5, Version 2),
2.2.15	Highlights the impact of abstraction of water from the environment, in altering the natural flow regime and that levels of water abstraction will need to be reduced to protect the environment.	

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
2.3.1	Emphasises the need for a twin track approach to providing resilient water supplies, which requires both new water resources infrastructure and further action to reduce the demand for water.	
2.3.2	Notes that reducing leakage and water demand is an essential part of the solution but must be delivered alongside new sources of infrastructure to increase availability of supply.	
2.4.3	Requires that applications for development consent made before a WRMP is published should demonstrate how they have taken account of the National Framework.	This requirement is addressed at paragraph 4.2.8 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), by reference to the WRMP process.
2.5.12	Requires that when applying for development consent, the applicant must submit a statement with a clear assessment of the proposal in the context of the water resources management plan and summarise the results of the water resources management plan annual review process and anything relevant to the development consent application.	Paragraph 4.2.10 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), acknowledges the requirement of paragraph 2.5.12 of the NPSWRI. This requirement is satisfied by the Case for the Project (Document reference 5.6, DCO Volume 5, Version 2) sets which sets out the chronology of the Project through the WRMP process. .
2.5.20	Requires that the applicant should include in the statement in 2.5.12 planned financial arrangements,	Paragraph 4.2.11 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) notes this requirement to detail planned

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	also explaining how the proposed infrastructure delivers value for money by reference to the analysis in the water resources management plan.	financial arrangements and how the project will deliver value for money These requirements are addressed within the Funding Statement (Document reference 4.2, DCO Volume 4, Version 1) and section 4 of the Case for the Project (Document reference 5.5, DCO Volume 5, Version 2), respectively.

4 Section 3 of the NPSWRI - Assessment Principles

4.1 General principles of assessment

Table 4.1 General Principles of assessment

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
3.1.1	Outlines what section 3 (Assessment Principles) of the NPSWRI covers. It details the six principles an application for development consent should be examined against, in addition to explaining the guidance this section provides.	Paragraph 4.3.1 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), explains the contents of the Assessment Principles section in the NPSWRI and where it is addressed in the PPS.
3.1.2	Sets out the presumption in favour of granting development consent for water resources NSIPs, included in the need for infrastructure as stated by the NPS, is subject to policies and protections in the NPS and legal constraints set out in the planning act.	Paragraph 3.1.2 of the NPSWRI is referenced at paragraph 4.3.2 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), noting that there is a presumption in favour of granting development consent for water resources nationally significant infrastructure projects that fall within the need for infrastructure established in the NPS. Paragraph 7.1.1 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), also notes the presumption in favour in setting out the overall planning balance.
3.1.3	Identifies matters the examining authority and SoS should consider when weighing proposals. Namely, “benefits, including contribution to meeting identified	Paragraph 3.1.3 of the NPSWRI is referenced at Paragraph 4.3.3 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), noting the ExA and SoS are advised that when

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	water needs in a company's management plan, facilitation of economic development" and "adverse impacts, including long term and cumulative adverse impacts, any measures to avoid and reduce or compensate for adverse impacts."	considering and weighing adverse impacts against benefits to take into account potential benefits and adverse impacts. Paragraph 7.1.4 of the PPS details the benefits and adverse impacts the examining Authority and SoS should take into account. Paragraph 3.1.3 of the NPSWRI is also referred to in the summaries of national policy in: • ES Chapter 8 Terrestrial and freshwater biodiversity paragraph 8.2.4, Table 8-2 List of relevant national policy, (Document reference 6.1, DCO Volume 6, Version 1) which cross references to information in the ENG Statement [APP-427] and the Biodiversity Gain Plan [APP-426]. • ES Chapter 13 Landscape and visual, [APP-092], paragraph 13.2.4, Table 13-2 List of relevant national policy. • ES Chapter 20 Cumulative and in combination Effects, [APP-099], paragraph 20.2.2, Table 20-2 List of relevant national policy.
3.1.4	States that the SoS also needs to consider how the benefits are secured and the level of confidence in their delivery.	Paragraph 3.1.4 of the NPSWRI is referenced at paragraph 4.3.5 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) which signposts to section 4 of the Case for the Project (Document reference 5.6, DCO Volume 5, Version 2) which identifies the Project benefits and how these would be

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		secured through the DCO and the Guide to the Application (Document reference 1.3, DCO Volume 1, Version 5) which sets out the framework of control documents that would be secured by the DCO with reference to the proposed mechanisms set out in the draft DCO [APP-023]. The Project commitments and how they are secured are also set out within the Commitments Register at ES Vol II - ES Appendix 5.5 (Document Reference 6.2, DCO Volume 6, Version1). Paragraph 3.1.4 is also referred to in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) Paragraph 8.2.4, Table 8-2, List of relevant national policy – which cross references to information in the ENG Statement [APP-427] and the Biodiversity Gain Plan [APP-426].
3.1.5	Addresses the water resources management plan (WRMP) infrastructure options appraisal process and its ability to identify the best location of specific water supply infrastructure projects. It provides and explanation of Table 2, which demonstrates how the information from the WRMP plan is relevant to project level assessments.	Paragraph 3.1.5 of the NPSWRI is referenced at paragraph 4.3.6 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) addressing the WRMP options appraisal process.
3.1.6	Explains that section 1.4.6 states that NSIPs (defined by sections 27, 28 and 28A) are identified in the final	Paragraph 3.1.6 of the NPSWRI is referenced at paragraph 4.3.7 of the PPS (Document reference 5.5, DCO Volume 5,

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	WRMP and that these projects have previously been subjected to full options appraisal.	Version 2) noting that projects identified in a final WRMP will have undergone a full options appraisal in accordance with WRMP requirements, which forms the basis of any considerations for alternatives.
3.1.7	Describes the roles of the examining authority to recommend, and SoS to impose relevant requirements. Suggests guidance on the use of planning conditions should be considered	Paragraphs 3.1.7 and 3.1.8 of the NPSWRI are referenced in paragraph 4.3.8 and 4.3.9 of the PPS (Document reference 5.5, DCO Volume 5, Version 2). The proposed Requirements are set out within Schedule 2 of the draft DCO [APP-023]. Project benefits including the Skills and Employment Fund, Broadmarsh Coastal Park Improvement Fund, Portsdown Hill Improvement Fund and Community Fund would be secured by legal agreement.
3.1.8	Paragraph 3.1.8 gives the conditions under which development consent obligations under section 106 of the Town and Country Planning Act should be pursued	

4.2 Environmental Impact Assessment

Table 4.2 Environmental Impact Assessment

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
3.2.1	Explains which proposals should be supported by an ES.	Paragraph 3.2.1 of the NPSWRI is referenced in paragraph 4.3.10 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) and advises all proposals for projects subject to the infrastructure planning (Environmental Impact Assessment) Regulations 2017 must be accompanied by an ES (Document reference 6.1, DCO Volume 6, Version 1), describing the aspects of the environment likely to be significantly affected by the project.
3.2.2	Sets out the importance of considering the effects of climate change in aspects of the proposal due to the long-term nature of projects.	Paragraph 3.2.2 in the NPSWRI is referenced paragraph 4.3.11 of the PPS (Document reference 5.5, DCO Volume 5, Version 2). Paragraph 3.2.2 is also referenced in ES Chapter 10 Carbon and climate change [APP-089] paragraph 10.2.4, Table 10-2, and section 10.8 considers the potential effects of climate change on each phase through the Climate Change Resilience (CCR) assessment. Paragraph 3.2.2 is also referenced in ES Chapter 13 Landscape and visual [APP-092] paragraph 12.2.4, Table 13-2 List of relevant national policy.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
3.2.3	Explains the purpose of the EIA and the role of the Environmental Impact Assessment in dictating what should be included the ES and guidance they should refer to, especially when considering areas relevant to section 3 and 4.	Paragraph 4.3.12 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) refers to paragraphs 3.2.3 to 3.2.6 of the NPSWRI for context and confirming that these requirements are all addressed throughout the ES. ES Chapter 2 Planning legislation and policy [APP-081], Section 2.3.8 refers to these paragraphs of the NPSWRI when outlining the general principles for the EIA. Further reference is made at • ES Chapter 10 Carbon and climate change, [APP-089], paragraph 10.2.4, Table 10-2 List of relevant national policy which refers to the CCR assessment in section 10.8 of that chapter. • ES Chapter 13 Landscape and visual, [APP-092], Paragraph 12.2.4, Table 13-2 List of relevant national policy. • ES Chapter 20 Cumulative and in-combination effects [APP-099] paragraph 20.2.2 Table 20-2 List of relevant national policy. Section 20.7 considers cumulative effects.
3.2.4	Notes that information gathered from the water resource management plan options appraisal assessments or information contained within section 4 of the NPSWRI may be useful to identify the significant effects of the proposed project.	
3.2.5	Clarifies requirements need for environmental information that will be read by the examination authority. In the case of a DCO this should include whether monitoring measures should be implemented.	
3.2.6	Details what considerations must take place when thinking about cumulative effects. The paragraph notes that the examining authority may have already possess evidence regarding cumulative effects of developments which may inform SoS's decisions.	

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
3.2.7	Explains the examining authority's responsibility to consider cumulative impacts and not just the individual impacts of a development which may be acceptable.	Paragraph 3.2.7 in the NPSWRI is addressed in paragraph 4.3.13 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) noting, the requirement of the ExA to consider how significant cumulative effects and the interrelationship between effects might as a whole effect the environment, even when they are acceptable on an individual basis or with mitigation measures in place. ES Chapter 20 Cumulative and in combination Effects [APP-099], paragraph 20.2.2 Table 20-2. Section 20.7, ES Chapter 20 Cumulative and in-combination effects [APP-099], considers cumulative and in combination effects.
3.2.8	Recognises that it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail and explains what to do if details of the proposal haven't been finalised at the time of application.	Paragraph 3.2.8 and 3.2.9 in the NPSWRI are addressed in paragraph 4.3.14 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) which cross references to the parameters defined in ES Chapter 3 Description of the Proposed Development, [APP-082] and secured through the Works Plans [AS-007, AS-008 and APP-014] and Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1).
3.2.9	Instructs applicants to use the worst-case environmental effects in the environmental assessment should details be missing.	
3.2.10	Lists which details should be included regarding measures and monitoring discussed in the ES.	Paragraph 3.2.10 in the NPSWRI is addressed at paragraph 4.3.16 of the PPS (Document reference 5.5, DCO Volume 5, Version 2). Mitigation measures are

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		identified in the ES and where these measures are secured is recorded in the Commitments Register at ES Vol II - ES Appendix 5.5 (Document Reference 6.2, DCO Volume 6, Version 1).
3.2.11	Provides instruction on how to proceed in the situation the SoS grants development consent despite unfinished details. Further instructions are provided for applicants who want to proceed with construction outside the consented terms with reference to the planning act.	Paragraph 3.2.11 in the NPSWRI is addressed in paragraph 4.3.15 of the PPS (Document reference 5.5, DCO Volume 5, Version 2). The need for approval of details post consent (as referenced in paragraph 3.2.11) are set out and secured within Schedule 2 of the draft DCO [APP-023].
3.2.12	Provides guidance on what information to provide when an EIA is not undertaken and ES not needed.	NPSWRI paragraph 3.2.12 relates to cases where the EIA Regulations do not apply and is not therefore applicable to this Project

4.3 Habitats Regulations Assessment

Table 4.3 Environmental Impact Assessment

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
3.3.1	The Habitat Regulation Assessment undertaken at the WRMP optional appraisal stage may contribute to the information of the SoS to discharge their functions as the competent authority	Paragraph 4.3.20 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), notes the requirement for applicants to provide information on protected sites to allow the SoS to discharge its function as competent authority and cross refers to the Habitats Regulations Assessment - Stage 2 Appropriate Assessment and Marine Conservation Zone - Stage 1 Assessment (Document reference 5.2, DCO volume 5, Version 2) ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1), Table 8-2, List of relevant national policy also cross refers to the Habitats Regulations Assessment – Stage 2 Appropriate Assessment and Marine Conservation Zone – Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2
3.3.2	Where no adverse effects on site integrity cannot be determined Imperative Reasons of Overriding Public Interest can be applied. Assessments and appraisals required are detailed along with the potential consideration whether public interest overrides identified adverse effects.	Paragraphs 3.3.2 to 3.36 of the NPSWRI are addressed in paragraph 4.3.20 – 4.3.25 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) with reference to the Habitats Regulations Assessment - Stage 2 Appropriate Assessment and Marine Conservation Zone -

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
3.3.3	Provides requirements pertaining compensatory measures needed to ensure maintenance where an IROPI is being pursued.	Stage 1 Assessment (Document reference 5.2, DCO volume 5, Version 2).
3.3.4	Suggests actions to complete to reduce the risk of delays in determining Development Consent Orders by providing sufficient information on legal financial and technical plans with proposed monitoring. Development consent order articles, requirements or conditions may be used in a deemed marine licence to accommodate compensatory measures.	
3.3.5	Matters detailed in the National Policy Statement are relevant in the detailed design stage and further on in the process to identify any alternative routes and IROPI.	
3.3.6	Lists the reasons and grounds an IROPI case should be based on to override public interest, if the development negatively impacts any priority natural habitats or species. The competent authority should only rely on other imperative reasons of overriding public interest if it has obtained an opinion from the appropriate authority.	

4.4 Environmental Net Gain

Table 4.4 Environmental Net Gain

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
3.4.1	Briefly describes the purpose of environmental net gain and its relation to biodiversity net gain. Consideration and incorporation of improvements in natural capital, ecosystem services and benefits when planning delivery of BNG is advised.	Paragraph 4.3.26 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 3.4.1 when introducing section 3.4 of the NPSWRI. Paragraph 3.4.1 is also referenced in • ES Chapter 8 Terrestrial and freshwater biodiversity, (Document reference 6.1, DCO Volume 6, Version 1), Paragraph 8.2.4, Table 8-2, List of relevant national policy. This cross refers information in the ENG Statement [APP-427] and the Biodiversity Gain Plan [APP-426]. • ES Chapter 9 Marine Biology, (Document reference 6.1, DCO Volume 6, Version 1), Paragraph 9.2.4, Table 9-2, List of relevant national policy. • ES Chapter 13 Landscape and Visual, [APP-092], Paragraph 12.2.4, Table 13-2 List of relevant national policy.
3.4.2	Recognises the potential of water resources infrastructure projects to provided benefits and enhancements that result in wider environmental net gains. The Environment Agency's and Ofwat's	Paragraph 4.3.27 in the PPS (Document reference 5.5, DCO Volume 5, Version 2), references paragraph 3.4.2 of

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	guidance inform water resources management plans option appraisal, which is subject to a statutory environmental assessment.	the NPSWRI in relation the potential for benefits beyond BNG. Paragraph 3.4.2 is also referenced in: • ES Chapter 9 Marine Biology, Paragraph 9.2.4, Table 9-2, List of relevant national policy (Document Reference 6.1, DCO Volume 6, Version 1). • ES Chapter 13 Landscape and Visual, [APP-092], Paragraph 12.2.4, Table 13-2 List of relevant national policy.
3.4.3	States developments have the potential to provide environmental net gains prioritised by local authorities and national policies, a statement showing the consideration and incorporation of opportunities into the development should be included. Recommendations of Guidance and tools have been made followed by the instruction to provide references to supplementary information where environmental net gain considerations are already detailed as part of the strategic options appraisal process in the WRMP.	Paragraph 3.4.3 in the NPSWRI is referred to in paragraph 4.3.28 and 4.3.29 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), in relation to BNG development ENG considerations with cross reference to the Environmental Net Gain Statement [APP-427]. Paragraph 3.4.1 is also referenced in • ES Chapter 8 Terrestrial and freshwater biodiversity, (Document reference 6.1, DCO Volume 6, Version 1), paragraph 8.2.4, Table 8-2, List of relevant national policy – which cross refers to the ENG Statement [APP-427]. • ES Chapter 9 Marine Biology, (Document reference 6.1, DCO Volume 6, Version 1),

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		Paragraph 9.2.4, Table 9-2, List of relevant national policy. • ES Chapter 13 Landscape and Visual, [APP-092], Paragraph 12.2.4, Table 13-2 List of relevant national policy.
3.4.4	Notes that section 4 of the NPSWRI provides guidance on the impacts of new water resources infrastructure and references the NPPF and that opportunities are identified in a number of sectors relating to enhancement, protection and mitigation measures.	Paragraph 3.4.4 is referenced in ES Chapter 9 Marine Biology, (Document reference 6.1, DCO Volume 6, Version 1) Paragraph 9.2.4, Table 9-2, List of relevant national policy.

4.5 Assessing Alternatives

Table 4.5 Assessing Alternatives

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
3.5.1	Requires applications to comply with the legal obligations and policy set out in the NPS in relation to the assessment of alternatives	Paragraphs 4.3.30, 4.3.33 and 4.3.35 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) address the requirements of NPSWRI paragraph 3.5.1 relating to alternatives namely: • As required by the EIA Regulations with reference to ES Chapter 4 Consideration of Alternatives [APP-083] • Other specific legal obligations which, if engaged, require the consideration of alternatives, with reference to the requirements of the Conservation of Habitats and Species Regulations 2017 and under the Water Environment Regulations (WER) 2017 (Water Framework Directive) (England and Wales) neither of which are engaged for the Project. Also refers to the Statement of Reasons [APP-025] in relation to compulsory acquisition. • Any policies in the NPSWRI which require the consideration of alternatives (which the PPS lists at paragraph 4.3.35).
3.5.2	Notes that information from the WRMP options appraisal process will be relevant to demonstrate how	Paragraph 3.5.2 is referenced at paragraphs 4.3.36 – 4.3.38 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) in relation to the Applicant's WRMP process

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	alternatives have been considered insofar as required by paragraph 3.5.1	and in turn refers to the Scheme Development Report [APP-073] - [APP-075] and ES Chapter 4 Consideration of Alternatives, [APP-083].
3.5.3	Advises that the consideration of alternatives, as required under the EIA Regulations, must begin in the earliest stages of scheme evolution and starting point for the assessment of alternatives under the EIA Regulations should be a review of the optioneering carried out for the regional and WRMP processes.	Paragraph 4.3.39 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), addresses paragraph 3.5.3 of the NPSWRI with reference to the Applicant's WRMP 19 and emerging WRMP24 with cross reference to ES Chapter 4 Consideration of alternatives, [APP-083].

4.6 Criteria for Good Design for Water Resources Infrastructure

Table 4.6 Criteria for Good Design for Water Resources Infrastructure

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
3.6.1	Good design is an important factor of sustainable development. The paragraph list how good design can help make the process of development more efficient and the importance of being clear about design. The value of engagement with communities and local councils is also touched upon.	Paragraph 4.3.43 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) and table 4-1: *'Assessment of the NPSWRI design criteria, summarises the good design criteria'* set out how the Project has responded to the design criteria at paragraphs 3.6.1 to 3.6.3 of the NPSWRI and having regard to the detail in the Design Approach Document [APP-077] to [APP-079]. The NPSWRI policies on good design are also referenced in: • ES Chapter 2 Planning legislation and policy [APP-081] Section 2.3.10, notes the criteria of good design water resource infrastructure is subject to. • ES Chapter 13 Landscape and Visual [APP-092] Paragraph 12.2.4, Table 13-2 List of relevant national policy.
3.6.2	Paragraph 3.6.2 notes how the management structure of projects can enable good design and maximise the value provided by the project. The identification of design principles should be completed from the outset directing the development throughout the process. NSIPs covered by the PPS face different design challenges and will be required to incorporate engineering, safety and operational considerations.	
3.6.3	Advises on possible opportunities for applicants to demonstrate good design relevant to site layout, measures for existing landscape and historical character or function, landform, landscape permeability and integration of biodiversity and nature conservation interests.	
3.6.4	Instructs applicants to provide information regarding how the design process was conducted, the evolution of the proposed design considering the design code	The requirements of paragraph 3.6.4 are addressed at paragraphs 4.3.44 to 4.3.50 of the PPS (Document

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	used and justification for the selected design should also be included. The examining authority and SoS will give weight to standards which the design has to satisfy.	reference 5.5, DCO Volume 5, Version 2) with reference to: • the Design Approach Document [APP-077] to [APP-079]. • the Scheme Design Report APP-073 to APP-075 • Statements of Common Ground with the Environment Agency and Natural England (Document reference 5.8, DCO Volume 5, Version 1)

4.7 Climate Change and Adaptation

Table 4.7 Climate Change and Adaptation

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
3.7.1	The Planning Act requires a National Policy Statement to explain the reasons for its policies and how those policies address government climate change objectives, including both adaptation and mitigation. This section focuses on climate change adaptation	Paragraphs 4.3.52 to 4.3.54 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), address climate change adaptation and mitigation. The Climate Change Resilience assessment (CCR) within section 10.8 of ES Chapter 10 Carbon and climate change [APP-089] considers the resilience of the Proposed Development to climate change. The CCR assessment evaluates the resilience of the Proposed Development to climate change during the construction, operation and decommissioning phases.
3.7.2	The Planning Act requires the SoS to consider the desirability of adapting to climate change when designating a National Policy Statement.	
3.7.3	This paragraph explains how the NPS implements government policy on climate change and how the SoS will take into account the effects of climate change when considering NSIPs. The Environmental improvement plan presents the government's commitment the possible extent of climate change is considered. The paragraph highlights the importance of adaption measures and details the impacts and risks including pressure on water supply	
3.7.4	Longterm investments remaining operational over many decades must factor in impacts of climate change during each stage. Section 4 identifies specifies where climate change adaptation should be incorporated.	The requirement to consider the impacts of climate change at different stages of the Proposed Development has been compiled within the CCR assessment in section 10.8 of ES Chapter 10 Carbon and climate change [APP-089]. Paragraph 4.3.54 of the

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		PPS (Document reference 5.5, DCO Volume 5, Version 2), reiterates this requirement.
3.7.5	Requires the consideration of various potential impacts of climate change using the latest UK planning practice guidance on climate change allowances and identifying mitigation measures over the infrastructure's life span. Instructions are provided should a new set of climate projections be released.	Paragraph 4.3.55 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 3.7.5 of the NPSWRI. The Climate Change Resilience assessment (CCR) within section 10.8 of ES Chapter 10 Carbon and climate change [APP-089] considers the resilience of the Proposed Development to climate change.
3.7.6	Covers the circumstances in which the apply high emissions scenarios and credible maximum allowances (H++) emissions scenarios should be utilised. This will help applicants take a risk aversion approach. Further instruction directs applicants to use the latest climate change projections.	The high emission scenario has been complied in the CCR assessment in section 10.8 of ES Chapter 10 Carbon and climate change [APP-089]. Paragraph 4.3.56 to 4.3.58 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), address these requirements with reference to: • ES Chapter 10 Carbon and climate change, [APP-089] - the requirement to consider the high emission scenario at different probability levels as stated in paragraph 3.7.6 of the NSPWRI has been complied with in the CCR assessment in section 10.8 of that chapter. • The Operational Environmental Management Plan [APP-422]

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
3.7.7	Adaptation measures should be based on the latest sets of available information. Any adaptation measures must be assessed, setting out how and where measures are proposed to be secured.	As stated in paragraph 4.3.59 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), the project has been designed to be resilient to climate change and therefore no additional adaptation measures are required and paragraphs 3.7.7 to 3.7.10 are not engaged.
3.7.8	Any refence to the UK Climate change risk assessment means the most recent Version of the document.	
3.7.9	Paragraph 3.7.9 refers to the Climate Change Act 2008 when addressing consequential impacts as a result of adaption measures. In this case the SoS will consider the impact in relation to the application.	
3.7.10	States that adaptation measures can be required to be implemented at the time of construction.	
3.7.11	Should necessary adaptation measures have adverse impact on other aspects of the development the SoS may require the applicant to ensure the adaptation measure when it is needed rather than from the outset.	Paragraph 4.3.60 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), confirms – with reference to the Preliminary Flood Risk Assessment (FRA) ES Appendix 19.1 Flood Risk Assessment, [APP-189] - [APP-196] paragraph 3.7.11 of the NPSWRI is not engaged.

4.8 Environmental Regulation

Table 4.8 Environmental Regulation

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
3.8.1	Impacts relating to emissions, discharges, noise, water, land, air quality or the marine environment may be regulated under the pollution control framework or consenting and licensing regimes. Any required permissions must be obtained before regulated activities commence, and applicants should seek pre-application advice from the relevant consenting authority.	Paragraph 4.3.61 of the PPS (Document reference 5.5, DCO Volume 5 Version 2) introduces section 3.8 of the NPSWRI in relation to permits and consents that may be required for water resources projects consented separately under other regulatory regimes. Details of other consents and licenses are included within the Other Consents and Licenses position Statement [APP-055]. Table 11-2, List of relevant national policy, of ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1) also refers to paragraph 3.8.1 of the NPSWRI in setting out engagement with the Environment Agency and other stakeholders which is an ongoing process.
3.8.2	Water resources NSIPs are likely to require multiple consents or be subject to separate regulatory regimes, such as the Reservoirs Act 1975. Typical consents include abstraction licences, impoundment licences, environmental permits for discharges and approvals for flood risk activities.	Paragraphs 4.3.65 and 4.3.66 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) outline the other consents sought separately to the DCO with reference to the Other Consents and Licenses position Statement [APP-055].

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
3.8.3	The Examining Authority and Secretary of State should focus on whether the development is an acceptable use of the land, and on the impacts of that use, rather than the control of processes, emissions or discharges themselves. The Secretary of State should assess the potential impacts of processes, emissions or discharges to inform decision making, but should work on the assumption that, in terms of the control and enforcement, the relevant pollution control or other consenting regime will be properly applied and enforced. Decisions under the Planning Act should complement but not duplicate those taken under the relevant pollution control regime.	Paragraph 3.8.3 of the NPSWRI is referenced at paragraph 4.3.62 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), in setting the context for the relationship of other regulatory regimes with the Planning Act 2008. Paragraph 3.8.3 of the NPSWRI was discussed at the Issue Specific Hearing 1 [EV5-002] in the context of the 'Gateshead principle'.
3.8.4	The application of these conditions apply in an analogous way to other environmental regulatory regime, including those on land drainage and flood defence and biodiversity.	The application submission does not specifically reference paragraph 3.8.4 of the NPSWRI although the Applicant notes this point as a matter of fact.
3.8.5	When applying for an Environmental Permit, applicants must demonstrate compliance with permit requirements. The Examining Authority may seek the views of the relevant regulator, such as the Environment Agency or local authority, on permit requirements and associated management plans when considering project impacts.	Para 4.3.62 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) introduces the requirement of NPSWRI paragraph 3.8.5 and then addresses it at paragraph 4.3.64 with reference to the Statement of Engagement [APP-072] which, sets out the engagement with stakeholders.
3.8.6	Applicants are encouraged to start pre application discussions with the Environment Agency as early as	Paragraph 4.3.64 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) outlines pre application

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	possible. Where a Development Consent Order (DCO) and Environmental Permit are being progressed together, the Environment Agency advises starting permit work at least six months before submitting the DCO application to ensure environmental issues are properly addressed and advice can be provided to the Examining Authority.	discussions with the Environment Agency with reference to the Statement of Engagement [APP-072]. Details of engagement with the Environment Agency are also provided in the Draft Statement of Common Ground - Environment Agency (Document reference 5.8, DCO Volume 5, Version 2). Table 11-2, List of relevant national policy, of ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1) also refers to paragraph 3.8.6 of the NPSWRI in setting out engagement with the Environment Agency and other stakeholders which is an ongoing process.
3.8.7	Applicants have a statutory duty to consult the Marine Management Organisation (MMO) on NSIPs affecting relevant marine areas under the Planning Act, as amended by the Marine and Coastal Access Act 2009. The SoS's consent may include a deemed marine licence, with the MMO advising on the conditions that should apply.	Paragraph 4.3.65 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) introduces the approach for seeking a single consenting approach for certain permits including any requirement for a licence under the Marine and Coastal Access Act 2009 for works within the marine environment through a deemed Marine Licence. The Explanatory Memorandum [APP-024] explains that the dDCO [APP-023] makes provision for a deemed marine licence relating to the SuDS outfall at the proposed WRP site at Article 47. Details of discussions with the MMO are set out in the Draft Statement of Common Ground - Marine

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		Management Organisation (Document reference 5.8, DCO Volume 5, Version 1)
3.8.8	The SoS must be satisfied that development consent can be granted having fully considered environmental effects. This requires close cooperation with bodies including the Environment Agency, Marine Management Organisation, Natural England, Internal Drainage Boards, and water and sewerage undertakers to ensure pollution, cumulative environmental effects and flood risk impacts can be adequately regulated and managed.	Paragraph 4.3.63 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) notes this requirement and paragraph 4.3.64 makes reference to the pre application engagement with the relevant stakeholders as detailed in the Statement of Engagement [APP-072].
3.8.9	The SoS should not refuse development consent because of impacts controlled through separate regulatory regimes unless there is a strong reason to believe that the necessary permits, licences or consents would not subsequently be granted.	Paragraph 4.3.68 (Document reference 5.5, DCO Volume 5, Version 2), notes this requirement and paragraph 4.3.67 of the PPS notes that the Other Consents and Licences Position Statement [APP-055] provides a more detailed description and a position status for each secondary consent and licence. As discussed in the [EV5-004] and the Environment Agency SoCG (Document reference 5.8, DCO Volume 5, Version 2) the Environment Agency confirm there is no reason to believe that discharge permits for WRP and HTR will not be granted.

4.9 Common Law Nuisance and Statutory Nuisance

Table 4.9 Common Law Nuisance and Statutory Nuisance

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
3.9.1	Refers to Section 158 of the Planning Act and its applicability to an order granting development consent. This defence does not diminish responsibilities under Part III of the Environmental Protection Act 1990.	Paragraph 4.3.69 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), states as a result of the conclusions drawn in the Statutory Nuisance Statement [APP-054], there is no need for any contrary provisions to be included in any DCO that is made by the SoS.
3.9.2	During examination Possible sources of nuisance under section 79(1) of the Environmental Protection Act 1990 should be considered by the examining authority. the mitigation and limiting of sources should also be considered so requirements can be recommended to the SoS.	Paragraph 4.3.70 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), notes that the Statutory Nuisance Statement [APP-054] concludes that with the implementation of mitigation measures set out in the Outline Construction Environmental Management Plan (CEMP) (Document reference 7.1, DCO Volume 7, Version 1) [APP-413 - APP414].Operational Environmental Management Plan (OEMP) [APP-422] and Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) statutory nuisance is not anticipated during construction, operation and maintenance of the Project. Table 15-5 of ES 15 Chapter Noise and vibration [APP-094] also refers to paragraph 3.9.2 with reference section 15.4 of that chapter.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
3.9.3	The defence of statutory authority is subject to contrary provision from the contrary provision of SoS by an order granting development consent.	Paragraph 4.3.69 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), states as a result of the conclusions drawn in the Statutory Nuisance Statement [APP-054], there is no need for any contrary provisions to be included in any DCO that is made by the SoS.

4.10 Safety

Table 4.10 Safety

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
3.10.1	Paragraph 3.10.1 sets out that relevant bodies, for example, local planning authorities and the Health and Safety Executive (HSE) should be consulted, where required, on matters relating to safety.	Paragraph 4.3.72 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), states engagement on matters of safety were undertaken through a Resilience EIA Working Group (as detailed in ES Chapter 14 Major accidents and disasters, Volume 1 [APP-093]. Paragraph 3.10.1 is also referenced in Table 14-2 of ES Chapter 14 Major accidents and disasters [APP-093] which confirms that the project does not contain any parts which would fall within the scope of the COMAH Regulations 2015. See paragraph 14.3.7, and ES Appendix 14.1 Stage 2 risk assessment [APP-177]. ES Chapter 17 Socio-economics, tourism and health (Document Reference 6.1, DCO Volume 6, Version 1), Table 17-2 refers to the Consultation Report [APP-029] in relation to consultation with the HSE.
3.10.2	Lists provisions under the Reservoirs Act 1975 that could be considered by the examining authority. The Act promotes the safety of large reservoirs and can be applied to reservoirs covered by the NPS.	Paragraph 4.3.80 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), states paragraphs 3.10.2 and 3.10.3 relate to new reservoirs covered by the NPSWRI and are not directly relevant to this application because the Applicant is not seeking to

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
3.10.3	States that guidance has been provided for reservoir owner and operators.	construct or operate a new reservoir under the scope of this DCO application.
3.10.4	Advises that matters of safety need to be considered early within the design process and "structural design aspects relating to safety should not be compromised when balanced against other design considerations."	Paragraph 4.3.77 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), notes that paragraph of the NPS is reflected in Section 4 of the Design Approach Document [APP-077] - [APP-079]
3.10.5	Sets out the requirement to consider the implications of major accidents or disasters under the Environmental Impact Assessment Regulations.	Paragraph 3.10.5 is referred to in Table 14-2 of ES Chapter 14 Major accidents and disasters [APP-093]. This requirement has been addressed throughout the chapter, especially in paragraph 14.3.7, and ES Appendix 14.1 Stage 2 risk assessment [APP-177].
3.10.6	Sets out details the powers water companies possess under the Water Industry Act 1991 to introduce bylaws, which could address operational issues relating to Public safety, access and security facilities	Paragraph 3.10.6 is referred to in Table 14-2 of ES Chapter 14 Major accidents and disasters [APP-093]. This requirement has been addressed throughout the chapter, especially in paragraph 14.3.7, and ES Appendix 14.1 Stage 2 risk assessment, Volume 2 [APP-177]. Section 17.8, ES Chapter 17 socio-economics, tourism and health , (Document reference 6.1, DCO Volume 6, Version 1), considers community safety during operation of the development.

4.11 Security Considerations

Table 4.11 Security Considerations

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
3.11.1	Paragraph 3.11.1 states that national security considerations apply across all national infrastructure. Defra's role and responsibilities as the sector sponsor department is detailed as well as their work with the Centre for the Protection of National Infrastructure.	Paragraph 4.3.81 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), notes the role of Defra as sponsor department for the water sector with responsibility for security matters. Paragraph 3.11.1 of the NPSWRI is also referred to in ES Chapter 14 Major accidents and disasters [APP-093], paragraph 14.2.4, Table 14-2, and the policy requirement has been addressed in paragraph 14.3.11.
3.11.2	The role of government policy is to make sure proportionate protective security measures are implemented in new infrastructure projects at early stages in development. Security consideration is likely to apply to infrastructure projects with development consent acquired under the national policy statement.	Paragraph 4.3.82 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) notes the advice at paragraph 3.11.2 of the NPSWRI. Paragraph 3.11.2 is referred to in ES Chapter 14 Major accidents and disasters, [APP-093], Paragraph 14.2.4, Table 14-2, and the policy requirement has been addressed in paragraph 14.3.11.
3.11.3	Identification of national security implications requires consultations with Defra to ensure measures have been sufficiently considered in the design process and management of security risks have been considered. Should Defra decide that the guidance has been sufficiently considered, the examining authority will	Paragraph 4.3.84 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), notes the requirements of paragraph 3.11.3 of the NPSWRI with reference to the Applicant's consultation with Defra via the Drinking Water Inspectorate in relation to security.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	receive confirmation meaning no further consideration to details regarding security measures is needed.	Paragraph 3.11.2 is referred to in ES Chapter 14 Major accidents and disasters, [APP-093] Paragraph 14.2.4, Table 14-2, and the policy requirement has been addressed in paragraph 14.3.11.
3.11.4	This paragraph provides instruction on what to do if Water resources infrastructure is in the vicinity of an existing ministry of defence site. This involves the consultation of the Ministry of defence to ascertain whether their activities will be adversely impacted or if impact can be sufficiently minimised through mitigation agreed on by the ministry of Defence. Evidence of this consultation must be presented to the examining authority.	Paragraph 4.3.85 notes the requirements of paragraph 3.11.4 of the NPSWRI and outlines the pre application discussions held with the Ministry of Defence at paragraphs 4.3.86 and 4.3.87. Paragraph 3.11.2 is referred to in ES Chapter 14 Major accidents and disasters, [APP-093], Paragraph 14.2.4, Table 14-2, and the policy requirement has been addressed in paragraph 14.3.11 [APP-093].
3.11.5	Paragraph 3.11.5 states that applicants should include only necessary security related information allowing the examining authority to examine and make an informed recommendation on the application.	Paragraph 3.11.2 is referred to in ES Chapter 14 Major accidents and disasters, [APP-093], paragraph 14.2.4, Table 14-2, and the policy requirement has been addressed in paragraph 14.3.11.
3.11.6	Should the case contain information about defence that would not be in the national interest to be made public, an examiner may be appointed by the SoS and will consider the evidence in a closed session.	Paragraph 3.11.2 is referred to in ES Chapter 14 Major accidents and disasters, [APP-093], paragraph 14.2.4, Table 14-2, and the policy requirement has been addressed in paragraph 14.3.11.

4.12 Health

Table 4.12 Health

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
3.12.1	Water resources infrastructure can affect health, wellbeing and quality of life both directly and indirectly. Direct impacts may arise from factors such as traffic, noise, vibration, air quality, emissions, light pollution, community severance, dust, odour, water pollution, hazardous waste and pests.	Paragraph 4.3.88 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), notes the content of paragraph 3.12.1 of the NPSWRI. Paragraph 3.12.1 is referenced in Table 17-2 of ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1) , and the policy requirement is addressed in the health assessment in section 17.8, with effects considered during construction, operation and decommissioning.
3.12.2	Water resources infrastructure can also have indirect health impacts by influencing access to public services, transport, walking and cycling opportunities, and recreational open space. However, developments may also provide indirect positive health benefits through employment opportunities and, particularly in the case of reservoirs, enhanced recreational facilities.	Paragraph 3.12.2 is referenced in Table 17-2 of ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1) and the policy requirement is addressed in the health assessment in section 17.8, with effects considered during construction, operation and decommissioning.
3.12.3	Where a project is likely to have significant environmental effects on the human population or health, the applicant should identify and assess these likely significant health impacts.	Paragraph 4.3.89 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), notes paragraph 3.12.3 and refers to consideration of the potential health impacts of the Project have been within ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1).

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		Section 17.8, ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1) covers the health assessment, effect of which are considered throughout the development's life span. Topics relevant to health are mentioned in the following ES Chapters: • Section 6.8 of ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1). • Section 11.8 of ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1). • Section 12.8 of ES Chapter 12 Land use and agriculture [APP-091], • Section 13.8 of ES Chapter 13 Landscape and visual [APP-092], • Section 15.8 of ES Chapter 15 Noise and vibration [APP-094], • Section 18.8 of ES Chapter 18 Traffic and transport [APP-097], • ES Chapter 20 Cumulative and in-combination effects [APP-099].

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
3.12.4	Applicants, the Examining Authority and the SoS should consider the cumulative effects of a development on health. Applicants should identify measures to avoid, reduce or compensate for adverse health impacts and seek opportunities to deliver health-related enhancements where appropriate.	Paragraph 3.12.4 is referenced in Table 17-2 of ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1). As noted at paragraphs 4.3.93 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), Cumulative effects of the Project with other developments in relation to health are considered within ES Chapter 20 Cumulative and in-combination effects [APP-099] As noted at paragraphs 4.3.94 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), the Equalities Impact Assessment [APP-428] (EQIA) assesses the potential effects of the construction, operation and decommissioning of the Project for people who share protected characteristics, as defined in the Equality Act 2010 including their health.

5 Section 4 of the NPSWRI – Generic Impacts

5.1 Overview

Table 5.1 Overview

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
4.1.1	This section addresses the potential construction and operational impacts of water resources infrastructure, setting out the assessments applicants must undertake and the planning requirements that must be satisfied to obtain development consent.	Paragraph 4.1.1 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) introduces that Section 4.4 of the PPS addresses the generic impact policies set out in Section 4 of the NPS.
4.1.2	The following sections outline many of the potentially significant impacts associated with water resources infrastructure. However, decision makers need to consider other relevant impacts not specifically covered by the National Policy Statement (NPS). The government's Planning Practice Guidance (PPG) may provide additional guidance on generic impacts.	
4.1.3	Although the National Policy Statement applies only in England, impact assessments must consider any effects on the devolved administrations. Where projects involve cross-border connections, applicants should engage with devolved administrations, relevant	

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	regulatory bodies, and follow the arrangements set out in Section 1.2.	
4.1.4	Robust decision making depends on the provision of sufficient and relevant information, particularly for formal assessments such as Environmental Impact Assessments (EIA), Habitats Regulations Assessments (HRA), FRAs, and transport assessments. To minimise delays, applicants should agree information requirements with the Planning Inspectorate, statutory consultees, and other relevant organisations at an early stage. Assessments should be informed by the latest available data and guidance.	
4.1.5	The Environment Act 2021 introduced 13 legally binding environmental targets for England listed in this paragraph. The SoS must consider duties under the Environment Act 2021 and have regard to the policies contained in the government's Environmental Improvement Plan when making decisions affecting the natural environment.	Paragraph 4.1.2 and 4.1.3 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), references the 12 environmental targets in line with paragraph 4.1.5 of the NPS.

5.2 Air Quality

Table 5.2 Air Quality

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
Introduction		
4.2.1	Introductory paragraph providing reference to policies and strategies including the Clean Air Strategy (2029) and Air Quality Strategy (2023)	Paragraph 4.2.1 is referenced in the PPS (Document reference 5.5, DCO Volume 5, Version 2), paragraph 4.4.5 noting emissions can be produced by water resources infrastructure. Table 6-2 of ES Chapter 6 Air Quality and Odour (Document reference 6.1, DCO Volume 6, Version 1) notes that assessment of likely significant effects associated with the Proposed Development is set out in section 6.8. Details of design, mitigation and monitoring are summarised in sections 6.4 and 6.9 of that chapter.
4.2.2	Air quality effects on wildlife and biodiversity are assessed in accordance of the policies relating to biodiversity and nature conservation (in section 4.3 of the NPSWRI)	Paragraph 4.2.2 of the NPSWRI is referenced by the PPS (Document reference 5.5, DCO Volume 5, Version 2), in paragraph 4.4.6 which discusses the effect or air quality on wildlife and biodiversity. Assessment of terrestrial and freshwater and marine biodiversity provided in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) and ES Chapter 9 Marine Biodiversity (Document reference 6.1, DCO Volume 6,

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		Version 1) respectively. This is also cross referenced in ES Chapter 6 Air Quality and Odour (Document reference 6.1, DCO Volume 6, Version 1) which considers the air quality effects on ecological receptors.
Applicant's Assessment		
4.2.3	Applicants should seek to minimise air pollutant emissions as much as reasonably practicable through the design of the proposed scheme.	Paragraph 4.2.3 of the NPSWRI is referenced in paragraph 4.4.7 in the PPS (Document Reference 5.5, DCO Volume 5, Version 2) in relation the reduction of air pollution and emissions. The PPS (Document reference 5.5, DCO Volume 5, Version 2), also references paragraph 4.2.4 of the NPSWRI identifying where air quality considerations are most likely to be relevant. Table 6-2 of ES Chapter 6 Air Quality and Odour (Document reference 6.1, DCO Volume 6, Version 1) notes that assessment of likely significant effects associated with the Proposed Development is set out in section 6.8. Details of design, mitigation and monitoring are summarised in sections 6.4 and 6.9 of that chapter. Details of design, mitigation and monitoring are summarised in sections 6.4 and 6.9 of ES Chapter 6 Air quality and odour, (Document reference 6.1, DCO Volume 6, Version 1). The Chapter is supported by ES Appendices 6.1 to 6.8, [APP-109] - [APP-116].
4.2.4	The NPSWRI identifies at paragraph 4.2.4 where air quality considerations are likely to be particularly relevant (namely where development is proposed in or adjacent to an AQMA, or any road links exceeding limit values according to Defra's assessments, or near to densely populated areas, where they may have potential impacts on habitats sites or near an education or healthcare site.	

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
4.2.5 4.2.6	Paragraph 4.2.5 lists points that should be included in and described by the ES. Paragraph 4.2.6 addresses future national projections of air quality based on estimates of future levels of emissions, traffic and vehicle fleet published by Defra. The applicants assessment should be consistent with this but may include more detailed modelling to demonstrate local impacts and other forms of assessment demonstrating the development does not jeopardise statutory targets.	Paragraph 4.4.8 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), references paragraphs 4.2.5 and 4.2.6 of the NPSWRI noting the requirements for the applicant's assessment, compiled through the assessment presented in ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1) Sections 6.4, 6.9 and 6.8. Table 6-2 of ES Chapter 6 Air Quality and Odour (Document reference 6.1, DCO Volume 6, Version 1) notes that the requirements of NPSWRI paragraph 4.2.5 are addressed throughout the chapter. ES Chapter 20 Cumulative and in combination Effects, [APP-099], paragraph 20.2.2 Table 20-2 List of relevant national policy.
Mitigation		
4.2.7	Paragraph 4.2.7 of the NPSWRI states that where there is a potential breach of any relevant statutory air quality limits or statutory air quality objectives, or if there is potential for the ability of a non-compliant area to achieve compliance or impede meeting national statutory targets, then the applicant should secure appropriate mitigation, to ensure that any statutory air quality limits and statutory air quality objectives are not	The air quality considerations noted at paragraph 4.2.7 are set out in Table 4-2 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), with commentary on whether they are applicable to the Project. The assessment of likely significant effects associated with the Proposed Development is set out in section 6.8 of ES Chapter 6 Air Quality and odour (Document reference 6.1, DCO Volume 6, Version 1). Details of design, mitigation and monitoring are summarised in

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	breached and sufficient consideration of targets is made. Paragraph 4.2.7 then notes the circumstances in which air quality considerations are likely to be particularly relevant.	sections 6.4 and 6.9. The Chapter is supported by ES Appendices 6.1 to 6.8, [APP-109] - [APP-116].
4.2.8	Paragraph 4.2.8 advises the SoS that in considering proposed mitigation measures, they may refer to the conditions and advice in any relevant air quality plan, or local Air Quality Action Plan	Paragraphs 4.4.13 to 4.4.14 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), summarise the primary and tertiary measures embedded in the project. These measures are also outlined within ES Chapter 6 Air quality and odour, (Document reference 6.1, DCO Volume 6, Version 1). and the outline CEMP (Document reference 7.1, DCO Volume 7, Version 1) [APP-413 and APP-414]]. The assessment of likely significant effects associated with the Proposed Development is set out in section 6.8 of ES Chapter 6 Air Quality and (Document reference 6.1, DCO Volume 6, Version 1). Details of design, mitigation and monitoring are summarised in sections 6.4 and 6.9. The Chapter is supported by ES Appendices 6.1 to 6.8, [APP-109] - [APP-116].
4.2.9	Paragraph 4.2.9 notes that "*reductions in air emissions might be achieved through consideration of design and layout; the technologies employed; and energy use. Reductions in exposure can be achieved through consideration of the development location, layout (i.e. avoiding trapping pollution between buildings) and potentially, through placement of barriers between receptors and sources of pollution".*	
Decision making		
4.2.10	Paragraph 4.2.10 of the NPSWRI requires the SoS to take into account the presence of AQMAs, or any road	Addressed at paragraph 4.4.15 of the PPS (Document reference 5.5, DCO Volume 5, Version 2)., noting the

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	links (exceeding limit values according to Defra's assessments) and national air quality targets.	requirement on the SoS to take into account the presence of AQMAs, or any road links 9exceeding limit values according to Defra's assessments) and national air quality targets. The assessment of likely significant effects associated with the Proposed Development is set out in section 6.8 of ES Chapter 6 Air Quality and odour (Document reference 6.1, DCO Volume 6, Version 1). Details of design, mitigation and monitoring are summarised in sections 6.4 and 6.9. The Chapter is supported by ES Appendices 6.1 to 6.8, [APP-109] - [APP-116].
4.2.11 4.2.12	Paragraph 4.2.11 of the NPSWRI states that ethe SoS should consider air quality impacts over the wider area that is likely to be affected in addition to the vicinity of the proposed development. Relevant statutory air quality limits and objectives, including dutues and the targets under the Environment Act 2021 must be taken into account and regard had to policies in the governments environmental Improvement Plan. The SoS must be satisfied the scheme is designed to minimise air pollutant emissions. Paragraph 4.2.12 of the NPSWRI states that where relevant, the SoS should be satisfied with the mitigation measures proposed by the applicant for construction and operational emissions and that residual effects are appropriate. The construction management plan	Addressed at paragraphs 4.4.16 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), which notes the requirement of the SoS to be satisfied the applicant has designed the scheme to minimise air pollutant emission and mitigation measures for construction and operational emissions are appropriate and residual effects acceptable. Paragraph 4.4.17 of the PPS refers to ES Chapter 6 (Document reference 6.1, DCO Volume 6, Version 1) which concludes the construction phase would not lead to any significant residual effects with proposed mitigation measures detailed in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1)

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	secured through a development consent order requirement will provide mitigation measures.	[APP-413 - APP414]. This is secured by a requirement in Schedule 2 of the draft DCO [APP-023]. The assessment of likely significant effects associated with the Proposed Development is set out in section 6.8 of ES Chapter 6 Air Quality and odour (Document reference 6.1, DCO Volume 6, Version 1). Details of design, mitigation and monitoring are summarised in sections 6.4 and 6.9. The Chapter is supported by ES Appendices 6.1 to 6.8, [APP-109] - [APP-116].
4.2.13 4.2.14	Paragraphs 4.2.13 and 4.2.14 apply to decision making where there are instances of significant adverse air quality impact, which are therefore not relevant to the determination of this DCO application.	Paragraph 4.4.18 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), notes that these NPSWRI paragraphs only apply to decision making where there are instances of significant adverse air quality impacts. This means they are not relevant to the determination of this DCO application

5.3 Biodiversity and Nature Conservation

Table 5.3 Biodiversity and Nature Conservation

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
Introduction		
4.3.1	Biodiversity encompasses all forms of life, including plant and animal species and the ecosystems they support. Government policy for the natural environment is set out in the Environmental Improvement Plan, which aims to enhance biodiversity through healthy, resilient ecosystems and stronger ecological networks. Geological conservation concerns sites designated for their geological and geomorphological importance.	Introductory paragraph not specifically referenced in the PPS (Document reference 5.5, DCO Volume 5, Version 2). Paragraph 4.3.1 is referenced in ES Chapter 8 Terrestrial and freshwater biodiversity, (Document reference 6.1, DCO Volume 6, Version 1), paragraph 8.2.4, Table 8-2, List of relevant national policy – which cross refers to the Biodiversity Gain Plan [APP-426].
4.3.2	The SoS should take account of the objectives of the Environmental Improvement Plan, including any relevant measures and statutory targets established under the Environment Act 2021 or other legislation.	Paragraph 4.4.21 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.3.2 of the NSPWRI when acknowledging the Environmental Improvement Plan, its measures and targets. Paragraph 4.3.2 is also referenced at ES Chapter 8 Terrestrial and freshwater biodiversity, (Document reference 6.1, DCO Volume 6, Version 1) paragraph 8.2.4, Table 8-2, List of relevant national policy.
4.3.3	The wide range of legislative provisions that can impact on planning decisions affecting biodiversity and	Paragraph 4.4.21 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), notes paragraph

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	geological conservation issues are set out in Planning Practice Guidance.	4.3.3 of the NSPWRI in referencing the guidance in the PPG on the natural environment last updated in June 2025.
4.3.4	Development of water resources infrastructure could have both adverse and beneficial impacts on biodiversity and nature conversation interests during construction and operational phases, and that the plan level HRA undertaken for WRMPs and site specific HRA should identify likely significant effects and necessary mitigation measures.	Paragraph 4.4.19 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) references the HRA for the Applicant's WRMP19 and emerging WRMP24. Paragraph 4.4.20 references the Habitats Regulations Assessment – Stage 2 Appropriate Assessment and Marine Conservation Zone – Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2) which provides this project specific assessment. Paragraph 4.3.4 is also referenced in ES Chapter 8 Terrestrial and freshwater biodiversity, (Document reference 6.1, DCO Volume 6, Version 1) paragraph 8.2.4, Table 8-2, List of relevant national policy.
Applicant's Assessment		
4.3.5	Where a project requires an Environmental Impact Assessment (EIA), the ES should identify likely significant effects on internationally, nationally, and locally designated ecological and geological sites, including sites outside England. It should also assess impacts on protected species, priority habitats, and species of principal importance for biodiversity	Paragraph 4.4.22 of PPS (Document reference 5.5, DCO Volume 5, Version 2), references paragraph 4.3.5 of the NPSWRI and the requirement to comply with it. Paragraph 4.3.5 of the NPSWRI is aksi referenced in • ES Chapter 8 Terrestrial and freshwater biodiversity, (Document reference 6.1, DCO

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	conservation, considering the full range of effects on ecosystems.	Volume 6, Version 1), paragraph 8.2.4, Table 8-2 which notes that the assessment of likely significant effects on terrestrial and freshwater biodiversity associated with the Proposed Development is set out in section 8.8. Primary and tertiary mitigation is set out in section 8.4 and secondary mitigation and enhancement is set out in section 8.9. • ES Chapter 9 Marine biodiversity, (Document reference 6.1, DCO Volume 6, Version 1), paragraph 9.2.4 Table 9-2. • ES Chapter 11 Land quality and ground conditions, (Document reference 6.1, DCO Volume 6, Version 1), paragraph 11.2.4, Table 11-2 and further addressed in sections 11. 5, 11.7 and 11.8. No designated geological sites are located at or within 250m of the Order Limits. As such, an assessment of the potential impacts to these features has not been undertaken.
4.3.6	Applicants should demonstrate how the project has taken opportunities to conserve and enhance biodiversity and geological conservation interests.	Paragraph 4.3.6 of the NPSWRI is referenced in paragraph 4.4.24 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) in relation to opportunities to conserve and enhance biodiversity. Environmental Mitigation and Enhancement Areas (EMEA) are shown on the Works Plans Works Plans

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		[AS-007, AS-008 and APP-014] and specific measures and commitments to mitigation within the EMEAs are included within the DPD (Document reference 5.11, DCO Volume 5, Version 1). Paragraph 4.3.6 of the NPSWRI is also addressed in: • ES Chapter 8 Terrestrial and freshwater biodiversity, paragraph 8.2.4, Table 8-2, (Document reference 6.1, DCO Volume 6, Version 1), section 8.8 covering the assessment of likely significant effects, section 8.4 addressing primary and tertiary mitigation and section 8.9 covering secondary mitigation, monitoring and enhancement. • ES Chapter 9 Marine biodiversity, (Document reference 6.1, DCO Volume 6, Version 1), paragraph 9.2.4 Table 9-2, references paragraph 4.3.6 of the NPSWRI. The paragraph is further referenced in section 9.4 of ES Chapter 9 Marine biodiversity (Document reference 6.1, DCO Volume 6, Version 1), section 9.8 which provides an assessment of likely effects which impacts all parts proposed below the MHWS and section 9.9 which discusses mitigation and monitoring or marine biodiversity.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		• Paragraph 4.3.6 of the NPSWRI is referenced in the ES Chapter 11 Land quality and ground conditions, (Document reference 6.1, DCO Volume 6, Version 1), paragraph 11.2.4, Table 11-2 and further addressed in sections 11. 5, 11.7 and 11.8.
Mitigation		
4.3.7	Applicants should include appropriate mitigation measures as a vital part of proposed development detailing where and how they will be secured. Paragraph 4.3.7 includes a criteria on what should be demonstrated.	Paragraph 4.3.7 in the NPSWRI is referenced in paragraphs 4.4.25 and 4.4.26 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) in relation to biodiversity mitigation considerations. This sets out where measures are secured and provides a demonstration of accordance with each of the 4.3.7 criteria within Table 4-3. Paragraph 4.3.7 of the NPSWRI is also addressed in: • ES Chapter 8 Terrestrial and freshwater biodiversity, (Document reference 6.1, DCO Volume 6, Version 1), paragraph 8.2.4, Table 8-2, section 8.8 covering the assessment of likely significant effects, section 8.4 addressing primary and tertiary mitigation and section 8.9 covering secondary mitigation, monitoring and enhancement. • ES Chapter 9 Marine biodiversity, (Document reference 6.1, DCO Volume 6, Version 1),

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		paragraph 9.2.4 Table 9-2, references paragraph 4.3.7 of the NPSWRI. • ES Chapter 11 Land quality and ground conditions, (Document reference 6.1, DCO Volume 6, Version 1), paragraph 11.2.4, Table 11-2 and further addressed in sections 11. 5, 11.7 and 11.8.
Decision making		
4.3.8	Government biodiversity policy is set out in the Environmental Improvement Plan and the UK Marine Strategy. These seek to halt biodiversity loss, support healthy ecosystems, and create stronger ecological networks. Achieving these objectives is particularly important in addressing climate change, as resilient ecosystems are better able to adapt to climate impacts. Failure to do so could result in significant harm to biodiversity and ecosystem services.	Paragraph 4.3.8 of the NPSWRI is referenced in paragraph 4.4.27 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) about the government's policy for biodiversity noting that the paragraph does not provide any specific tests for individual projects.
4.3.9	The SoS should consider imposing requirements or securing planning obligations to ensure that mitigation measures and biodiversity net gain (BNG) commitments are delivered and maintained. Habitat creation and enhancement associated with biodiversity net gain should be secured for the long term.	Paragraph 4.3.9 of the NPSWRI is referenced in paragraph 4.4.28 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), noting the SoS should consider what appropriate requirements should be attached to any consent and/or in any planning obligations entered into, in order to ensure any mitigation or biodiversity net gain measures are secured delivered and maintained. The Applicant's

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		approach to delivering BNG is set out in the Biodiversity Gain Plan [APP-426].
4.3.10	The SoS should take account of mitigation measures agreed between the applicant and organisations such as Natural England and the Marine Management Organisation (MMO), including whether relevant licences, such as protected species mitigation licences, have been granted or refused. For cross-border effects, Natural Resources Wales and NatureScot should also be consulted.	Paragraph 4.3.10 of the NPSWRI is referenced in paragraph 4.4.29 of the PPS (Document reference 5.5, DCO Volume 5, Version 2 for context. Paragraph 4.4.30 of the PPS refers to pre application engagement with the relevant bodies.
4.3.11	Subject to the specific policies that follow, development should avoid causing significant harm to biodiversity and geological conservation interests and should deliver biodiversity net gains.	Paragraph 4.3.11 of the NPSWRI is referenced in paragraph 4.4.31 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) and then addressed at paragraphs 4.4.32 – 4.4.34. Paragraph 4.3.11 of the NPSWRI is also referenced in the ES Chapter 11 Land quality and ground conditions, (Document reference 6.1, DCO Volume 6, Version 1), paragraph 11.2.4, Table 11-2 and further addressed in section 11.7.
4.3.12	The SoS should give appropriate weight to internationally, nationally, and locally designated sites, protected species, and habitats and species important for biodiversity and geological conservation. If significant biodiversity harm cannot be avoided,	Paragraph 4.3.35 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), provides an assessment against Paragraph 4.3.12 of the NPSWRI with reference to ES Chapter 8 Terrestrial and freshwater biodiversity, (Document reference 6.1, DCO Volume 6, Version 1) and ES Chapter 9

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	adequately mitigated, or compensated for as a last resort, development consent may be refused.	Marine biodiversity, (Document reference 6.1, DCO Volume 6, Version 1).
4.3.13	The highest level of biodiversity protection applies to sites designated under international conventions. Statutory protection for habitat sites is provided through the Habitats Regulations (see Section 3.3). Protected habitats may include qualifying features of sites designated under the Habitats Regulations and international conventions such as Ramsar sites.	Paragraph 4.3.13 of the NPSWRI is referenced in paragraph 4.4.37 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), noting that the highest level of biodiversity protection is afforded to sites identified sites identified through international conventions and the Habitats Regulations (considered under the Assessment Principles section) provide statutory protection for habitat sites. It acknowledged that certain habitats may be qualifying features of sites designated under Habitats Regulations and international conventions. Paragraph 8.7.4 of ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) lists the international designated sites either within 2km of the Order Limits The requirements of the Habitats Regulations are addressed in the Habitats Regulations Assessment - Stage 2 Appropriate Assessment and Marine Conservation Zone - Stage 1 Assessment (Document reference 5.2, DCO volume 5, Version 2). ES Chapter 9 Marine biodiversity, (Document reference 6.1, DCO Volume 6, Version 1), paragraph

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		9.2.4 Table 9-2, also references paragraph 4.3.13 of the NPSWRI.
4.3.14	Many Sites of Special Scientific Interest (SSSIs) are also internationally designated and receive corresponding protection. SSSIs that do not have international designations, and features not covered by such designations, should still receive strong protection because of their national significance. All National Nature Reserves (NNRs) are also designated as SSSIs.	Paragraph 4.3.14 of the NPSWRI is referenced in Paragraph 4.4.39 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), noting that many SSSIs are also designated as sites of international importance and will be protected accordingly and those not covered by international obligation will still be given a high degree of protection due to their national significance. ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) identifies and assesses potential impacts on these identified SSSIs ES Chapter 9 Marine biodiversity, (Document reference 6.1, DCO Volume 6, Version 1), paragraph 9.2.4 Table 9-2 references paragraph 4.3.14 of the NPSWRI. Paragraph 4.3.14 of the NPSWRI is also referenced in the ES Chapter 11 Land quality and ground conditions, (Document reference 6.1, DCO Volume 6, Version 1), paragraph 11.2.4, Table 11-2 and section 11.7.
4.3.15	Where a development is likely to have a significant adverse effect on an SSSI, either alone or in	Paragraph 4.3.15 of the NSPWRI is addressed at paragraphs 4.4.42 – 4.4.43 of the PPS (Document

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	combination with other developments, consent should normally be refused. An exception may only be justified where the benefits of the development clearly outweigh the harm to the site's special scientific interest and the wider SSSI network. The SoS must also be satisfied that measures to mitigate harm and, where possible, conserve and enhance biodiversity and geological interests are acceptable, with planning obligations or requirements used where necessary to secure delivery.	reference 5.5, DCO Volume 5, Version 2) noting that the advice to not grant a project that is likely to have a significant adverse effect on an SSSI is not engaged as there are no reported significant adverse effects in relation to SSSIs. ES Chapter 9 Marine biodiversity, (Document reference 6.1, DCO Volume 6, Version 1), paragraph 9.2.4 Table 9-2, references paragraph 4.3.15 of the NPSWRI. ES Chapter 20 Cumulative and In combination Effects, [APP-099], paragraph 20.2.2 Table 20-2 List of relevant national policy references paragraph 4.3.15 of the NPSWRI which is further addressed in section 20.7, which considers cumulative effects. Paragraph 4.3.15 of the NPSWRI is referenced in the ES Chapter 11 Land quality and ground conditions, (Document reference 6.1, DCO Volume 6, Version 1), paragraph 11.2.4, Table 11-2 and 11.7
4.3.16	Marine Conservation Zones (MCZs), designated under the Marine and Coastal Access Act 2009, protect marine species, habitats, and geological or geomorphological features. Conservation objectives and protected features are set out in the designation order, which provides statutory protection. Management measures are implemented by the Marine Management Organisation (MMO) and other relevant bodies. The	Paragraph 4.3.16 of the NPSWRI is addressed at paragraphs 4.4.44 – 4.4.4 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), confirming that MCZs introduction under the Marine and Coastal Access Act 2009 are areas that have been designated for specific purposes. The SoS, bound by the duties imposed by sections 126 and 126 of the Marine and Coastal Access Act 2009, is required to

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	SoS must comply with the duties contained in sections 125 and 126 of the Marine and Coastal Access Act 2009.	ensure the project will enable the MMO to exercise their functions and further conservation objectives, avoiding authorising activities which could hinder conservation objectives. ES Chapter 9 Marine biodiversity, (Document reference 6.1, DCO Volume 6, Version 1), paragraph 9.2.4 Table 9-2, also references paragraph 4.3.16 of the NPSWRI.
4.3.17	Regional and local biodiversity and geological designations, including Local Geological Sites, Local Nature Reserves (LNRs), Local Wildlife Sites, and Nature Improvement Areas, contribute to national biodiversity objectives, community wellbeing, research, and education. The SoS should ensure these sites are considered and safeguarded. However, these designations alone should not prevent necessary infrastructure development where impacts cannot be avoided or adequately mitigated, provided appropriate compensatory measures are secured.	Paragraph 4.3.17 of the NPSWRI is addressed at paragraph 4.4.46 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), stating that sites of regional and local biodiversity and geological interest (including local geological sites, local nature reserves and local wildlife sites and nature improvement areas) have an important role in meeting national biodiversity goals and targets, contributing to the quality of life and wellbeing of the community and supporting research and educations. Whilst the SOS should give considerations to such regional or local designations to ensure their safeguarding they should not be used themselves as a reason for refusal given the need for new infrastructure. ES Chapter 9 Marine biodiversity, (Document reference 6.1, DCO Volume 6, Version 1), paragraph

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		9.2.4 Table 9-2, references paragraph 4.3.17 of the NPSWRI. Paragraph 4.3.17 of the NPSWRI is also referenced in the ES Chapter 11 Land quality and ground conditions, (Document reference 6.1, DCO Volume 6, Version 1), paragraph 11.2.4, Table 11-2 and section 11.7.
4.3.18	Ancient woodland is an irreplaceable biodiversity resource due to its ecological value and long-established nature. Developers should avoid impacts on ancient woodland and ancient or veteran trees through site selection or scheme redesign where possible. The SoS should refuse development consent for proposals causing the loss or deterioration of irreplaceable habitats, including ancient woodland and ancient or veteran trees outside ancient woodland, unless there are wholly exceptional reasons and an appropriate compensation strategy is in place.	Paragraph 4.3.45 and 4.4.52 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to Paragraph 4.3.12 of the NPSWRI in consideration of alternatives in relation to irreplaceable habitats and impact of loss of habitat on SoS's decision.
4.3.19	Many species are protected by legislation, while others are identified as being of principal importance for biodiversity conservation in England and Wales under the Environment Act 2021 and associated biodiversity targets. The SoS should ensure applicants have measures in place to protect these species and habitats from harm, using planning requirements or obligations where necessary. Development consent should be	Paragraph 4.3.19 is referenced in paragraph 4.4.55 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), noting protection of habitats and species protected under legislation. Paragraph 4.4.56 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), concludes that with primary and tertiary mitigation in place no significant

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	refused where harm would occur unless the benefits of the development, including its need, clearly outweigh the impacts.	adverse residual effects are anticipated. The balancing exercise in paragraph 4.3.19 is therefore not engaged. ES Chapter 9 Marine biodiversity, (Document reference 6.1, DCO Volume 6, Version 1), paragraph 9.2.4 Table 9-2 references paragraph 4.3.19 of the NPSWRI.
4.3.20	Biodiversity Net Gain (BNG) aims to deliver measurable biodiversity improvements through habitat creation or enhancement associated with development. BNG must be applied alongside the mitigation hierarchy and does not replace existing environmental obligations or weaken protections for designated sites, protected species, priority species, irreplaceable habitats, or priority habitats.	Paragraph 4.3.20 of the NPSWRI is referenced in paragraph 4.4.57 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), noting improvements delivered by BNG. The Applicant's approach to delivering BNG is set out in the Biodiversity Gain Plan [APP-426]. ES Chapter 9 Marine biodiversity, (Document reference 6.1, DCO Volume 6, Version 1), paragraph 9.2.4 Table 9-2, references paragraph 4.3.20 of the NPSWRI.
4.3.21	Development should enhance the natural environment by delivering biodiversity net gains. Applicants should use the latest Biodiversity Metric to establish baseline biodiversity conditions and calculate BNG outcomes, presenting this information as part of the application. Biodiversity net gain may be delivered within the development site, and applications should include details of any proposed on-site gains.	Paragraph 4.3.21 is referenced in paragraphs 4.4.57 and 4.4.58 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), noting the development requirement to provide biodiversity net gains and on and off site. The Applicant's approach to delivering BNG is set out in the Biodiversity Gain Plan [APP-426].

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		Paragraph 4.3.21 of the NPSWRI is addressed in ES Chapter 8 Terrestrial and freshwater biodiversity, (Document reference 6.1, DCO Volume 6, Version 1), paragraph 8.2.4, Table 8-2, which notes that the assessment of likely significant effects on terrestrial and freshwater biodiversity associated with the Proposed Development is set out in section 8.8. Primary and tertiary mitigation is set out in section 8.4 and secondary mitigation, and enhancement is set out in section 8.9. ES Chapter 9 Marine biodiversity, (Document reference 6.1, DCO Volume 6, Version 1), paragraph 9.2.4 Table 9-2, references paragraph 4.3.21 of the NPSWRI.
4.3.22	Biodiversity net gain may be delivered wholly or partly off-site. Applications should explain any off-site provision and demonstrate it's contribution to wider strategic objectives. Applicants should refer to relevant national and local plans and strategies, including Green Infrastructure Strategies and Nature Recovery Networks, and follow recognised industry guidance. Where biodiversity net gain considerations informed project selection through the Water Resources Management Plan (WRMP) strategic options appraisal process, this information may be used to support site-specific proposals.	Paragraph 4.3.22 is referenced in paragraph 4.4.58, 4.4.59 and 4.4.60 noting deliverance of BNG to achieve relevant wider strategic outcomes and wider ENG. ES Chapter 9 Marine biodiversity, (Document reference 6.1, DCO Volume 6, Version 1), paragraph 9.2.4 Table 9-2, references paragraph 4.3.22 of the NPSWRI.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
4.3.23	Development proposals can create opportunities to incorporate biodiversity and geological benefits through good design. The SoS should assess whether applicants have maximised such opportunities within and around the development and may use planning requirements or obligations to secure their delivery.	Paragraph 4.3.23 is referenced in paragraph 4.44.61 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), noting the opportunity to incorporate biodiversity as part of good design. ES Chapter 9 Marine biodiversity, (Document reference 6.1, DCO Volume 6, Version 1), paragraph 9.2.4 Table 9-2, references paragraph 4.3.23 of the NPSWRI.
4.3.24	Schedule 15 of the Environment Act 2021 introduces provisions for a mandatory Biodiversity Net Gain requirement for Nationally Significant Infrastructure Projects (NSIPs). The detailed requirements for BNG on NSIPs will be established through a government Biodiversity Gain Statement.	Paragraph 4.3.24 is referenced in paragraph 4.4.62 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), noting mandatory BNG requirements under schedule 15 of the Environment Act 2011.

5.4 Climate Change Mitigation – Greenhouse Gas Emissions

Table 5.4 Climate Change Mitigation – Greenhouse Gas Emissions

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
Introduction		
4.4.1	The Planning Act requires National Policy Statements to explain how their policies address climate change mitigation and adaptation. This section focuses on mitigation and reflects the Government's international and domestic commitments to reduce greenhouse gas emissions.	The introductory paragraphs of the NPSWRI section on climate change mitigation are referenced in the PPS, paragraph 4.4.70.
4.4.2	Human activities continue to increase greenhouse gas concentrations in the atmosphere. The Climate Change Act 2008, as amended in 2019, sets a legally binding target for the UK to reduce greenhouse gas emissions by at least 100% below 1990 levels by 2050, achieving net zero.	
4.4.3	To reach this target, the Climate Change Act 2008 introduced carbon budgets, setting legally binding emissions limits for successive five-year periods. The Sixth Carbon Budget sets a target for greenhouse gas emissions to be approximately 77% lower in 2035 than in 1990.	

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
4.4.4	The Paris Agreement was adopted in 2015 and requires countries to prepare Nationally Determined Contributions to reduce emissions, with the aim of limiting global warming to well below 2°C and pursuing efforts to limit it to 1.5°C.	
4.4.5	Since December 2020, the UK has committed through its Nationally Determined Contribution to reduce economy-wide greenhouse gas emissions by at least 68% compared with 1990 levels by 2030.	
4.4.6	Although the Paris Agreement seeks global net zero emissions during the second half of the century, the UK has legislated to achieve net zero by 2050. When they are developed, post-2050 policies should be considered by applicants where relevant.	
4.4.7	The UK's net zero target was informed by the Intergovernmental Panel on Climate Change Special Report on Global Warming of 1.5°C and advice from the Climate Change Committee. Government infrastructure policy is also set out in the National Infrastructure Strategy.	
4.4.8	Water resources infrastructure can generate greenhouse gas emissions during both construction and	

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	operation. Construction impacts may arise from HGV movements, construction plant use and embodied carbon in materials, while operational impacts can result from water pumping, treatment processes and associated transport movements.	
4.4.9	The level of greenhouse gas emissions varies depending on the type of infrastructure. For example, desalination schemes can have significant operational emissions because of their energy-intensive treatment processes.	
Applicant's assessment		
4.4.10	Climate impacts are already assessed through the water resources management plan options appraisal process, and this information can help inform site-specific climate assessments.	Paragraph 4.4.10 is referenced in paragraph 4.4.70 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), noting climate impacts are considered as part of the WRMP process
4.4.11	Although emissions from an individual water resources project are unlikely to affect the Government's ability to achieve climate targets, applicants should assess and present the project's construction and operational emissions and explain how these relate to the water company's contribution to Government climate commitments. Information from the water resources	Paragraph 4.4.11 is referenced in paragraph 4.4.72 of the PPs (Document reference 5.5, DCO Volume 5, Version 2), noting requirements for applicant's assessment at project level. The evidence required for the climate impact of the proposed development and emissions assessment is provided in section 10.8, ES Chapter 10 Carbon and

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	management plan should provide supporting context and its method to reducing greenhouse gasses.	climate change [APP-089].The carbon emissions mitigation measures requested in paragraph 4.4.13 of the NPSWRI are provided in sections 10.4 and 10.9. Paragraph 10.5.53 of ES Chapter 10 Carbon and Climate Change [APP-089] refers to 4.4.11 of the NPSWRI when discussing the evaluation of each phase and if it influences national carbon emissions mitigation measures requested in paragraph 4.4.13 of the NPSWRI are provided in section 10.4 and 10.9.
4.4.12	Where a project falls under the Environmental Impact Assessment Regulations, the ES should assess likely climate effects on the project and quantify construction, operational and embodied carbon emissions. This information should allow the project to be assessed against the Government's climate obligations.	Paragraph 4.4.12 is referenced in paragraph 4.4.72 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), noting requirements for applicant's assessment at project level. The evidence required for the climate impact of the proposed development and emissions assessment is provided in section 10.8, ES Chapter 10 Carbon and climate change [APP-089].). This includes in combination impacts with other developments.
Mitigation		
4.4.13	Applicants should demonstrate how greenhouse gas emissions have been reduced through project design, construction and operation. This should include consideration of energy-efficient technologies, energy recovery, renewable energy generation and initiative, and greenhouse gas offsetting measures.	Paragraph 4.4.74 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), requires that evidence of appropriate mitigation measures during design, construction and operation have been presented, including a demonstration that feasible options for energy efficiency and recovery

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		technologies and processes, renewable energy sources and greenhouse gas offsetting have been investigated. Paragraph 4.4.13 is referenced in table 4-4, investigating feasible options, in paragraph 4.4.78 of the PPS (Document reference 5.5, DCO Volume 5, Version 2). The carbon emissions mitigation measures requested in paragraph 4.4.13 of the NPSWRI are provided in sections 10.4 and 10.9 of ES Chapter 10 Carbon and climate change [APP-089].
4.4.14	Potential mitigation measures include reducing HGV movements through greater use of on-site materials, using energy-efficient construction methods and equipment, incorporating gravity-fed water transfers, generating or using renewable energy, and providing carbon offsetting through woodland creation under the Woodland Carbon Code.	Paragraph 4.4.14 is referenced in table 4-4, investigating feasible options in paragraph 4.4.78 of the PPS (Document reference 5.5, DCO Volume 5, Version 2). Paragraph 4.4.14 of the NPSWRI is referenced in paragraph 4.4.74 noting requirement of evidence of mitigation measures during design, construction and operation.
Decision making		
4.4.15	An increase in greenhouse gas emissions alone is not a reason for refusing development consent for water resources infrastructure unless the emissions would materially impact the Government's ability to meet its climate commitments, including net zero, the Nationally Determined Contribution and statutory carbon budgets.	Paragraph 4.4.15 of the NPSWRI is referenced in paragraph 4.4.79 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), noting impact of increasing greenhouse gas emission on decision making.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
4.4.16	The SoS will consider whether mitigation measures reduce greenhouse gas emissions to the lowest level reasonably practicable. The adequacy of mitigation, including any proposed offsetting measures for significant emissions, will be an important factor in decision making.	Paragraph 4.4.16 of the NPSWRI is referenced in paragraph 4.4.77 in the PPS (Document reference 5.5, DCO Volume 5, Version 2), noting demonstration of commitment to reducing and mitigating green house gas emissions. Paragraph 4.4.84 of the PPS (Document reference 5.5, DCO Volume 5, Version 2, notes the requirement of the SoS to consider the effectiveness of mitigation measure proposed to ensure greenhouse gas emissions a as low as reasonably practicable. The SoS's view of the adequacy of the mitigation measures will be a material factor in the decision-making process, particularly the applicants proposed offsetting measures, for any significant emissions expected from the projects. The paragraph notes the recognition that there are no significant emissions expected from the project. Section 3 of the Outlined CMP, [APP423], sets out commitments and incentives for contractors to drive down greenhouse gas emissions as low as reasonably practicable. Paragraph 10.4.6 of ES Chapter 10 Carbon and Climate Change [APP-089] refers to 4.4.16 of the NPSWRI when discussing the proposed developments carbon strategic objective.

5.5 Coastal Change

Table 5.5 Coastal Change

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
Introduction		
4.5.1	For developments on or near the coast, coastal change is a key consideration. Water resources infrastructure, particularly desalination projects, can both contribute to coastal change and be affected by it. Government planning policy aims to reduce risks by avoiding inappropriate development in vulnerable coastal areas and preventing developments from increasing coastal impacts.	Paragraph 4.5.1 is referenced in paragraph 4.4.85 of the PPS (Document reference 5.5, DCO Volume 5, Version 2). Table 9-2 of ES Chapter 9 Marine biology (Document reference 6.1, DCO Volume 6, Version 1) refers to paragraphs 4.5.1 – 4.5.14 of the NPSWRI noting that the Project does not involve physical changes to the coastline, seabed, dredging or disposal into the seas. The assessment in section 9.8 of ES Chapter 9 Marine biology (Document reference 6.1, DCO Volume 6, Version 1) does not consider there to be any potential effects on the coastline. Section 9.3 of covers consultation scoping and engagement in relation to effects on coastal processes.
4.5.2	Coastal water resources infrastructure may require works such as abstraction points, discharge outfalls, dredging and coastal protection measures, which can affect the coastline, seabed, marine ecology, biodiversity and the historic environment. Desalination discharges, including concentrated saline effluent, require careful management through mechanisms such	Paragraph 4.5.2 is referenced in paragraph 4.4.88 of the PPS (Document reference 5.5, DCO Volume 5, Version 2).

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	as permits, marine licences or the Development Consent Order.	
4.5.3	Development can also cause indirect changes to coastal processes through altered hydrodynamics, potentially leading to erosion, accretion and impacts on offshore features, marine biodiversity and the historic environment.	Paragraph 4.5.3 is referenced in paragraph 4.4.88 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), noting advice that direct change may result in indirect impacts.
4.5.4	This section applies to projects located on or capable of affecting the coast. Related policy areas include biodiversity and geological conservation, flood risk, the historic environment, climate change adaptation and coastal recreation section and land use considerations section.	The proposal does not involve physical changes to the coastline, seabed, dredging or disposal into the seas. The assessment in section 9.8 of ES Chapter 9 Marine biology (Document reference 6.1, DCO Volume 6, Version 1), does not consider there to be any potential effects on the coastline. Section 9.3 covers consultation scoping and engagement in relation to effects on coastal processes.
Applicant's assessment		
4.5.5	Applications within a Coastal Change Management Area must justify why that location is necessary. Applicants should consult the local planning authority, Environment Agency, Inshore Fisheries and Conservation Authorities, and other relevant bodies on assessing vulnerability to coastal change. Assessments should use the latest UK Climate Change Risk Assessment, UK Climate Projections and other relevant climate evidence.	Paragraph 4.5.5 is referenced in paragraph 4.4.90 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), noting the requirement to explain why there is a need to be located on the coast and to consider the impacts of climate change.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
4.5.6	For projects involving dredging or disposal at sea, applicants should consult the Marine Management Organisation (MMO) and, where cross-border effects may occur, Natural Resources Wales and NatureScot at an early stage. Where projects impact coastal change the MMO should be consulted. Applicants should assess the context of coastal protection and how existing coastal conditions may affect the site and vice versa.	Paragraph 4.5.6 is referenced in paragraph 4.4.93 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), noting the set out assessment criteria for dredging and disposal.
4.5.7	Applicants should assess impacts on Marine Conservation Zones, habitats sites and Sites of Special Scientific Interest (SSSIs), including their ability to adapt to climate change through pressures such as coastal squeeze. For projects affecting the listed marine protected areas, early consultation should be undertaken with Natural England and, where relevant, Natural Resources Wales and NatureScot.	Paragraph 4.5.7 is referenced in paragraph 4.4.95 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) noting applicants' responsibility to identify effects of physical changes to the marine conservation zones, habitat sites and SSIs.
Mitigation		
4.5.8	Applicants should develop and agree appropriate mitigation measures for adverse coastal impacts in consultation with the Marine Management Organisation, Environment Agency, Natural England, Natural Resources Wales, NatureScot, Local Planning Authorities, Coastal Partnerships and other relevant coastal organisations, and demonstrate what mitigation has been agreed.	Paragraph 4.5.8 of the NPSWRI is referenced in paragraph 4.4.100 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), noting the requirement of applicants to propose mitigation measures for physical changes.
Decision making		

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
4.5.9	The SoS should only grant development consent in a Coastal Change Management Area where the development can demonstrate it will, be safe from flooding and coastal erosion throughout its operational life, not cause unacceptable impacts on coastal processes or designated features, deliver wider sustainability benefits, and not prevent the establishment or maintenance of a continuous, signed coastal route.	Paragraph 4.5.9 – 4.5.12 of the NPSWRI are referenced in paragraph 4.4.105 of the PPS (Document reference 5.5, DCO Volume 5, Version 5), acknowledging the project is not in a designated coastal Change Management Area.
4.5.10	The SoS should consider whether the applicant's proposed mitigation measures are appropriate, deliverable and, where necessary, secured through requirements or obligations attached to any grant of Development Consent Order.	
4.5.11	Essential infrastructure may be receiving development consent within a Coastal Change Management Area where there are clear plans to manage the effects of coastal change and where the development would not increase rates of coastal change elsewhere.	
4.5.12	Resilient and adaptable design can help address coastal change. The SoS should ensure that the Costal Change Management area remains protected from granted development consents throughout its life and may impose limits on the development's lifespan or require restoration measures where necessary.	

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
4.5.13	In addition to the National Policy Statement, the SoS must take account of relevant marine policy documents under the Marine and Coastal Access Act 2009, together with any applicable Shoreline Management Plans. Where there is a conflict between these documents and the National Policy Statement, the National Policy Statement takes precedence for decision-making on nationally significant infrastructure.	Paragraph 4.5.13 of the NPSWRI is referenced in paragraph 4.4.106 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), noting confirmation of SoS having regard to appropriate marine policy documents and shoreline management plans. Paragraph 4.4.106 references section 5 of the PPS where paragraph 4.5.13 of the NPSWRI is further addressed. Section 2.3.17 of ES Chapter 2 Planning legislation and policy, [APP-081], notes the hierarchy of policy should they conflict.
4.5.14	Substantial weight should be given to the risks of flooding and coastal erosion. Applicants must demonstrate that they have fully addressed the assessment and mitigation requirements of the National Policy Statement, including consideration of future climate change impacts on these risks.	Paragraph 4.5.14 of the NPSWRI is referenced in paragraph 4.4.107 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), noting that substantial weight should be attached to the risk of flooding and coastal erosion and considering impacts of climate change.

5.6 Dust, Odour, Artificial Light, Smoke and Steam

Table 5.6 Dust, Odour, Artificial Light, Smoke and Steam

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
Introduction		
4.6.1	The construction and operation of water resources infrastructure can generate emissions such as dust, odour, artificial light, smoke and steam, which may affect amenity or create a common law or statutory nuisance under Part III of the Environmental Protection Act 1990. These impacts may also be regulated through separate environmental consenting regimes and pollution control.	Paragraph 4.6.1 of the NPSWRI is referenced in paragraph 4.4.115 in the PPS (Document reference 5.5, DCO Volume 5, Version 2), discussing the possible adverse impacts of emissions produced by the development on amenity. Paragraph 4.4.116 of the PPS notes the Project does not include any elements which could have smoke or steam emissions and as such these impacts are not considered any further in the PPS.
4.6.2	Given the potential effects of emissions and the availability of a statutory authority defence against nuisance claims, applicants, the Examining Authority and the SoS should ensure these impacts are fully considered during the application and decision-making process.	
4.6.3	Some impact on local amenity, particularly during construction, is likely to be unavoidable for nationally significant infrastructure projects. However, impacts should be minimised and kept within acceptable limits.	Paragraph 4.6.3 of the NPSWRI is referenced in paragraph 4.4.115 in the PPS (Document reference 5.5, DCO Volume 5, Version 2), noting the requirement to limit amenity impacts.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
Applicant's assessment		
4.6.4	Where an Environmental Impact Assessment is required, the ES should assess likely significant effects arising from emissions such as dust, odour, artificial light, smoke and steam. The assessment should identify emission sources and quantities, affected locations, likely impacts during construction, operation and decommissioning, and proposed mitigation measures.	Paragraph 4.6.4 of the NPSWRI is referenced in paragraph 4.4.117 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), noting the applicant's requirement to assess the likely significant effect on amenity from emissions and type of emissions produced.
4.6.5	Applicants are encouraged to consult the relevant local planning authority and, where appropriate, the Environment Agency regarding the scope and methodology of the emissions assessment.	Paragraph 4.6.5 of the NPSWRI is refenced in paragraph 4.4.119 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), noting advice for the applicant to consult relevant local authority EA.
Mitigation		
4.6.6	The SoS should be satisfied that adequate mitigation measures are proposed and may require management and mitigation schemes, including a Construction Management Plan, to control dust, odour, artificial light, smoke and steam during construction and operation.	Paragraph 4.6.6 of the NPSWRI is referenced in paragraph 4.4.120 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), noting the requirement of the applicant to provide sufficient information demonstrating necessary mitigation will be put in place.
Decision making		
4.6.7	The SoS should be satisfied that all reasonable measures have been taken to minimise impacts on amenity from emissions. This includes considering the	Paragraph 4.6.7 of the NPSWRI is referenced in paragraph 4.4.122 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), advising that the SoS

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	effects of artificial lighting on local communities, dark landscapes and nature conservation interests.	should be satisfied that reasonable steps have and will be taken to minimise adverse impacts from emissions on amenities.
4.6.8	Where development consent is granted, the SoS should consider whether it is appropriate for the authorised development, including any associated development, to benefit from a defence of statutory authority against nuisance claims.	Paragraph 4.6.8 of the NPSWRI is addressed in paragraph 4.4.126 – 4.4.128 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) with reference to the Statutory Nuisance Statement [APP-054].

5.7 Flood Risk

Table 5.7 Flood Risk

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
Introduction		
4.7.1	Climate change is expected to bring milder, wetter winters, hotter, drier summers and rising sea levels across the UK. These changes are likely to increase flood risk in both currently identified flood-prone areas and some areas not currently considered at risk, while also increasing weather-related disruption from wind, rain, snow and ice.	Paragraphs 4.4.129 – 4.4.130 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refer to the introduction paragraphs of the NPSWRI on flood risk.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
4.7.2	The National Planning Policy Framework (NPPF) requires inappropriate development in flood-risk areas to be avoided where possible by directing development away from the highest-risk locations. Where development is necessary, it must be safe and prevent increasing flood risk elsewhere. Supporting guidance allows essential infrastructure, including NSIPs, in high-risk areas where presuming a Sequential Test and Exception Test are satisfied. The NPPF also requires development to be planned to address future climate change impacts.	
4.7.3	Water resources infrastructure can both influence and be affected by flood risk during construction and operation. In some cases, particularly with reservoirs, infrastructure may contribute to flood risk management by controlling abstraction or discharge during periods of heightened flood risk, subject to site-specific and operational considerations.	
Applicant's assessment		
4.7.4	An FRA should accompany development proposals in Flood Zones 2 and 3, projects 1 hectare or larger within Flood Zone 1 or sites identified as susceptible other flooding sources, or locations where the Environment Agency has identified critical drainage issues.	Paragraph 4.4.131 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.7.4 of the NPSWRI noting that applications should be accompanied with FRA if the infrastructure project is in flood zone 2 or 3.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
4.7.5	Applicants should use information from local flood risk management strategies and surface water management plans when assessing local flood risks such as surface water, groundwater and ordinary watercourse flooding. Surface water flood issues should be properly understood and accounted for by being identified and managed within the assessment.	Paragraph 4.4.131 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.7.5 of the NPSWRI directs applicants to local flood risk strategies and surface water management plans for information. The impact of the Proposed Development on surface and groundwater flows and flood risk is assessed in section 19.8. Also refer to ES Appendix 19.1 Flood Risk Assessment, [APP-189] - [APP-196]. Mitigation measures are detailed in section 19.4, ES Chapter 19, Water Environment (Document reference 6.1, DCO Volume 6, Version 1).
4.7.6	Applicants should assess risks from all types of flooding affecting or arising from the development and explain how those risks will be managed, taking climate change into account. The assessment should also recognise that reservoirs may, in some circumstances, provide flood storage and mitigation benefits.	Paragraph 4.4.131 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.7.6 of the NPSWRI requiring applicants to identify and assess risks of all types of flooding. The impact of the Proposed Development on surface and groundwater flows and flood risk is assessed in section 19.8. Also refer to ES Appendix 19.1 Flood Risk Assessment, [APP-189] - [APP-196].
4.7.7	The FRA should evaluate flood risks to and from the development, consider the effects of climate change over the project's lifetime, identify opportunities to	Paragraph 4.4.131 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.7.7 of the NPSWRI providing details of what is

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	improve local flood risk management, address safe access and assessment residual risk, consider operational requirements during severe flood events, and provide sufficient evidence for the SoS to apply the Sequential Test and Exception Test where required	needed to complete a FRA and refers to to ES Appendix 19.1 Flood Risk Assessment, [APP-189] - [APP-196]. The sequential test is addressed at paragraphs 4.4.140 ,4.4.148 and 4.4.150 – 4.4.152 of the PPS (Document reference 5.5, DCO Volume 5, Version 2).
4.7.8	Where flood risk may affect, or be affected by, a proposal, applicants should engage in pre application discussions with the Environment Agency and other relevant flood risk management organisations. Early engagement can help define the magnitude of flood risks, inform the scope of the FRA and identify additional information needed by SoS. The Environmental Agency can raise and discuss any concerns before a development consent application is submitted.	Paragraph 4.4.136 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.7.8 of the NPSWRI which advises engagement in early pre-application discussions with the EA and relevant flood risk management bodies. Paragraph 4.4.137 – 4.4.138 provide details of the engagement with the pre application Environment Agency.
Mitigation		
4.7.9	Development proposals should be designed to account for flood risk and include mitigation measures that ensure the scheme remains safe throughout its lifetime without increasing flood risk elsewhere, taking future climate change into consideration.	Paragraph 4.4.139 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.7.9 of the NPSWRI notes the need to include flood risk measure in the developments design. Mitigation measures are detailed in section 19.4, ES Chapter 19, Water Environment (Document reference 6.1, DCO Volume 6, Version 1).

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
4.7.10	Managing flood risk may require mitigation secured through planning obligations or requirements. Measures can include sustainable drainage systems (SuDS), vegetation to slow runoff and reduce peak flows, and other approaches that improve resilience to severe weather. In some cases, off-site mitigation may also be necessary, such as securing land for flood storage or supporting flood risk management measures delivered by other organisations.	Paragraph 4.4.144 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.7.10 of the NPSWRI notes mitigation measures should be secure through requirements and/or planning obligations. Mitigation measures are detailed in section 19.4, ES Chapter 19, Water Environment (Document reference 6.1, DCO Volume 6, Version 1).
4.7.11	For the purposes of the National Policy Statement, Sustainable Drainage Systems (SuDS) include a wide range of drainage approaches that manage surface water naturally. These include source control measures, infiltration systems, swales, filter strips, porous surfaces, ponds and basins for water storage, and flood routes designed to safely manage excess water and reduce flood risk.	Paragraph 4.4.144 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.7.11 of the NPSWRI discussing off-site mitigation with reference to the SuDS Drainage Systems Strategy (Document reference 19.1, DCO Volume 6)
4.7.12	Site layouts and surface water drainage systems should be designed to safely manage rainfall events that exceed their design capacity, ensuring excess water can be stored or conveyed without causing adverse impacts.	Paragraph 4.4.145 of the (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.7.12 of the NPSWRI notes that surface water drainage systems should be able to cope with events exceeding design capacity with reference to the SuDS Drainage Systems Strategy (Document reference 19.1, DCO Volume 6)

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
4.7.13	Drainage arrangements should ensure that surface water leaving the site does not exceed greenfield runoff rates, taking account of climate change, unless alternative arrangements achieve the same overall outcome.	Paragraphs 4.4.147 and 4.4.149 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.7,13 of the NPSWRI with reference to the SuDS Drainage Systems Strategy (Document reference 19.1, DCO Volume 6)
4.7.14	Developments may need storage and infiltration measures to reduce both peak discharge rates and overall discharge volumes. Where necessary, these measures may be located outside the project site and if necessary, secured through a planning obligation or a Development Consent Order requirement.	Paragraph 4.4.147 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), notes the potential necessity to provide surface water storage and infiltration to both limit and reduce the peak rate of discharge from the site. Mitigation measures are detailed in section 19.4, ES Chapter 19, Water Environment (Document reference 6.1, DCO Volume 6, Version 1).
4.7.15	The sequential approach should guide site design, with the most vulnerable uses located in areas at the lowest flood risk. Applicants should also seek opportunities to use open space for multiple purposes, including amenity, biodiversity and flood storage, while reducing flood risk through improved flow routes, flood storage capacity and Sustainable Drainage Systems.	Paragraph 4.4.148 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), notes the need to apply the sequential approach to the layout and design of the project. The sequential test is addressed at paragraphs 4.4.140 ,4.4.148 and 4.4.150 – 4.4.152 of the PPS (Document reference 5.5, DCO Volume 5, Version 2). Paragraph 4.4.149 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.7.15 of the NPSWRI discusses the SuDS strategy.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		Mitigation measures are detailed in section 19.4, ES Chapter 19, Water Environment (Document reference 6.1, DCO Volume 6, Version 1).
Decision making		
4.7.16	Where flood risk is relevant to an application, the SoS must be satisfied that an appropriate FRA has been prepared and that the Sequential Test, and where necessary the Exception Test, have been properly applied.	Paragraph 4.4.150 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.7.16 of the NPSWRI sets out requirement of SoS to be satisfies with appropriate FRA and sequential test. The impact of the Proposed Development on surface and groundwater flows and flood risk is assessed in section 19.8. Also refer to ES Appendix 19.1 Flood Risk Assessment, [APP-189] - [APP-196]. Mitigation measures are detailed in section 19.4, ES Chapter 19, Water Environment (Document reference 6.1, DCO Volume 6, Version 1). The sequential test is addressed at paragraphs 4.4.140 ,4.4.148 and 4.4.150 – 4.4.152 of the PPS (Document reference 5.5, DCO Volume 5, Version 2).
4.7.17	The SoS must be satisfied that development will not increase flood risk elsewhere and is appropriate for its location. This includes ensuring vulnerable development is located in the lowest-risk areas where possible, that the scheme is flood-resistant and resilient, incorporates Sustainable Drainage Systems	Paragraph 4.4.152 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), states that paragraphs 5.4.132 to 5.4.135 of the PPS confirm that a PFRA and FRA have been prepared and consider flood risk from all sources.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	where appropriate, manages residual flood risk safely, and provides safe access, escape routes and emergency planning measures where required.	
4.7.18	Applicants, the Examining Authority and the SoS should apply climate change adaptation policies set out in the National Planning Policy Framework and supporting guidance. Assessments should use the latest UK Climate Change Risk Assessment, UK Climate Projections and other relevant evidence. The ES and FRA should identify mitigation and adaptation measures covering the expected lifetime of the infrastructure. If updated climate projections become available after submission, additional information may be requested.	Paragraph 4.4.153 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), notes that the Applicant, the ExA and the SoS need to take into account other policy on climate change adaptation set out by the NPPF and supporting guidance in taking decisions. Paragraph 4.4.154 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), states that the SDR [APP-073] - [APP-075] sets out that the Project has been designed to consider climate change mitigation and adaptation which has been incorporated into the design of the Project to avoid and reduce environmental effects. ES Appendix 10.2 Climate change resilience assessment methodology [APP-148] evaluates future trends in climate change impacts and the Projects vulnerability and resilience. ES Chapter 19 Water Environment (Document reference 6.1, DCO Volume 6, Version 1) section 19.4 includes primary and tertiary mitigation measures which form part of the design of the Project.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
4.7.19	The SoS must be satisfied that the potential effects of climate change on flood risk have been properly considered and addressed through the design of the development.	Paragraph 4.4.158 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.7.19 of the NPSWRI noting that SoS needs to be satisfied that potential effects of climate change have considered within the design. The PPS cross refers to the Design Approach Document [APP-077] to [APP-079].
4.7.20	Any development consent must include approval of the overall drainage strategy. The SoS must be satisfied that the proposed drainage system complies with the National Standards for Sustainable Drainage Systems and that arrangements are in place for the adoption and long-term maintenance of any Sustainable Drainage Systems. Responsibility may lie with the applicant, landowner, local authority, Internal Drainage Board, water company or another appropriate body.	Paragraph 4.4.160 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), notes that approval for the development's overall approach to drainage systems will form part of any development consent issues by the SoS. The SoS will need to be satisfied that the proposed drainage system complies with the national standards for sustainable drainage systems. The Applicant is required to provide details of the long-term maintenance of SuDS. Paragraph 4.4.161 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), states that the proposed SuDS strategy for the AGP and WRP aligns with the principles that underpin guidance National Standards for SuDS (Department for Environment, Food and Rural Affairs updated July 2025).

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		Paragraph 4.4.162 of the PPS also states that section 14.4 of ES Chapter 14 Major accidents and disasters [APP-093] discusses that the construction compounds have been sited to avoid identified flood risk zones where possible.
4.7.21	Where the Environment Agency or lead local flood authority objects to an application on flood risk grounds, the SoS may still grant consent but must be satisfied that all reasonable steps have been taken by both the applicant and the relevant authority to resolve those concerns.	Paragraph 4.4.164 of the PPS ((Document reference 5.5, DCO Volume 5, Version 2), that the EA have been consulted on the AGP and the WRP and have not objected to this element of the Project – cross referring to the draft SoCG (Document reference 5.8, DCO Volume 5, Version 2).

5.8 Historic Environment

Table 5.8 Historic Environment

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
Introduction		
4.8.1	The construction and operation of water resources infrastructure can have adverse effects on the historic environment, affecting heritage assets above ground, below ground, and underwater.	Paragraph 4.4.165 of the PPS (Document reference 5.5, DCO Volume 5ersion 2), refers to paragraph 4.8.1 of the NPSWRI recognising the potential of adverse effects on the historic environment above and below ground.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
4.8.2	The historic environment comprises all aspects of the environment shaped by human activity over time, including visible, buried and submerged remains, as well as historic landscapes and managed vegetation.	ES Chapter 7 Archaeology and cultural heritage [APP-086] paragraph 7.2.4 (table 7-2) reference paragraphs 4.8.1 – 4.8.3 of the NPSWRI which helps sets out of the focus of the assessment in that chapter.
4.8.3	Elements of the historic environment that have significance for planning decisions are known as heritage assets. These may include buildings, monuments, sites, places, areas or landscapes. Their significance may arise from historic, archaeological, architectural or artistic interest and derives not only from the asset itself but also from its setting.	Paragraph 4.4.166 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.8.3 of the NPSWRI acknowledging heritage assets have some significance. Paragraph 4.4.67 of the PPS also refers to the requirements under the Infrastructure Planning (Decisions) Regulations 2010.
4.8.4	Some heritage assets are formally designated because of their particular significance. These designated heritage assets include World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Parks and Gardens, Registered Battlefields and Conservation Areas.	Paragraph 4.4.166 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to Chapter 4.8.4 of the NPSWRI describing designated assets.
4.8.5	Non-designated heritage assets with archaeological interest that are considered of equivalent significance to Scheduled Monuments should be treated in the same way as designated heritage assets. A lack of formal designation does not imply lesser significance.	Paragraph 4.4.166 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.8.5 of the NPSWRI describing non designated assets.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
4.8.6	he SoS must also consider impacts on other non-designated heritage assets when determining development consent applications. Such assets may be identified through the development plan process, local authority local lists, or during the examination and determination of a Nationally Significant Infrastructure Project (NSIP).	Paragraph 4.4.166 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.8.6 of the NPSWRI describing non designated assets.
Applicant's assessment		
4.8.7	Where an Environmental Impact Assessment (EIA) is required, the applicant should assess likely significant effects on the historic environment, including cumulative impacts, within the ES.	Paragraph 4.4.168 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.8.7 of the NPSWRI requiring including an assessment of significant heritage impacts in the ES. As at table 7-2 of ES Chapter 7 Archaeology and cultural heritage [APP-086] notes Section 7.8 of that chapter sets out need for assessment of the likely significant effects of the Project. Cumulative impacts are assessed at ES Chapter 20 [APP-099].
4.8.8	The ES should describe the significance of affected heritage assets and the contribution made by their setting. The assessment should be proportionate to the importance of the asset and sufficient to understand the proposal's impacts. As a minimum, applicants should consult the Historic Environment Record (HER) and the National Heritage List for England (NHLE) and use specialist expertise where necessary. Where archaeological remains may exist, appropriate desk-	Paragraph 4.4.168 and 4.4.169 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.8.8 of the NPSWRI setting out what should be included in the assessment of impacts on heritage assets. As at table 7-2 of ES Chapter 7 Archaeology and cultural heritage [APP-086] notes the methodology

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	based assessments and field evaluations should be undertaken to ensure impacts are properly understood.	used to identify and assess effects is set out in section 7.5. of that chapter. Section 7.7 of ES Chapter 7 Archaeology and cultural heritage [APP-086] considers heritage assets and their significance. Relevant supporting information, including archaeological and geoarchaeological DBA and geophysical and trial trenching evaluation, is included in ES Appendices 7.1 – 7.9. In addition, the assessment of effects on identified heritage assets is set out in section 7.8 ES Chapter 7 Archaeology and cultural heritage.
4.8.9	Applicants are encouraged to deliver positive benefits to the historic environment by demonstrating how the scheme responds to the significance of affected heritage assets. This may include enhancing heritage assets and their settings through sensitive design, addressing heritage assets that are or could become at risk, and mitigating visual or noise impacts while improving public access, interpretation, understanding and appreciation of affected heritage assets.	Paragraph 4.4.170 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.8.9 of the NPSWRI encouraging applicants to take opportunities that positively contribute to the historic environment – with cross reference to the Scheme Development Report [APP-073] - [APP-075] and Design Approach Document [APP-077] - [APP-079].. As at table 7-2 of ES Chapter 7 Archaeology and cultural heritage [APP-086], Section 7.4 of the chapter sets out the measures incorporated into the proposed development design to mitigate adverse impact and on historic character informing wider environmental and landscape mitigation proposals.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		Section 7.9 sets out additional mitigation required to address adverse impacts and opportunities for enhancement to heritage assets. Potential enhancement opportunities at Fisher's Pond, Waltham chase deer Park and Whickham Park are shown in the indicative Environmental Masterplan, attached to the Design Approach Document [APP-077] - [APP-079]. The Outline Written Scheme of Investigation (WSI) (Document reference 7.6, DCO Volume 7, Version 1) secures proposals for community engagement and outreach.
4.8.10	Applicants should carefully assess whether impacts on the historic environment will be direct or indirect, and whether they will be temporary or permanent.	Paragraph 4.4.168 off the PPS notes the requirement of careful consideration of whether impacts would be direct or indirect, temporary or permanent, which are covered in the assessment (Set out in the methodology, section 7.5 of ES Chapter 7 Archaeology and Cultural heritage, [APP-086]. Section 7.8 of ES Chapter 7 Archaeology and cultural heritage [APP-086] identifies indirect and direct impacts and if they are temporary or permanent. ES Appendix 7.7 Heritage assets setting assessment assesses the physical and temporal impacts.
Mitigation		

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
4.8.11	The ability to record a heritage asset should not be used to justify its loss. Preserving the heritage asset itself is of greater value than simply documenting it.	Paragraph 4.4.168 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.8.7 of the NPSWRI which sets out principles relating to mitigation. Paragraph 4.4.174 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), signposts the principles relating to mitigation in paragraph 4.8.11 of the NPSWRI with reference to ES Chapter 7 Archaeology and cultural heritage [APP-086]. Paragraph 4.4.175 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), notes the documentary record of an asset is not as valuable as retaining the heritage asset and the ability to record evidence of an asset should not be a factor in deciding whether the loss should be permitted and consent be given or not, ES Chapter 7 Archaeology and Cultural Heritage,[APP-086] . Table 7-2 of ES Chapter 7 Archaeology and cultural heritage [APP-086] references paragraphs 4.8.11 to 4.8.14 of the NPSWRI noting that section 7.4, of that chapter details primary and tertiary mitigation measures. Section 7.9 details secondary mitigation measures. The outline WSI (Document reference 7.6, DCO Volume 7, Version 1) sets out the stages for the investigation of the land within the order limits and the

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		development of appropriate recording mitigation and subsequent reporting, sharing and storing of findings. Cross referencing to non-investigative mitigation included in other documents submitted as part of the DCO application is also included.
4.8.12	Where harm to, or loss of, a heritage asset is justified, the SoS should require the applicant to record and improve understanding of the asset before it is lost. The level of recording should reflect the asset's significance and the scale of impact. Records should be published, deposited with the relevant Historic Environment Record, and any archive material should be placed in a local museum or other suitable public repository.	Paragraph 4.4.177 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.8.12 of the NPSWRI setting out requirements of the SoS where a loss to the whole or part of a heritage assets significance would be justified. Paragraph 4.4.177 refers to section 7.9 of ES Chapter 7 Archaeology and Cultural heritage [APP-086], which sets out the proposed approach to archaeological investigation aimed at providing mitigation of the loss of archaeological information.
4.8.13	Where necessary, the SoS may impose requirements through the Development Consent Order (DCO) to ensure investigations and recording are carried out promptly under a written scheme of investigation agreed with the relevant local authority, and that completion of the work is secured.	Paragraph 4.4.178 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.8.13 of the NPSWRI which sets out principles relating to mitigation – setting out the approach to mitigation at paragraphs 4.4.181 and 4.4.182.
4.8.14	Where assessments indicate a strong likelihood of previously undiscovered archaeological assets being present, the SoS may require procedures to identify,	Paragraph 4.4.179 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to Chapter 4.8.14 of the NPSWRI which sets out principles relating to mitigation.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	investigate and manage any heritage assets found during construction.	
Decision making		
4.8.15	When determining an application, the SoS will assess the significance of any heritage asset affected by the development, including its setting. This assessment will draw on information submitted with the application, evidence gathered during examination, records on the National Heritage List for England, Historic Landscape Character Records, relevant Historic Environment Records, representations from interested parties, and specialist advice where necessary.	Paragraph 4.4.183 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.8.15 of the NPSWRI which notes SoS considering the significance of heritage assets. Table 7-2 of ES Chapter 7 Archaeology and cultural heritage, [APP-086], references NPSWRI policies 4.8.15 to 4.8.29 noting that they set out the requirement to identify the magnitude of any harm to heritage assets to allow any adverse effects of the Project to be balanced against its benefits. This also notes that while this balancing exercise is a matter for the Planning Policy Statement (Document reference 5.6, DCO Volume 5, Version 2) and the decisionmaker, the assessments of harm required to support that decision making process are set out at section 7.8.
4.8.16	The SoS must comply with the duties relating to Listed Buildings, Conservation Areas, and Scheduled Monuments contained within the Infrastructure Planning (Decisions) Regulations 2010.	Paragraph 4.4.183 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.8.16 of the NPSWRI notes the requirement to comply with obligations of the Infrastructure Planning (Decisions) Regulation 2010.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
4.8.17	When considering impacts on heritage assets, the SoS should take full account of their significance and seek to avoid or minimise conflicts between the conservation of heritage assets and the proposed development.	Paragraph 4.4.183 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), Version 2, refers to paragraph 4.8.17 of the NPSWRI which notes SoS considering the significance of heritage assets.
4.8.18	The SoS should support the conservation and enhancement of heritage assets, encourage their viable use where consistent with conservation, and recognise their contribution to sustainable communities and economic vitality. New development should also positively contribute to local character and distinctiveness through appropriate design, including its scale, height, massing, alignment, materials, use and landscaping.	Paragraph 4.4.184 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.8.18 of the NPSWRI noting the SoS's consideration of the desirability of positive contributions to local character. The commitments in section 2 and 3 of the DPD [APP-077] - [APP-079] include measures which will ensure sensitive design of permanent development within the setting of heritage assets
4.8.19	When considering impacts on a designated heritage asset, the SoS should give great weight to its conservation. The more significant the asset, the greater the weight that should be given, regardless of whether the impact amounts to substantial harm, total loss, or less than substantial harm.	Paragraph 4.4.185 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.8.19 of the NPSWRI in relation to weight of harm.
4.8.20	Because heritage assets are irreplaceable, any loss or harm has cultural, environmental, economic and social consequences. Harm may arise through alteration, destruction, or inappropriate development within a heritage asset's setting. Any harm or loss to a designated heritage asset must therefore be supported by clear and convincing justification.	Paragraph 4.4.186 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.8.20 of the NPSWRI requiring the justification of harm or loss to designated heritage sites. Paragraphs 4.4.187 – 4.4.190 provide a planning judgement of harm to significance for designated heritage assets.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
4.8.21	Substantial harm to, or loss of, a Grade II Listed Building or Grade II Registered Park and Garden should only occur in exceptional circumstances. Harm to the most significant designated assets, including World Heritage Sites, Scheduled Monuments, Grade I and Grade II* Listed Buildings, Protected Wreck Sites, Registered Battlefields, and Grade I and Grade II* Registered Parks and Gardens, should be wholly exceptional.	Paragraph 4.4.191 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.8.21 of the NPSWRI clarifying that the policy tests at paragraphs 4.8.21 and 4.8.23 of the NPSWRI are not engaged.
4.8.22	Any harm to the significance of a designated heritage asset must be balanced against the public benefits of the development. The greater the level of harm, the stronger the justification and public benefit required.	Paragraph 4.4.192 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.8.22 of the NPSWRI noting that 4.8.22 and 4.824 apply where there would be less than substantial harm to a designated asset. Paragraph 4.4.193 – 4.4.196 provide the relevant policy analysis.
4.8.23	Where the development will lead to substantial harm to or total loss of significance of a designated heritage asset, Th SoS will refuse consent unless it can be demonstrated that the substantial harm or loss is necessary to deliver substantial public benefits which outweigh harm or loss. Alternatively, that the nature of heritage assets prevents reasonable uses of the site, there is no viable use of the heritage asset in the medium term that will enable its conservation, conservation grant	Paragraph 4.4.191 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.8.23 of the NPSWRI clarifying that the policy tests at paragraphs 4.8.21 and 4.8.23 of the NPSWRI are not engaged.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	funding or nonprofit charitable or public ownership is not possible, the harm is outweighed by the benefit of bringing the site back into use.	
4.8.24	Where development would result in less than substantial harm to a designated heritage asset, that harm should be weighed against the public benefits of the proposal, including securing the asset's optimum viable use where relevant.	Paragraph 4.4.192 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.8.22 of the NPSWRI noting that 4.8.22 and 4.824 apply where there would be less than substantial harm to a designated asset. Paragraph 4.4.193 – 4.4.196 provide the relevant policy analysis.
4.8.25	The impact on non-designated heritage assets must also be considered in decision-making. A balanced judgement should be applied, taking account of both the significance of the asset and the extent of any harm or loss.	Paragraph 4.4.197 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.8.25 of the NPSWRI discussing the weight of impacts on non-designated heritage assets in applications.
4.8.26	Not every element within a World Heritage Site or Conservation Area contributes equally to its significance. Where development would result in the loss of a building or feature that makes a positive contribution, the SoS should assess whether this amounts to substantial or less than substantial harm, taking into account the importance of the affected element and its contribution to the significance of the wider designation.	Paragraph 4.4.201 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.8.26 of the NPSWRI discussing loss of buildings and other factors contributing to the significance of a world heritage site.
4.8.27	Where harm to, or loss of, a heritage asset is justified, the SoS may impose a planning requirement or obligation to	Paragraph 4.4.202 of the PPS(Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	ensure that the loss does not occur until the relevant stage of the approved development has commenced.	4.8.27 of the NPSWRI noting the SoS's consideration of imposing a requirement on the consent or agreement preventing loss until the relevant part of the development has commenced, should the loss be justified. Paragraph 4.4.198 ant Table 4-8 of the PPS provide an assessment of harm to non designated assets with reference to ES Chapter 7 Archaeology and cultural heritage, [APP-086]. Further analysis is provided at paragraphs 4.4.199 – 4.4.200 of the PPS.
4.8.28	Applicants should seek opportunities for development within Conservation Areas, World Heritage Sites, and the setting of heritage assets to enhance and better reveal their significance. Proposals that preserve or improve those aspects of a setting that positively contribute to the significance of a heritage asset should be supported.	Paragraph 4.4.203 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) refers to paragraph 4.8.28 of the NPSWRI noting this requirement is addressed in relation to paragraph 4.8.9 of the NPSWRI.
4.8.29	Where a heritage asset has deteriorated because of deliberate neglect or intentional damage, the SoS should not take that deteriorated condition into account when making a decision on the application.	Paragraph 4.4.204 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.8.29 of the NPSWRI relating to evidence of deliberate neglect, which is not engaged.

5.9 Landscape and Visual Impacts

Table 5.9 Landscape and Visual Impacts

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
Introduction		
4.9.1	The landscape and visual impacts of a water resources NSIP will vary depending on the type of infrastructure proposed, its location and the surrounding landscape setting. Landscape and visual effects include impacts on tranquillity and other landscape characteristics that influence people's enjoyment of the natural environment and recreational facilities. References to landscape should also be taken to include waterscape, seascape and townscape where relevant. Where development is proposed within sensitive or protected landscapes, applicants should engage at the earliest opportunity with the relevant local authority, National Park Authority, National Landscape partnership or Conservation Board.	Paragraph 4.4.205 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.9.1 of the NPSWRI recognising the variation landscape and visual of impacts caused by the proposed water resource projects. Paragraph 4.4.206 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), notes the engagement undertaken by the applicant in relation to the proximity to south national downs as advised in paragraph 4.9.1 of the NPSWRI. Table 13-2 of ES Chapter 13 Landscape and Visual [APP-092] references paragraph 4.9.1 of the NPSWRI, signposting section 13.8 and section 13.3 where paragraph 4.9.1 is addressed.
Applicant's assessment		
4.9.2	The applicant should assess all likely significant landscape and visual effects, including cumulative impacts, and report these within the ES. The assessment should be informed by relevant guidance on landscape assessment and should reference any local landscape	Paragraph 4.4.208 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.9.2 of the NPSWRI which sets out the requirements for the scope of the assessment of landscape and visual impacts and how it should be reported.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	character assessments, National Character Area Profiles, and associated studies. It should also consider any relevant policies within local development documents that are based on these assessments, as well as the applicable protected landscape management plans.	Table 13 -2 of ES Chapter 13 Landscape and Visual [APP-092] references paragraph 4.9.2 of the NPSWRI, signposting section 13.5 and ES Appendix 13.2, Landscape and Visual impact assessment methodology, [APP-172], where paragraph 4.9.2 is addressed.
4.9.3	The assessment should identify any significant effects arising during both the construction and operational phases of the development. This includes impacts on landscape components, as well as effects on overall landscape character, including historic character and other cultural or associative landscape attributes.	Paragraph 4.4.208 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.9.3 of the NPSWRI which sets out the requirements for the scope of the assessment of landscape and visual impacts and how it should be reported. Table 13 -2 of ES Chapter 13 Landscape and Visual [APP-092] references paragraph 4.9.3 of the NPSWRI, signposting section 13.5 and ES Appendix 13.2 Landscape and Visual impact assessment methodology,[APP-172], where paragraph 4.9.3 is addressed.
4.9.4	The assessment should consider the visibility and prominence of the development during construction and operation, together with its effects on views and visual amenity. It should also assess any impacts arising from noise and light pollution, including effects on local amenity, tranquillity and dark skies.	Paragraph 4.4.208 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to C paragraph 4.9.4 of the NPSWRI which sets out the requirements for the scope of the assessment of landscape and visual impacts and how it should be reported. Table 13 -2 of ES Chapter 13 Landscape and Visual [APP-092] references paragraph 4.9.4 of the NPSWRI, signposting section 13.5 and ES Appendix 13.2 Landscape and Visual

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		impact assessment methodology, [APP-172], where paragraph 4.9.4 is addressed.
4.9.5	Strong legislative protection applies to National Parks, National Landscapes (Areas of Outstanding Natural Beauty) and The Broads. Any Development Consent Order application affecting these areas must comply with the duties established by the National Parks and Access to the Countryside Act 1949, the Countryside and Rights of Way Act 2000, and amendments introduced through section 245 of the Levelling-up and Regeneration Act 2023.	Paragraph 4.4.208 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.9.5 of the NPSWRI which sets out the requirements for the scope of the assessment of landscape and visual impacts and how it should be reported. Paragraph 4.4.209 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), notes the requirement for applications within or effecting land in a national park to comply with duties in the national parks and access to countryside Act 1949 as amended by s245 of the levelling up and regeneration Act 2023, including the duty to “seek to further” the statutory purpose of the national parks. The Applicant’s approach is set out at paragraph 4.4.210. Table 13 -2 of ES Chapter 13 Landscape and Visual [APP-092] references paragraph 4.9.5 of the NPSWRI, signposting section 13.2 which sets out the legislation policy and guidance, section 13.7 which sets out baseline conditions and section 13.8 which assesses the potential for the proposed development to affect land within the SDNP identified by the LVIA.
4.9.6	Where relevant, applicants must demonstrate how they have met the requirements of Defra's "English National Parks and the Broads: UK Government Vision and Circular 2010", or any successor guidance. These	Paragraph 4.4.208 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) refers to paragraph 4.9.6 of the NPSWRI which sets out the requirements for the scope of the assessment of landscape and visual impacts and how it should be reported.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	requirements also apply where infrastructure projects affect National Landscapes.	Table 13 -2 of ES Chapter 13 Landscape and Visual [APP-092] references paragraph 4.9.6 of the NPSWRI, signposting section 13.2 which sets out legislation, policy and guidance, section 13.7 which sets out base conditions and section 13.8 which provides an assessment of effects on national parks and landscapes.
Mitigation		
4.9.7	Landscape and visual effects may be avoided or reduced by decreasing the scale of a project or altering its design or operation. However, such changes can constrain performance and reduce functionality. In exceptional circumstances, where mitigation provides substantial landscape and visual benefits, the SoS may determine that these benefits outweigh a marginal reduction in the project's scale or operational function.	Paragraph 4.4.212 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.9.7 of the NPSWRI which provided advice around reducing scale and/or changing it operation to help mitigate landscape and visual effects. Paragraph 4.9.7 is referenced in ES Chapter 13 Landscape and visual, [APP-092], paragraph 12.2.4, Table 13-2. The table refers to sections 13.4, 13.9, Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1).and outline LEMP (Document reference 7.5, DCO Volume 7, Version 1), where paragraph 4.9.7 of the NPSWRI is addressed.
4.9.8	Adverse landscape and visual effects can be minimised through careful site selection, design, material choices and landscaping proposals suited to the scale and nature of the development. Attention should be paid to materials and design approaches, including consideration of the guidance on good design for water resources	Paragraph 4.4.213 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.9.8 of the NPSWRI addressing mitigation of landscape and visual effects.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	infrastructure set out in section 3.6 of the National Policy Statement.	Paragraph 4.9.8 is referenced in ES Chapter 13, Landscape and visual, Paragraph 12.2.4, Table 13-2 [APP-092] which signposts sections 13.4, 13.9, Design Principles Document (Document reference 5.11, DCO Volume 5, version 1), and the Outline LEMP (Document reference 7.5, DCO Volume 7, Version 1), where paragraph 4.9.8 of the NPSWRI is addressed.
4.9.9	Where appropriate, particularly depending on project scale, surrounding topography and nearby populations, off-site landscaping may be used to reduce landscape and visual impacts. Should measures be authorised through a Development Consent Order, they must fall within the Order's limits. Measures such as filling gaps in existing tree lines and hedgerows can help reduce visual impacts when viewed from longer distances.	Paragraph 4.4.213 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.9.9 of the NPSWRI addressing mitigation of landscape and visual effects. Paragraph 4.9.9 is referenced in ES Chapter 13 Landscape and visual, [APP-092], Paragraph 12.2.4, Table 13-2. Which signposts section 13.4, 13.9, Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1), and the Outline LEMP (Document reference 7.5, DCO Volume 7, Version 1) which address paragraph 4.9.8 of the NPSWRI.
Decision making		
4.9.10	The significance of landscape effects depends on the existing landscape character, its quality, value and ability to accommodate change. These factors should inform decisions on landscape and visual impacts. Development should therefore be sensitively designed and located, taking account of operational and site constraints, with the objective of avoiding or minimising	Paragraph 4.4.214 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.9.10 of the NPSWRI setting out the approach to delivering 'good design' and providing policy analysis at paragraphs 4.4.215 – 4.4.219.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	harm and providing suitable mitigation or enhancement measures wherever possible.	Paragraph 4.9.10 is referenced in ES Chapter 13 Landscape and visual, [APP-092], paragraph 12.2.4, Table 13-2. signposting section 13.4 which sets out primary and tertiary mitigation measures, section 13.9 which sets out monitoring and enhancement measures, the design and principles document (Document reference 5.11, DCO Volume 5, Version 1) and the Outline LEMP (Document reference 7.5, DCO Volume 7, Version 1).
4.9.11	Great weight should be given to conserving and enhancing natural beauty within National Parks, The Broads and National Landscapes, which have the highest level of landscape protection. These areas have specific statutory purposes which the SoS must seek to further when making decisions affecting them. National Park Authorities, Conservation Boards and authorities responsible for National Landscapes should be consulted early during the water resources management plan options appraisal process to assess the suitability of development in these areas. The duty to further the purposes of protected landscapes also applies to local authorities, including National Park Authorities, and statutory undertakers.	Paragraph 4.4.220 of the PPS (Document reference 5.5, DCO Volume 5, version 2), refers to Chapter 4.9.11 of the NPSWRI discusses developments proposed within nationally designated landscapes.
4.9.12	The SoS should refuse development consent within nationally designated landscapes unless exceptional circumstances exist and it can be shown that the development is both unavoidable and in the public	Paragraph 4.4.220 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) notes that paragraphs 4.9.11 to 4.9.13 of the NPSWRI relate to developments

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	interest. Consideration should include the need for the development, including national interests and local economic implications; the potential to meet the need elsewhere outside the designated area or by alternative means; and any effects on the environment, landscape and recreational opportunities, together with the extent to which those effects can be mitigated.	proposed within nationally designated landscapes which is not relevant to the Project.
4.9.13	Where consent is granted, the SoS should be satisfied that the development will achieve high environmental standards and, where possible, include measures to conserve and enhance natural beauty and related environmental interests. Where necessary, requirements should be implemented to ensure standards and enhancement measures are delivered.	
4.9.14	The statutory duty to further the purposes of protected landscapes applies not only to developments within protected landscapes also to developments outside their boundaries where effects may occur within their setting. Proposals should avoid undermining the purposes for which these areas are designated and must be designed sensitively, taking account of siting, operational and other relevant constraints. This duty also extends to developments in England that could affect designated landscapes in Wales or Scotland.	Paragraph 4.4.221 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.9.14 of the NPSWRI discusses with developments located outside nationally designated areas which may impact them. Policy analysis against this paragraph is provided at paragraphs 4.4.222 – 4.4.228 of the PPS. Paragraph 4.9.14 is also referenced in ES Chapter 13 Landscape and visual, [APP-092], paragraph 12.2.4, Table 13-2. Section 13.2 sets out guidance on legislation and policy, section 13.7 set out baseline landscape conditions, section 13.8 summarises effects on nationally designated areas.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
4.9.15	Outside nationally designated are areas valued locally, Attention should be given to local development documents that contain policies on landscape character assessment and identified valued landscapes. This however cannot be a sole reason to refuse consent, as this could place unreasonable restrictions on otherwise acceptable development.	Paragraphs 4.4.229 to 4.4.231 address of the PPS (Document reference 5.5, DCO Volume 5, Version 2), development not affecting nationally designated areas. Paragraph 4.9.15 is referenced in ES Chapter 13 Landscape and visual, [APP-092], paragraph 12.2.4, Table 13-2. Baseline conditions of the landscape are set out in section 13.4, Monitoring and enhancement measures in 13.9.
4.9.16	During decision making the SoS should consider whether the development has been carefully designed, the environmental impacts on the landscape and siting, operational and other constraints to mitigate and avoid harm to avoid harm to the landscape	Paragraph 4.4.232 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to Chapter 4.9.16 of the NPSWRI providing policy analysis at paragraphs 4.4.233 to 4.4.235 Paragraph 4.9.16 is referenced in ES Chapter 13 Landscape and visual, [APP-092], paragraph 12.2.4, Table 13-2. Baseline conditions of the landscape are set out in section13.7, Primary and tertiary mitigation measures are set out in section 13.4, Monitoring and enhancement measures in 13.9.
4.9.17	The SoS will assess whether adverse visual effects on sensitive receptors, like residents and visitors, outweigh the benefits of the proposed development. Attention should be given to coastal areas, which are especially susceptible to visual intrusion due to highly visible development on the foreshore, skyline or across	Paragraphs 4.4.236 to 4.4.242 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), address visual effects as required by NPSWRI paragraph 4.9.17. Paragraph 4.9.17 is referenced in ES Chapter 13 Landscape and visual, [APP-092], paragraph 12.2.4,

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	undeveloped stretches of coastline. This is especially important in areas designated as Heritage Coast.	Table 13-2. Visual baseline conditions including visual receptor groups are set out in section 13.7.

5.10 Land Use Including Open Space, Green Infrastructure and Green Belt

Table 5.10 Land Use Including Open Space, Green Infrastructure and Green Belt

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
Introduction		
4.10.1	The land use impacts of a water resources Nationally Significant Infrastructure Project (NSIP) will depend on the type, scale and location of the development. Applicants should engage early with relevant local, county or unitary planning authorities, or the Marine Management Organisation (MMO) in coastal areas, to discuss land use implications. Opportunities to use previously developed land (brownfield land) should be fully explored to promote the efficient use of land.	Paragraph 4.4.243 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.10.1 of the NPSWRI noting encouragement of early engagement with host local authorities. Paragraph 4.4.244 explains that the draft SoCGs set out how the Applicant has proactively engaged with host local authorities and with the MMO through the preparation of the Project. Paragraph 4.4.245 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) states that the Scheme Development Report [APP-073] - [APP-075] provides an overview of the scheme development process in section 1.3.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		Table 12-1, of ES Chapter 12, [APP-091], also refers to ES Chapter 4 Consideration of alternatives, [APP-083], which considers alternatives of the proposed development including use of previously developed sites.ES Chapter 12, Land use and agriculture, [APP-091], references paragraph 4.10.1 in Table 12-1. Section 12.3 of ES Chapter 12, [APP-091], summarises consultation, scoping and engagement of the Project
4.10.2	Green Belts are designated in development plans around certain cities and urban areas, including London, to prevent urban sprawl by keeping land permanently open. Their key characteristics are openness and permanence. Grey Belt land includes previously developed land or Green Belt land that makes only a limited contribution to the core purposes of Green Belt protection. Further guidance on the purpose and protection of both Green Belt and Grey Belt land is provided in the National Planning Policy Framework (NPPF).	Paragraph 4.4.246 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) refers to paragraph 4.10.2 of the NPSWRI stating that the Order Limits are not located within the Green Belt and therefore this paragraph is not considered any further in the PPS.
4.10.3	Best and Most Versatile (BMV) agricultural land is the most productive and adaptable land for food and non-food crops, including biomass, fibres and pharmaceuticals. It comprises Agricultural Land Classification Grades 1, 2 and 3a. The National Planning Policy Framework (NPPF) requires local planning authorities to consider the economic and wider benefits of BMV land. Where development on agricultural land is	Paragraph 4.4.247 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.10.3 of the NPSWRI identifying grades 1, 2 and 3 as the best (BMV) agricultural land grades. This is further addressed in paragraphs 4.4.248 to 4.4.252. Paragraph 4.10.3 is referenced in Table 12-1 of ES Chapter 12 Land use and agriculture [APP-091]. Section

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	necessary, lower-quality land should be used in preference to higher-quality land. Additional guidance is provided by Planning Practice Guidance (PPG) for the Natural Environment.	12.8 of ES Chapter 12 Land use and agriculture [APP-091] considers impacts on agricultural land and soil resources with reference to ES Appendix 12.1 Agricultural land quality [APP-169], which sets out the assessment of agricultural land classification.
4.10.4	Development can affect soil resources through the direct loss of soil, land contamination and structural damage. Indirect impacts may also occur through changes to water regimes, organic matter content, soil biodiversity and natural soil processes.	Paragraph 4.4.253 and 4.4.254 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) refer to paragraph 4.10.4 of the NPSWRI and reference ES Appendix 12.1 Agricultural land quality [APP-169] and the Outline Soil Resource Management Plan, located within Appendix B of the Outline CEMP (Document reference, 7.1, DCO Volume 7, Version 1). Paragraph 4.10.4 of the NPSWRI is referenced in Table 12-1 of ES Chapter 12 Land use and agriculture [APP-091] in section 12.8, which considers the assessment of likely significant effects on land use and agriculture.
4.10.5	For development on previously developed land, applicants must assess the risks associated with land contamination. At a minimum, contamination risks should be considered in accordance with the Contaminated Land Statutory Guidance.	Paragraph 4.4.256 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) notes that effects of contamination on previously developed land and the WRP site have been considered in ES Chapter 11 Land quality and ground conditions [APP-080], which provides an assessment of likely risk posed by land contamination during construction, operation and decommissioning of the Project.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		Paragraph 4.4.256 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) also states that section 11.8 of ES Chapter 11 Land quality and ground conditions [APP-086] presents the assessment of likely significant effects on land quality and ground conditions resulting from the construction, operation and decommissioning of the Project. It concludes that with primary mitigation measures, which are set out in section 11.4 and tertiary measures, which will be secured in the Outline CEMP (Document reference 7.1, DCO Volume 7). Paragraph 4.10.5 is referenced in Table 12-1 of ES Chapter 12 Land use and agriculture [APP-091]. Section 12.8 considers impacts on agricultural land and soil resources.
4.10.6	Access to high-quality open space, the countryside, and opportunities for sport and recreation can form part of necessary mitigation or compensation measures. Evidence shows that access to green space can improve mental health, helping to prevent mental ill-health, support the management of mild to moderate mental health conditions, and in some cases assist with more severe conditions. Green spaces can also provide benefits for recreation, physical health, social wellbeing and employment.	Paragraphs 4.4.259 – 4.4.261 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), address paragraphs 4.10.6 and 4.10.7 of the NPSWRI with reference to Section 4 of the ENG Statement [APP-427] and section 4 of the Case for the Project (Document reference 5.6, DCO Volume 1, Version 1), and Appendix E of the Biodiversity Gain Plan [APP-426]. Paragraph 4.10.6 is referenced in Table 12-1 of ES Chapter 12 Land use and agriculture [APP-091], which cross references to where access to high-quality open spaces is considered in ES Chapter 17 Socio-economics,
4.10.7	Green and blue infrastructure can provide significant environmental, social, health and economic benefits.	

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	Green infrastructure includes features such as parks, woodlands, street trees, hedgerows, green roofs and green walls, while blue infrastructure includes canals, rivers, streams, ponds, lakes and their margins. When well designed and managed, these networks can support biodiversity recovery, carbon sequestration, surface water management, pollution reduction, noise attenuation and urban cooling.	tourism and health (Document reference 6.1, DCO Volume 6, Version 1). Section 17.8 of Chapter 17 considers green space a health determinant. Section 3.2 of the Outline LEMP [APP-423] details how this contributes to the green infrastructure strategy, including specific design principles in the Design Principles Document (Document reference 5.11, DCO Volume 5, version 1).
4.10.8	Paragraph 4.10.8 sets out that trees and woodlands also contribute to a number of other sustainability considerations and that there is a government commitment to planting more trees and protecting existing trees.	Paragraph 4.4.262 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.10.8 of the NPSWRI notes the contribution of trees and woodland to sustainability and the relevant sections of the Scheme Development Report [APP-073] - [APP-075] and Design Approach Document [APP-077] to [APP-079].
Applicant's Assessment		
4.10.9	Applicants should assess existing and planned land uses surrounding the project and consider impacts arising from replacing existing uses, preventing existing neighbouring uses from continuing, or restricting developments proposed through the development plan. The assessment should be proportionate to the scale and likely impacts of the scheme. For development on previously developed land, applicants must also assess land contamination risks and explain how these risks will be addressed.	Paragraph 4.4.265 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.10.9 of the NPSWRI noting the requirement of existing and proposed land uses near the project to be identified. Paragraph 4.4.266 the process of site and route selection with reference to the Scheme Development Report [APP-073] - [APP-075] Paragraph 4.10.9 is referenced in Table 12-1 of ES Chapter 12 Land use and agriculture [APP-091]. Section 12.3 sets out considerations of land use and agricultural topics within the scoping. Data on topics including

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		recreational building and land and BMV agricultural land is included in section 12.7. Section 12.8 assesses impacts from proposed development on the community land and facilities. Section 12.5.49 states assessment of effects on development land is based on sites allocated in the relevant local plan. Section 12.4 sets out primary and tertiary measures to minimise impacts on BMV cultural land. Further information on the approach to assessing impacts and presence of green belt were checked and considered in section 12.5. Section 12.8 included the assessment of effects on BMV agricultural land. Paragraph 12.5.21 includes information on supporting agricultural land surveys. ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1) and ES Appendix 11.2 Geotechnical and geo-environmental reports [APP -151 to APP-168 – 18 documents] considers risk of contamination of previously developed land. Effects on employment from the development on Harts Farm way are considered in section 17.8, ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1).
4.10.10	Existing open space, sports facilities, recreational land and associated buildings should only be developed where they are no longer required or where equivalent or	Paragraph 4.4.269 of the PPS (Document reference 5.2, DCO volume 5, version 2), refers to paragraph 4.10.10 of the NPSWRI noting that open space and recreational

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	better replacement provision is delivered in an appropriate location. Applicants proposing development on such land should take account of any local authority assessment of need and consult the local community regarding the proposals.	buildings and land shouldn't be developed unless the land is not needed. Paragraph 4.10.10 is also referenced in Table 12-1 of ES Chapter 12 Land use and agriculture [APP-091] noting that additional information regarding effects on recreation and health is provided in ES Chapter 17 Socioeconomics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1).
4.10.11	Existing trees and woodlands should be retained wherever possible. Applicants should assess all impacts on trees and woodland within the site boundary and identify mitigation measures to minimise adverse effects and avoid net deforestation. Mitigation may include buffer zones, enhanced habitat connectivity and improved woodland management. Where woodland loss cannot be avoided, compensatory planting should be provided and arrangements made to secure the long-term management and maintenance of replacement trees.	Paragraph 4.4.271 – 4.4.274 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) address paragraph 4.10.11 of the NPSWRI with reference to ES Appendix 13.5 Arboricultural Impact Assessment (AIA) [APP-175 - APP-176]. ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1), considers effects on trees and woodland. Paragraph 4.10.11 is referenced in Table 12-1 of ES Chapter 12 Land use and agriculture [APP-091] which notes that effects on trees and woodland are considered in ES Chapter 8 Terrestrial and freshwater biodiversity,(Document reference 6.1, DCO Volume 6, Version 1).

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
4.10.12	During pre-application discussions, the local planning authority should identify any concerns regarding land use impacts, taking account of the development plan, relevant planning applications and any evidence that land is no longer required for its existing purpose. Early and ongoing engagement with both local planning authorities and local communities is particularly important for large-scale projects, such as reservoirs. Relevant local authorities may also include these matters in a Local Impact Report submitted during the development consent process.	Paragraph 4.4.274 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.10.12 of the NPSWRI notes the need for pre application discussions about impacts on land use and addresses this in paragraph 4.4.275. Paragraph 4.10.12 is referenced in Table 12-1 of ES Chapter 12 Land use and agriculture [APP-091].
4.10.13	The normal policies that control development in the countryside apply equally within the Green Belt, where there is an additional presumption against inappropriate development. Such development should only be permitted in very special circumstances, as defined by government guidance. Applicants should establish whether any part of their proposal lies within the Green Belt and whether it would constitute inappropriate development under Green Belt policy. Metropolitan Open Land and land designated as Local Green Space in a local or neighbourhood plan receive the same level of protection as Green Belt land and should also only be developed in very special circumstances.	Paragraph 4.4.276 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.10.13 of the NPSWRI notes protection applying to land identified as local green space in a local or neighbourhood plan. The Order Limits do not include any Local Green Space designations, and this is therefore not considered any further within the PPS.
4.10.14	Applicants should consider the economic and wider benefits of land and seek to minimise impacts on Best	Paragraph 4.4.277 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.10.14 of

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	and Most Versatile (BMV) agricultural land. Where development on agricultural land is necessary, lower-quality land (Grades 3b, 4 and 5) should be used in preference to higher-quality land where possible, unless this conflicts with other sustainability objectives. Agricultural land assessments should be supported by survey data confirming land classification. Applicants should also assess impacts on soil health and identify appropriate mitigation measures to minimise those effects.	the NPSWRI, providing assessment at paragraphs 4.4.278 – 4.4.287. ES Chapter 4, Consideration of alternatives [APP-083] considers the need to reduce impacts on BMV land. Paragraph 4.10.14 is referenced in Table 12-1 of ES Chapter 12 Land use and agriculture [APP-091]. Section 12.3 sets out considerations of land use and agricultural topics within the scoping. Data on topics including recreational building and land and BMV agricultural land is included in section 12.7. Section 12.8 included the assessment of effects on BMV agricultural land. Paragraph 12.5.21 includes information on supporting agricultural land surveys.
4.10.15	Applicants should undertake a preliminary assessment of ground instability as early as possible and carry out any necessary investigations to confirm that the site is, or can be made, stable throughout the development's lifetime. The assessment should consider risks such as subsidence, landslides, land compression, and impacts on neighbouring land and property, as well as risks to groundwater quality and quantity. This may be presented through a land stability or slope stability risk assessment, with further guidance provided in Planning Practice Guidance (PPG).	Paragraph 4.4.288 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.10.15 of the NPSWRI sets out when preliminary assessment of ground stability is require with reference to ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1). Paragraphs 4.4.291 – 4.4.292 specifically address the proposed WRP site. Paragraph 4.10.15 is referenced in Table 12-1 of ES Chapter 12, Land use and agriculture [APP-091].

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
4.10.16	Applicants should assess whether the proposal affects mineral safeguarding areas or other mineral resource considerations and consult the relevant Mineral Planning Authority regarding potential impacts.	Paragraph 4.4.293 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.10.16 of the NPSWRI providing assessment at paragraphs 4.4.294 – 4.4.298. ES Chapter 16 Resources and waste management [APP-095] and ES Appendix 16.1 Mineral Safeguarding Assessment [APP-183] assesses the impacts of the development on MSAs. Section 16.8 ES Chapter 16 Resources and waste management [APP-095] presents findings from the assessment of significance of impacts, focusing on likely significant effects on minerals. Section 16.4 outlines mitigation. Paragraph 4.10.16 is referenced in Table 12-1 of ES Chapter 12 Land use and agriculture [APP-091] which notes that Effects on Mineral Safeguarding Areas (MSAs) are considered in ES Chapter 16 Resources and waste management [APP-095]
Mitigation		
4.10.17	The effects of a project on existing or proposed land uses can be reduced through the application of good design	Paragraphs 4.4.300 and 4.4.301 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), address paragraph 4.10.17 of the NPSWRI with reference to

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	principles, including careful site layout and measures to protect soils during construction.	applied good design principles are included in the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) and Soil management measures are set out in the Outline Soil Resource Management Plan (SRMP), which forms Appendix B of the Outline Construction Environmental Management Plan - 1 of 3 documents [APP-412]. Paragraph 4.10.17 is referenced in Table 12-1 of ES Chapter 12 Land use and agriculture [APP-091]. Section 12.4 sets out primary and tertiary mitigation measures. Secondary measures are included in section 12.9.
4.10.18	Where green infrastructure is affected, applicants should seek to maintain its functionality and connectivity. Mitigation measures should minimise adverse impacts and, where possible, enhance green infrastructure networks, open spaces, National Trails, and other public rights of way.	Paragraphs 4.4.302 – 4.34.304 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) address these paragraphs with reference to: • Section 17.8, ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1), consider impacts to open space and Public Rights of Way (PRoW). Section 17.4 details designs to reduce impacts. • Section 18.8, ES Chapter 18, Traffic and transport [APP-097] assesses impacts on PRoW, National Trails and other rights of access to land for recreation.
4.10.19	The SoS must consider whether adverse effects on green infrastructure or open space are adequately mitigated through requirements, planning obligations, exchange land, or management and maintenance arrangements. Any exchange land should be of equivalent or better size, quality, usefulness, attractiveness and accessibility. Where applicable,	

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	replacement land must comply with Sections 131 and 132 of the Planning Act.	• The Framework RoWMP (Appendix B of the Framework CTMP) [APP-415] outlines the temporary and permanent closures and/or diversions to the PRoW network associated with the construction of the Project. Paragraph 4.10.18 is referenced in Table 12-1 of ES Chapter 12 Land use and agriculture [APP-091]. Section 12.4 sets out primary and tertiary mitigation measures. Secondary measures are included in section 12.9 Coordination of ENG and BNG opportunities across the project is discussed in the Indicative Environmental Masterplan, Appendix C of the Design Approach Document [APP-078 and APP-079 – 2 of 3 documents], Green infrastructure policy requirements inform the protected habitat and species mitigation as demonstrated in section 8.4 of ES Chapter 8, Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1).
4.10.20	Where development sterilises land and restricts future uses, mitigation may be achieved through alternative uses such as nature conservation, wildlife corridors, or the provision of benefits associated with blue infrastructure.	
4.10.21	Public rights of way, National Trails, and other access routes are important recreational assets. Applicants should mitigate adverse impacts on these routes and, where possible, create opportunities to improve or provide new access. Any proposed changes should consider the existing route's use, character, attractiveness and convenience. The SoS should assess whether proposed mitigation is acceptable and whether it should be secured through development consent requirements or other provisions.	
Decision making		
4.10.22	Where a project conflicts with an adopted or emerging development plan, the SoS should consider how advanced the plan is within the adoption process. Greater weight should be given to plans that are closer	Paragraph 4.4.305 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.10.22 of the NPSWRI noting the role of the adopted and emerging development plan in the DCO process. This is addressed

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	to formal adoption when assessing the significance of any conflict.	in the PPS at section 1.5 in setting out the decision-making framework for the Project. Paragraph 4.10.22 is referenced in Table 12-1 of ES Chapter 12 Land use and agriculture [APP-091].
4.10.23	Development consent should not normally be granted for proposals affecting existing open space, sports facilities, recreational land, or playing fields unless an assessment demonstrates that they are no longer needed. Alternatively, consent may be justified where the benefits of the project, including its need, outweigh the loss and where suitable replacement, enhancement or compensatory facilities are provided.	Paragraph 4.4.307 of the PPS (Document reference 5.5, Volume 5, Version 2) refers to paragraph 4.10.23 of the NPSWRI notes when the SoS should not grant consent for development on existing open space, land used for sports and recreational purposes. Paragraph 4.4.309 of the PPS (Document reference 5.5, Volume 5, Version 2) notes the relevance of ES Chapter 12 Land use and Agriculture [APP-091], specifically section 12.8.85 which refers to the example of Wickham Park Golf Club which has medium sensitivity as a receptor to impacts of development. Paragraph 4.10.23 is referenced in Table 12-1 of ES Chapter 12 Land use and agriculture [APP-091]. Section 12.8 considers direct and indirect impacts on community facilities/social infrastructure including space used for sports.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		Information on recreation and health is also provided in ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume, Version 1). Section 17.8 considers effects in human health due to impacts on recreational land and facilities.
4.10.24	Where networks of green infrastructure or blue infrastructure are identified in development plans, they should generally be protected from development and, where possible, enhanced or incorporated into proposals. The SoS should also consider any existing land contamination and the effectiveness of the proposed mitigation measures.	Paragraph 4.4.312 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.10.24 of the NPSWRI encouraging the strengthening and integration of identified green and blue infrastructure networks. ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) considers networks of green and blue infrastructure. Paragraph 4.10.24 is referenced in Table 12-1 of ES Chapter 12 Land use and agriculture [APP-091].
4.10.25	The SoS should take account of the economic and wider benefits of Best and Most Versatile (BMV) agricultural land and ensure that applicants have proposed suitable mitigation measures to minimise impacts on soils and soil resources.	Paragraph 4.4.314 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.10.25 of the NPSWRI notes factors including economic benefits and mitigation of impacts on soils that the SoS will consider. Paragraph 4.10.25 is referenced in Table 12-1 of ES Chapter 12 Land use and agriculture [APP-091]. Section 12.7 includes Findings from the land use assessment,

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		including effects in BMV land. Section 12.8 assesses impacts on Community land and facilities throughout the development's lifespan. Section 12.4 discuses primary and tertiary mitigation measures for BMV land, section 12.5 includes assessment of effects on BMV land and section 12.8 provides information on agricultural land surveys.
4.10.26	Projects located within the Green Belt may constitute inappropriate development. There is a strong presumption against such development unless very special circumstances exist. The SoS must determine whether the benefits of the proposal clearly outweigh the harm caused to the Green Belt and any other adverse impacts. Significant weight should be given to Green Belt harm when making this assessment.	Paragraph 4.4.246 of the PPS (Document reference 5.5, DCO Volume 5, Version 2). refers to paragraph 4.10.26 noting that As the Order Limits are not located within the Green Belt, this is not considered any further within the PPS.
4.10.27	When considering impacts on coastal recreation sites and features, the SoS should expect applicants to maintain and enhance public access to the coast. Consideration should also be given to supporting the continuous managed coastal route promoted through the Marine and Coastal Access Act 2009.	Paragraph 4.4.315 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.10.27 of the NPSWRI, which notes the requirement of the SoS to consider impacts on maintaining coastal recreation sites. The maintenance of coastal access is considered in the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1), Design Approach Document [APP-077] - APP-079] and ES Chapter 4 Consideration of alternatives [APP-083].

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
4.10.28	Where development affects a mineral safeguarding area, the SoS must be satisfied that appropriate mitigation or compensation measures have been proposed to protect mineral resources.	Existing land contamination is considered in ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1). ES Chapter 16 Resources and waste management [APP-095] and ES Appendix 16.1 Mineral Safeguarding Assessment (MSAs) [APP-183], assesses the impacts of the development on MSAs. Section 16.8 presents findings from the assessment of significance of impacts, focusing on likely significant effects on minerals and section 16.4 outlines mitigation.

5.11 Noise and Vibration

Table 5.11 Noise and Vibration

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
Introduction		
4.11.1	Excessive noise can affect human health and quality of life through impacts such as annoyance, sleep disturbance and cardiovascular disease, as well as affecting enjoyment of tranquil areas, landscapes and biodiversity. Government policy is set out in the Noise Policy Statement for England. For the purposes of this section, references to noise also include vibration, which can affect people and cause damage to buildings.	Paragraphs 4.4.317 – 4.4.318 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.11.1 of the NPSWRI as introductory context. Paragraph 4.11.1 of the NSPWRI is referenced in ES Chapter 15 Noise and vibration, [APP-094], paragraph 15.2.4, Table 15-2, listing the relevant national policy. This notes that measures to be employed in mitigating the effects of vibration are described in section 15.4 and section 15.9 of that chapter. The assessment of vibration related effects is described in section 15.8.
4.11.2	The significance of noise impacts depends on the level and characteristics of construction and operational noise, the proximity of noise-sensitive receptors such as homes, schools and hospitals, the presence of valued tranquil landscapes and soundscapes, and the potential effects on designated sites, protected species and wildlife.	Paragraphs 4.4.320 – 4.4.324 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.11.2 of the NPSWRI cross referring to ES Chapter 15 Noise and vibration, [APP-094], ES Chapter 13 Landscape and visual [APP-092], (in relation to tranquillity) and ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1), and ES Chapter 9 Marine biodiversity, (Document reference 6.1, DCO Volume 6, Version 1) provide details of potential effects of noise and vibration on protected species,

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		designations and habitats and on underwater noise and vibration effects.
Applicant's assessment		
4.11.3	Where significant noise effects may arise, the applicant should include a noise assessment within the ES. This should describe noise-generating activities, identify sensitive receptors and characteristic of the existing noise environment, assess construction and operational noise effects at different times and seasons, consider impacts on health, wellbeing, wildlife and underwater or subterranean environments where relevant, and identify mitigation measures, including the use of best available techniques to reduce noise.	Paragraphs 4.4.325 – 4.4.327of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.11.3 and 4.11.4of the NPSWRI discusses the inclusion of a noise assessment. Paragraph 4.11.3 of the NSPWRI is referenced in ES Chapter 15 Noise and vibration, [APP-094], paragraph 15.2.4, Table 15-2, listing the relevant national policy. This notes that a description of the noise and vibration sources associated with the Proposed Development included in the assessment of changes in noise environment are described in section 15.5 of that chapter. The characteristics of the existing noise environment are described in section 15.7. Measures to be employed in mitigating the effects of noise are described in section 15.4 and section 15.9. The assessment of effects has considered changes in the short and long-term and at particular times, as described in section 15.8. Chapter 15 also cross refers to ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1), which has considered noise impacts in the assessment of potential effects on health and wellbeing. Also, underwater noise and vibration
4.11.4	The scope and detail of the noise assessment should be proportionate to the scale and significance of the likely noise impacts.	

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		effects on biodiversity have been considered in ES Chapter 8 Terrestrial and freshwater biodiversity, (Document reference 6.1, DCO Volume 6, Version 1) and ES Chapter 9 Marine biodiversity, (Document reference 6.1, DCO Volume 6, Version 1).
4.11.5	The assessment should also consider noise arising from associated activities, including increased road, rail or other transport movements generated by the development.	Paragraph 4.4.328 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.11.5 of the NPSWRI ES Chapter 15 Noise and vibration, [APP-094], paragraph 15.2.4, Table 15-2, Listing the relevant national policy. Section 15.5 of that chapter confirms that road traffic noise impacts from the construction and decommissioning phases of the Proposed Development are included in the assessment scope, and this assessment is provided in section 15.8.
4.11.6	Construction noise should be predicted, assessed and managed using relevant British Standards and associated guidance, which provides examples of mitigation measures. Operational noise affecting people should likewise be assessed in accordance with relevant British Standards and recognised guidance.	Paragraph 4.4.330 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.11.6 of the NPSWRI cross referencing to ES Chapter 15 Noise and vibration, [APP-094]. Paragraph 4.11.6 of the NSPWRI is referenced in ES Chapter 15 Noise and vibration, [APP-094], paragraph 15.2.4, Table 15-2, Listing the relevant national policy which notes that the relevant British Standards and other guidance to the assessments are identified in this section

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		15.2 of that chapter and that the assessment methodology, described in section 15.5 of that chapter, has been developed in line with the requirements of guidance and British Standards identified in Table 15-4.
4.11.7	Applicants should consult the relevant authority on the scope of the noise assessment and proposed mitigation. Natural England should be consulted on impacts to protected species and wildlife, while the Environment Agency, Marine Management Organisation, Natural Resources Wales and NatureScot should be consulted where marine noise impacts may occur. Survey results may contribute to ecological assessments, with consideration given to the seasonal presence of affected species.	Paragraph 4.4.332 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.11.7 of the NPSWRI cross referring to ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) and ES Chapter 9 Marine biodiversity (Document reference 6.1, DCO Volume 6, Version 1) and consultations with the Environment Agency, Natural England and the MMO. Paragraph 4.11.7 of the NSPWRI is referenced in ES Chapter 15 Noise and vibration, paragraph 15.2.4, Table 15-2 [APP-094], identifying ES Chapter 8 and ES Chapter 9 as relevant chapters discussing these topics. (Document reference 6.1, DCO Volume 6, Version 1).
Mitigation		
4.11.8	Noise mitigation should be proportionate and reasonable, possible including reducing noise at source, containing noise through engineering measures, using quieter materials, designing layouts that separate noise sources from sensitive receptors, incorporating screening through landforms, barriers or buildings, and restricting activities or operating hours during construction and operation where necessary.	Paragraph 4.4.334 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.11.8 of the NPSWRI setting out the approach to mitigation at paragraphs 4.4.335 – 4.4.340. Paragraph 4.11.8 of the NSPWRI is referenced in ES Chapter 15 Noise and vibration, [APP-094], paragraph 15.2.4, Table 15-2, Listing the relevant national policy.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
4.11.9	Noise mitigation and assessment should take account of the seasonal presence and behaviour of wildlife in nearby designated sites, as impacts may vary throughout the year.	Paragraphs 4.4.335 – 4.4.340 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) set out the approach to noise mitigation. Paragraph 4.11.9 of the NSPWRI is referenced in ES Chapter 15 Noise and vibration, [APP-094], paragraph 15.2.4, Table 15-2, listing the relevant national policy noting mitigation measures are set out at section 15.4 of that chapter.
4.11.10	Where all other noise mitigation options have been exhausted, the SoS may consider requiring improved sound insulation for noise-sensitive receptors as an additional mitigation measure	Paragraph 4.4.340 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.11.10 of the NPSWRI which notes that in certain situations the SoS could consider noise mitigation through improved sound insulation. Paragraph 4.11.10 of the NSPWRI is referenced in ES Chapter 15 Noise and vibration [APP-094] at paragraph 15.2.4 and in Table 15-2 noting mitigation measures are set out at section 15.4 of that chapter.
Decision making		
4.11.11	Development proposals must comply with statutory noise requirements and have regard to the Noise Policy Statement for England, the National Planning Policy Framework (NPPF) and the Government's associated Planning Practice Guidance on Noise.	Paragraph 4.4.342 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.11.11 of the NPSWRI which advises that the development is undertaken in accordance with statutory requirements for noise – cross referring to ES Chapter 15 Noise and vibration, [APP-094] at paragraph 4.4.341.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		Paragraph 4.11.11 of the NSPWRI is referenced in ES Chapter 15 Noise and vibration, paragraph 15.2.4, Table 15-2, listing the relevant national policy [APP-094] which notes that due regard has been given to the noise elements of these policy documents in the development of the assessment methodology described in section 15.5.
4.11.12	Developments should demonstrate good design by selecting the most acceptable soundscape, containing noise within buildings where possible, optimising layouts to minimise noise emissions, and using landscaping, bunds or noise barriers to reduce noise transmission.	Paragraph 4.4.344 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.11.12 of the NPSWRI cross referring to ES Chapter 15 Noise and vibration, [APP-094] and the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). Paragraph 4.11.12 of the NSPWRI is referenced in ES Chapter 15 Noise and vibration, paragraph 15.2.4, Table 15-2, listing the relevant national policy [APP-094].
4.11.13	The SoS should only grant consent where effective noise management will: avoid significant adverse effects on health and quality of life, minimise other adverse impacts, and where possible contribute to improvements in health and quality of life, consistent with Government policy on sustainable development.	Paragraph 4.4.345 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.11.13 of the NPSWRI which states that development consent should not be granted unless the SoS is satisfied the listed aims are met – as addressed at paragraph 4.4.346. Paragraph 4.11.13 of the NSPWRI is referenced in ES Chapter 15 Noise and vibration, paragraph 15.2.4, Table 15-2, Listing the relevant national policy [APP-094] noting that the noise and vibration assessment in section 15.8 identifies the potential for significant adverse impacts on health and quality of life to occur. Sections 15.4 and 15.9

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		of that chapter identify the mitigation that will be implemented to reduce adverse impacts. Section 15.10 summarises residual effects and shows that, with the identified mitigation, significant adverse impacts on health and quality of life are not anticipated.
4.11.14	When determining an application, the SoS should consider mitigation for both construction and operational noise and may impose requirements to ensure these measures are delivered and that actual noise levels remain consistent with assessments.	Paragraph 4.4.347 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to Chapter 4.11.14 of the NPSWRI setting out the approach to mitigation at paragraph 4.4.348. Paragraph 4.11.14 of the NSPWRI is referenced in ES Chapter 15 Noise and vibration, paragraph 15.2.4, Table 15-2, Listing the relevant national policy [APP-094] in relation to measures to be employed in mitigating the effects of noise and vibration and the securing mechanisms are described in section 15.4 and section 15.9.
4.11.15	Applicants should propose appropriate mitigation measures to minimise the impact of noise emissions on local amenity.	Paragraph 4.4.350 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.11.15 of the NPSWRI setting out the approach to mitigation at paragraph 4.4.351 – 4.4.353. Paragraph 4.11.15 of the NSPWRI is referenced in ES Chapter 15 Noise and vibration, paragraph 15.2.4, Table 15-2, Listing the relevant national policy [APP-094] in relation to measures to be employed in mitigating the effects of noise and vibration and the securing

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		mechanisms are described in section 15.4 and section 15.9.
4.11.16	Where activities require an Environmental Permit, the SoS may assume the permitting regime will control relevant noise impacts. However, all noise sources must still be considered when deciding whether development consent should be granted and under what conditions.	Paragraph 4.4.354 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.11.16 of the NPSWRI notes that the SoS can assume the regime for environmental permits exercises the necessary control over noise impacts but must consider potential impact from all noise sources. Paragraphs 4.4.354 and 4.4.355 address this policy requirement.

5.12 Resource and Waste Management

Table 5.12 Resource and Waste Management

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
Introduction		
4.12.1	Government policy on hazardous and non -hazardous waste seeks to protect human health and the environment by reducing waste generation and promoting resource efficiency. The SoS should also have regard to waste reduction and resource efficiency objectives established under the Environment Act 2021 and the Government's Environmental Improvement Plan.	Paragraph 4.4.380 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), notes that schedule 2 of the draft DCO [APP-023] includes the requirement for the appointed Contractor to prepare a Site Waste Management Plan (SWMP), (Construction Environmental Management Plan (CEMP) (Document reference 7.1, DCO Volume 7, Version 1) [APP-413] and [APP-414], Materials management plan (MMP) and Soil Resource Management Plan (SRMP).
4.12.2	Sustainable waste management should follow the waste hierarchy, prioritising prevention, reuse, recycling and recovery before disposal.	Paragraphs 4.4.357 and 4.4.366 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) refers to paragraph 4.12.2 of the NPSWRI which sets out the waste hierarchy. Paragraphs 4.12.2 and 4.12.3 are referenced in Table 16-2 of ES Chapter 16 Resources and waste management [APP-095]. Additionally, section 16.4 has integrated the requirements into tertiary mitigation. This explains that this requirement has been incorporated into the tertiary mitigation which is outlined in section 16.4 of that chapter. Measures

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		included in the Outline Construction Environmental Management Plan (CEMP) (Document reference 7.1, DCO Volume 7, Version 1) [APP-413 APP414 set out how reuse and waste minimisation measures are incorporated into the Project.
4.12.3	A different approach to the waste hierarchy may be justified where a life-cycle assessment demonstrates that an alternative option would deliver the best overall environmental outcome.	Paragraph 4.4.358 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) refers to paragraph 4.12.3 of the NPSWRI which advises deviation from the hierarchy is possible if an alternative approach with a better outcome is demonstrated. This paragraph of the PPS also states that the Outline Construction Environmental Management Plan (CEMP) (Document reference 7.1, DCO Volume 7, Version 1) [APP-413 APP414 sets out reuse and waste minimisation measures are incorporated into the Project. Paragraphs 4.12.2 and 4.12.3 are referenced in Table 16-2 of ES Chapter 16 Resources and waste management [APP-095]. Section 16.4 has integrated the requirements into tertiary mitigation.
4.12.4	Water resources infrastructure can generate both hazardous and non-hazardous waste during construction and operation. Applicants should consult the relevant waste planning authority and waste operators to ensure sufficient management capacity is	Paragraph 4.4.360 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), states that ES Chapter 16 Resources and waste management [APP-095] section 16.5 confirms that potential waste from the Project has been assessed against the landfill

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	available. Some activities are regulated through the Environmental Permitting regime, administered by the Environment Agency. When applying for an environmental permit the application must demonstrate processes in place to meet relevant requirements.	capacity likely to be available in the years in which the waste is generated.
4.12.5	As waste producers, applicants have a legal duty of care to ensure waste is managed appropriately. This includes preventing unlawful disposal, ensuring permits are in place where required, preventing waste escape, transferring waste only to authorised persons and providing accurate waste descriptions.	Paragraphs 4.4.363 and 4.4.362 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), confirms that the measures set out in paragraph 4.12.5 of the NPS will be included within the SWMP which is a requirement of the Outline Construction Environmental Management Plan (CEMP) (Document reference 7.1, DCO Volume 7, Version 1) [APP-413] and [APP-414].
Applicant's assessment		
4.12.6	Applicants should explain how waste will be managed throughout the development and, where relevant, prepare a Site Waste Management Plan and Materials Management Plan. These should set out proposed recovery and disposal arrangements and explain any alternatives considered.	Paragraph 4.4.364 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.12.6 of the NPSWRI requiring applicants set out the arrangements proposed for managing waste produced in the development application. Paragraph 4.3.35 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to Paragraph 4.3.12 of the NPSWRI in consideration of alternative in relation to waste recovery and disposal.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		Paragraph 4.12.6 is referenced in Table 16-2 of ES Chapter 16 Resources and waste management [APP-095]. Section 16.4 has integrated the requirements into tertiary mitigation. Coordination for site materials and waste management are detailed within the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1) [APP-413] and [APP-414]. A Materials Management Plan (MMP) and Site Waste Management Plan (SWMP) will be prepared by the Contractor.
4.12.7	Applicants must demonstrate that waste will be managed in accordance with the waste hierarchy and that excavated materials such as soil and rock will be reused wherever possible through a Materials Management Plan or Soil Management Plan. They should also show how duty of care requirements will be met and how waste generation and disposal volumes will be minimised unless another option is demonstrably more sustainable environmentally, socially and economically over the project's entire lifetime.	Paragraph 4.4.366 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.12.7 of the NPSWRI requiring applicants to demonstrate all waste produced by the facility follows the waste hierarchy and that excavated material from construction will be reused. Paragraph 4.12.7 is referenced in Table 16-2 of ES Chapter 16 Resources and waste management [APP-095]. Section 16.4 has integrated the requirements into tertiary mitigation demonstrating that reuse and waste mitigation has been included in the design. The Outline Construction Environmental Management Plan (CEMP) Document reference 7.1,

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		DCO Volume 7, Version 1) APP-413 APP414 requires that the contractor will produce, implement and maintain a Site Waste Management Plan (SWMP).
Mitigation		
4.12.8	Applicants should provide a comprehensive package of mitigation measures aimed at eliminating or significantly reducing risk of adverse effects associated with resource use and waste management.	Paragraph 4.4.369 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.12.8 of the NPSWRI cross referring to mitigation measures as set out at paragraphs 4.4.370 to 4.4.372. Paragraph 4.12.8 is referenced in Table 16-2 of ES Chapter 16 Resources and waste management [APP-095]. Suitable mitigation measures that meet this requirement are then detailed in sections 16.4 and 16.9.
Decision making		
4.12.9	The SoS should consider whether the applicant has established an effective process for managing hazardous and non-hazardous waste throughout the development's life. This should demonstrate that waste can be managed appropriately on and off site, that sufficient waste infrastructure capacity exists, and that waste generation and disposal have been minimised wherever possible.	Paragraphs 4.4.374 to 4.4.379 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) address paragraph 4.12.9 of the NPSWRI. Paragraph 4.12.9 is referenced in Table 16-2 of ES Chapter 16 Resources and waste management [APP-095]. Sections 16.8 shows the significance of impacts on waste management, focusing on the assessment

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		of likely significant effects. Mitigation is then outlined in sections 16.4 and 16.9.
4.12.10	Where necessary, the SoS should use planning requirements or obligations to ensure that appropriate waste management mitigation measures are implemented.	Paragraph 4.4.380 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.12.10 of the NPSWRI which notes that where necessary, the SoS should use requirements or obligations to ensure appropriate mitigations are implemented – referring to Schedule 2 of the draft DCO APP-023

5.13 Socio-Economic Impacts

Table 5.13 Socio-Economic Impacts

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
Introduction		
4.13.1	The construction and operation of water resources infrastructure can have both short- and long-term economic and social effects on communities, businesses and services. While reservoir construction can be lengthy, reservoirs can also provide lasting recreational and educational benefits. Applicants	Paragraph 4.4.381 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraphs 4.13.1 and 4.13.2 of the NPSWRI discussing potential local employment opportunities during construction and operational phases.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	should seek to maximise local employment opportunities during both construction and operation, as referenced in Section 4.10 on Land Use, Open Space, Green Infrastructure and Green Belt.	Paragraph 4.13.1 is referenced in Table 17-2 of ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1).
4.13.2	Water resources infrastructure may create opportunities to supply water directly to local businesses, including industrial and agricultural users. Potential demand can be identified through engagement with communities, local authorities, business forums, regional water resources groups, and water resources management plans.	
Applicant's assessment		
4.13.3	Applicants should describe existing socio-economic conditions and demographics in the surrounding area, following consultation with affected parties, and explain how impacts relate to local planning policies. Any likely significant socio-economic and equalities effects should be assessed within the ES.	Paragraph 4.4.382 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.13.3 of the NPSWRI which cross refers to Chapters 12 and 18 of the ES. Paragraph 4.13.3 is referenced in Table 17-2 of ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1). Section 17.8 considers employment and training opportunities created from the development and in the wider local and regional areas.
4.13.4	Applicants should describe the existing socio-economic conditions in the areas surrounding the proposed	Paragraph 4.4.384 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	development, following appropriate consultation, and should refer to how the development's socioeconomic impacts correlate with local planning policies. The applicant should also describe the existing demographics within the area and assess how the development could affect any equalities groups. Applicants should assess any likely significant positive and negative socio-economic or equalities impacts as part of an ES.	4.13.4 of the NPSWRI with cross reference to the EqIA (Document reference 7.13, DCO Volume 7, Version 1). Paragraph 4.13.4 is referenced in Table 17-2 of ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 1, Version 1). Section 17.7 of ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1) provides a demographic baseline from which the data relating to equalities is provided in the Equality Impact Assessment (EqIA) (Document reference 7.13, DCO Volume 7, Version 1).
4.13.5	The assessment should consider socio-economic effects relevant to the development, including employment and training opportunities, educational and visitor facilities, impacts on tourism, local businesses and services, and opportunities to provide direct water supplies to local businesses.	Paragraph 4.4.385 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) refers to paragraph 4.13.5 of the NPSWRI with assessment at 4.4.386 – 4.4.387. Paragraph 4.13.5 is referenced in Table 17-2 of ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1). Section 17.8 of ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1) considers employment and training opportunities created from the development

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		and in the wider local and regional areas and its impact on strategic tourism receptors.
4.13.6	Socio-economic effects may arise from, or be linked to, other impacts such as visual effects, public perceptions of development, and impacts on local businesses and the wider economy. Where relevant, these impacts should be included in the assessment.	Paragraph 4.4.388 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) refers to paragraph 4.13.6 of the NPSWRI, which notes that socio-economic impacts may link to other impacts. Paragraph 4.13.6 is referenced in Table 17-2 of ES Chapter 17 Socio-economics, tourism and health (Document Reference 6.1, DCO Volume 6. Version 1). Section 17.8 this chapter also considers the impact on strategic tourism receptors from in-combination effects on their amenity.
4.13.7	Applicants should assess cumulative effects on communities, particularly where multiple infrastructure projects may be delivered within the same region and timeframe. Such circumstances could create short-term pressures, including increased competition for construction workers and resources.	Paragraph 4.4.389 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) refers to paragraph 4.13.7 of the NPSWRI noting the requirements relevant to assessing cumulative effects. ES Chapter 20 Cumulative and in-combination effects [APP-099] provides a cumulative effects assessment.
4.13.8	Applications for reservoirs must be supported by a Recreational Amenities Statement outlining proposed facilities. Information gathered through assessments undertaken under Sections 4.13 and 3.12 may help justify these proposals. The Water Industry Act 1991	This paragraph is not applicable as the project does not propose a new reservoir.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	also places duties on water companies regarding the provision of recreational facilities.	
Mitigation		
4.13.9	The SoS should consider whether proposed mitigation measures adequately address adverse socio-economic impacts. The example of measures such as high-quality design and landscape screening can improve the experience of both local communities and visitors is provided.	Paragraph 4.4.391 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to paragraph 4.13.9 of the NPSWRI and provides a summary of mitigation measures at Table 4-10 and paragraphs 4.4.395 – 4.4.395. Paragraph 4.13.9 is referenced in Table 17-2 of ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1). Section 17.4. sets out primary and tertiary measures and secondary measures are set out in section 17.9.
Decision making		
4.13.10	The SoS should consider proposed mitigation measures, planning obligations, community investment and development phasing to reduce negative socio-economic impacts. Development should integrate effectively with existing businesses and community facilities, avoid imposing unreasonable restrictions on them, and include mitigation where existing nearby activities could adversely affect the new infrastructure.	Paragraphs 4.4.397 and 4.4.404 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to and provide policy analysis agains paragraphs 4.13.10 of the NPSWRI. Table 17-2 of ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1) references paragraph 4.13.10.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		Section 17.8 of ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1) considers impacts on businesses and community facilities/ social infrastructure.
4.13.11	The decisionmaker should consider any equalities impacts arising from the development and determine whether the applicant's proposed mitigation measures are sufficient or whether additional mitigation is required.	Paragraph 4.4.406 of the PPS (Document reference 5.5, DCO Volume 5, Version 2), refers to Chapter 4.13.11 of the NPSWRI requiring the consideration of equality impacts by the decision maker and whether proposed mitigation measures are acceptable. Equality impacts are addressed throughout the Equality Impact Assessment (EqIA) (Document reference 7.13, DCO Volume 7, Version 1).

5.14 Traffic and Transport

Table 5.14 Traffic and Transport

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
Introduction		
4.14.1	The construction and operation of water resources infrastructure can affect surrounding and connected	Paragraph 4.4.408 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) notes that ES

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	transport networks through a range of economic, social and environmental impacts arising from the movement of materials, goods and personnel	Chapter 18 Traffic and transport [APP-097] provides the assessment of the likely significant effects on traffic and transport from the construction, operation and decommissioning of the Project.
4.14.2	Transport associated with water resources infrastructure can generate environmental impacts, particularly through increased road traffic, leading to higher levels of noise, air pollution and greenhouse gas emissions.	Paragraph 4.4.409 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) notes the potential impacts from increased use of roads. Paragraph 4.4.410 sets out that ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1) provides an assessment of the effects associated with exhaust emissions from construction vehicles. Paragraph 4.4.411 then references noise and vibration impacts. Table 18-2 of ES Chapter 18 Traffic and transport [APP-097] references paragraph 4.14.2 of the NPSWRI, signposting section 18.8 where paragraph 4.14.2 is addressed. The assessment of likely significant effects arising from construction traffic with regards to driver and bus passenger delay and abnormal loads is set out in section 18.8.
4.14.3	The level of traffic disturbance and impacts from abnormal loads during construction will depend on the scale, nature and location of the proposed development.	Section 18.8 of ES Chapter 18 Traffic and Transport [APP-097] sets out the assessment of likely significant effects arising from construction traffic.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		Table 18-2 of ES Chapter 18 Traffic and Transport [APP-097] references paragraph 4.14.3 of the NPSWRI, signposting section 18.8 where paragraph 4.14.3 is addressed.
4.14.4	Assessing and mitigating transport impacts is an important part of delivering sustainable development and achieving the objectives of the government's Transport Decarbonisation Plan.	Section 18.4 of ES Chapter 18 Traffic and transport [APP-097] sets out the primary and tertiary mitigation measures of the Project in response to this paragraph.
Applicant's assessment		
4.14.5	Where a project is likely to have significant transport impacts, applicants should include a transport appraisal within the ES. The appraisal should follow the Department for Transport's (DfT) Transport Analysis Guidance (TAG) and adopt a vision-led approach that prioritises modal shift towards sustainable transport and uses transport measures to reduce the scheme's impacts.	Paragraph 4.4.417 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) notes projects that have significant transport implications to include an appraisal in the ES and paragraph 4.4.418 confirms that ES Chapter 18 Traffic and transport [APP-097] and ES Appendix 18.1 Transport Assessment [APP-186] – [APP-188] assess the extent of the projects transport impact. Paragraph 4.4.419 of the PPS cross references to the Framework Construction Worker Travel Plan (Framework CWTP), which is appended to the Framework CTMP [APP-415].
4.14.6	Applicants should engage with relevant transport bodies, including National Highways, Network Rail, and the	Paragraph 4.4.420 to 4.4.424 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) confirms

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	relevant Highway Authorities, when assessing impacts and identifying mitigation measures.	that the relevant transport bodies were consulted on the Project. Table 18-2 of ES Chapter 18 Traffic and transport [APP-097] references paragraph 4.14.6 of the NPSWRI, signposting section 18.3 where paragraph 4.14.6 is addressed. The approach to engagement is detailed in section 18.3 and includes engagement with Network Rail, National Highways and the relevant local highways authorities (i.e. HCC and PCC).
4.14.7	The applicant should prepare a Construction Management Plan for the construction phase and a Travel Plan for operation, both incorporating demand management and monitoring measures to reduce transport impacts. These plans should promote walking, wheeling, cycling, public transport and shared transport to reduce parking demand, support transport decarbonisation, minimise the need to travel, encourage behavioural change and modal shift, and mitigate wider transport effects.	Paragraph 4.4.426 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) states that the Framework CTMP [APP-415] includes details of how traffic will be monitored. Table 18-2 of ES Chapter 18 Traffic and transport [APP-097] references paragraph 4.14.7 of the NPSWRI, signposting section 18.4, where paragraph 4.14.7 is addressed. Paragraph 4.4.425 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) requires the applicant to prepare a Construction Management plan and Travel Plan, which includes monitoring measures. Supporting documents, including a Framework Construction Traffic Management Plan (CTMP) and the appended Framework Construction

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		Worker Travel Plan (CWTP) [APP-415] have been discussed with NH and the relevant LHAs, as detailed in section 18.4 of Chapter 18.
4.14.8	Transport assessments should consider potential disruption to existing transport services and infrastructure, including roads, railways and airports.	Paragraph 4.4.429 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) notes the requirements of paragraph 4.14.8 of the NPSWRI. A Transport Assessment has been prepared and appended to ES Appendix 18.1 Transport Assessment [APP-186] - [APP-188]. Table 18-2 of ES Chapter 18 Traffic and transport [APP-097] signposts to section 18.8 which addresses paragraph 4.14.8. The assessment of likely significant effects arising from possible disruption to services and infrastructure is set out in section 18.8.
4.14.9	Where additional transport infrastructure is required, it should incorporate high-quality infrastructure for walking, wheeling and cycling, together with supporting facilities such as cycle storage and changing facilities.	Paragraph 4.4.431 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) states that this is not considered to be relevant to the Project as the only additional transport infrastructure is the diversion of a Public Right of Way.
4.14.10	Applicants should discuss potential opportunities for government co-funding with relevant network providers where wider third-party benefits may arise. Although government guidance explains when this may be	

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	possible, future funding availability cannot be guaranteed.	
4.14.11	Where transport impacts are likely to be significant, the ES should also include a detailed transport assessment.	Table 18-2 of ES Chapter 18 Traffic and transport [APP-097] references paragraph 4.14.11 and signposts to ES Appendix 18.1 Transport Assessment [APP-186] - [APP-188], which has been prepared to accompany ES Chapter 18 Traffic and transport [APP-097].
Mitigation		
4.14.12	Where mitigation is required, applicants should consider demand management measures that reduce travel impacts. This may include reducing the need to travel through trip consolidation, locating development where active travel and public transport are already available, supporting shared mobility, encouraging a shift to more sustainable transport modes, moving journeys outside peak periods, and directing travel onto less congested parts of the transport network.	Paragraph 4.4.431 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) notes that where mitigation is needed, possible demand management measures must be considered. Paragraph 4.4.432 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) states that Section 18.4 of ES Chapter 18 Traffic and transport [APP-097] sets out details of primary and tertiary mitigation including demand management measures. This includes the Framework CWTP which is appended to the Framework CTMP at Appendix A [APP-415]. Table 18-2, List of relevant national policy, ES, Chapter 18 Traffic and transport [APP-097] references paragraph 4.14.12 of the NPSWRI,

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		signposting section 18.4 where paragraph 4.14.12 is addressed.
4.14.13	Where feasible and operationally practical, demand management measures should be implemented before considering new transport infrastructure. Projects should promote the movement of freight from roads to more sustainable alternatives such as rail, cargo bikes, maritime transport and inland waterways. Infrastructure supporting alternative fuels, including electric vehicle charging, should also be provided where appropriate.	Paragraph 4.4.433 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) details the need for all stages of the development to encourage a modal shift of freight from road to more sustainable alternatives. Paragraph 4.4.435 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) notes that the approach to managing traffic impacts is set out in the Framework CTMP [APP-415] and at paragraph 4.4.436 that the Traffic Management Strategy [APP-416] covers traffic control, public safety and coordination with local authorities.
4.14.14	The needs of freight transport should be considered throughout both construction and operation, including the provision of suitable facilities for Heavy Goods Vehicle (HGV) drivers where required.	Paragraph 4.4.437 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) requires consideration of the needs of freights at all stages of construction and operation of the development.
4.14.15	Where transport options are available, rail and water-borne transport should generally be preferred over road transport, provided they are safe and cost-effective.	Paragraph 4.4.438 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) states that HGV welfare facilities are provided in the site sectional compounds as set out in section 3.3 of the Framework CTMP [APP-415].

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		HGV welfare facilities are provided in site sectional compounds as set out within ES Chapter 3 Description of the Proposed development [APP-082]. Consideration of Heavy Goods Vehicles (HGV) movements have been assessed within ES Chapter 18 Traffic and transport [APP-097].
4.14.16	Where substantial HGV traffic is anticipated, applicants should seek to manage HGV movements and routing, maximise opportunities for more sustainable transport modes, provide infrastructure for alternative-fuel vehicles, ensure adequate HGV parking and driver welfare facilities, and put in place arrangements to address abnormal disruption and the transport of abnormal loads.	Paragraph 4.4.441 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) details requirements in relation to HGV movements. Paragraph 4.4.442 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) states that the Framework CTMP [APP-415] relates to the construction phase of the Project setting out how the traffic impacts will be managed. Table 18-2 of ES Chapter ES Chapter 18 Traffic and transport [APP-097] states that arrangements for HGV traffic are considered within the Transport Assessment appended to the ES at ES Appendix 18.1 Transport Assessment [APP-186 -]. Management measures for construction traffic have been set out and secured through the Framework CTMP [APP-415].

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
4.14.17	The SoS should consider whether transport demand management measures are more cost-effective than delivering new transport infrastructure and should support measures that promote more sustainable transport patterns. Applicants should also have regard to the Department for Transport (DfT) Water Preferred Policy Guidelines for the Movement of Abnormal Indivisible Loads when preparing their proposals.	Paragraph 4.4.448 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) states that new transport infrastructure is not being proposed and therefore this paragraph of the NPS has not been considered any further.
4.14.18	The SoS may attach requirements or require planning obligations as part of any development consent to ensure that agreed transport mitigation measures are implemented. Claims that such measures would affect the economic viability of a project should not, on their own, justify reducing or removing mitigation requirements that are necessary.	Paragraph 4.4.448 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) notes that draft Requirements for the project are set out in Schedule 2 of the draft DCO [APP-023].
Decision making		
4.14.19	As a water resources Nationally Significant Infrastructure Project (NSIP) can have significant effects on transport infrastructure, the SoS should ensure that applicants have sought to mitigate these impacts throughout both construction and operation. This includes measures to improve accessibility and provision for active travel, public transport and shared transport.	Paragraph 4.4.449 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) recognises the possibility of substantial impacts on the surrounding transport infrastructure which the SoS should ensure is mitigated. Paragraph 4.4.450 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) states that ES Chapter 18 Traffic and Transport [APP-097] assess

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		the extent of the Project's transport impact in relation to the construction and operational phases of the Project. Paragraph 4.4.451 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) states that the Framework CTMP [APP-415] relates to the construction phase of the Project setting out how the traffic impacts of construction will be managed. This paragraph also states that the Framework CWTP which is appended to the Framework CTMP (Appendix A) [APP-415], provides measures to encourage construction workers to travel by sustainable modes of transport.
4.14.20	Where proposed mitigation measures do not reduce transport impacts to acceptable levels, the SoS should consider imposing additional requirements to address adverse effects on transport networks arising from the development.	Paragraph 4.4.453 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) states that ES Chapter 18 Traffic and Transport [APP-097] provides details of embedded primary mitigation in section 18.4. This paragraph also confirms that good construction practices are secured in Section 5 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1) [APP-413 - APP414]. Paragraph 4.4.454 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) states that the Framework CTMP [APP-415] at Section 5 provides detail on the routes that would be designed for use by construction vehicles. This paragraph of the PPS

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		also states that the Traffic Management Strategy [APP-416] at Section 2.3 provides detail regarding any road closures and associated traffic management. Additionally, the RoWMP (Appendix B of the Framework CTMP) [APP-415] secures Public Right of Way mitigation measures. Paragraph 4.4.452 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) notes the SoS's ability to consider mitigation requirements should the proposal not include sufficient mitigation measures for adverse impacts on transport networks. Paragraph 4.4.455 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) states that the primary mitigation measures and the tertiary measures secured by a requirement in the DCO are set out in Section 18.9 of ES Chapter 18 Traffic and transport [APP-097]. Paragraph 4.4.457 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) states it is considered there are no adverse impacts on the transport networks arising from the Project once primary and tertiary mitigation has been applied.
4.14.21	Development consent should not be refused solely because transport impacts remain, provided the applicant is willing to enter appropriate planning	Paragraph 4.4.459 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) states this paragraph of the NPS is not engaged as the Applicant is willing

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	obligations to fund new infrastructure, or where requirements can be imposed to mitigate those impacts. In such circumstances, the SoS should give limited weight to any remaining residual effects on the transport network.	to enter into legal agreements where appropriate and justified. All draft requirements for the Project are set out in Schedule 2 of the draft DCO [APP-023]. Paragraph 4.4.458 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) explains the need for applicants to be open to entering planning obligations for funding new infrastructure or requirements imposed to mitigate transport impacts.
4.14.22	The SoS should only refuse development consent on transport or highway grounds where the proposal would create an unacceptable highway safety risk, where residual cumulative impacts on the road network would be severe, or where the applicant has failed to demonstrate how it has considered and secured modal shift to more sustainable forms of transport, minimised and mitigated freight and construction impacts, and provided adequate access by active, public or shared transport.	Paragraph 4.4.460 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) notes the requirements of paragraph 4.14.22 of the NPSWRI. Paragraph 4.4.461 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) notes the ES Appendix 18.1 Transport Assessment [APP-186 - APP-188] does not identify any unacceptable impact on highway safety. This paragraph of the PPS also confirms that ES Chapter 18 Traffic and transport [APP-097] concludes there are no likely significant adverse effects during the construction or operational stages of the Project. Table 18-2 in ES Chapter 18 Traffic and transport [APP-097] references paragraph 4.14.22 of the NPSWRI, signposting section 8.1 of ES Appendix 18.1 Transport assessment [APP-186 - APP-188] does, where paragraph 4.14.22 is addressed. ES

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		Chapter 18 Traffic and transport [APP-097] also confirms in table 18-2, that the assessment of effects in relation to accidents and safety and driver delay is provided in Section 18.8, with no likely significant effects reported.

5.15 Water Quality and Resources

Table 5.15 Water Quality and Resources

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
Introduction		
4.15.1	While water resources infrastructure is important for maintaining a secure and resilient water supply, its construction and operation can adversely affect groundwater, inland waters, transitional waters and coastal waters. Environmental objectives for these water bodies are established through River Basin Management Plans and are legally binding.	Paragraph 4.4.464 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) references paragraph 4.15.1 of the NPSWRI for context with cross reference to the Case for the Project (Document reference 5.6, DCO Volume 5, Version 1). Sections 11.4 and 11.8 of ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1) set out potential groundwater and surface water impacts in relation to land quality and ground conditions alongside mitigation measures proposed throughout the development's lifetime. All other impacts on water resources with the Proposed Development are discussed within ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1).
4.15.2	Infrastructure can cause ecological and hydro morphological impacts, particularly from impounding reservoirs, which may affect human health, protected	Paragraph 4.4.467 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) notes the policy requirement with reference to ES Chapter 19 Water

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	species and habitats. Such impacts could prevent water bodies or protected areas from meeting the objectives of the Water Framework Directive Regulations, whose primary objective is to prevent deterioration in water body status.	environment (Document reference 6.1, DCO Volume 6, Version 1) and ES Appendix 19.2 WER compliance assessment, which forms an appendix to ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 1, Version 1), ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1) assesses impacts of surface and groundwater bodies and protected areas.
4.15.3	The water resources management plan options appraisal process is answerable to Water Framework Directive Assessment, which can inform any project-specific assessment. The process considers wider water availability issues, while project-level assessments focus on impacts to local water bodies.	Paragraph 4.4.470 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) states that the Water Framework Directive Assessment has informed the work undertaken in ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1).
4.15.4	Government planning policy requires development to protect and enhance the natural environment by preventing water pollution and unacceptable environmental risks. Relevant guidance includes Government advice on water supply, wastewater and water quality in the planning system. Water companies are expected to contribute to environmental improvements, while the SoS must also consider duties	Paragraph 4.4.471 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) notes the policy requirement with reference to ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1).

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	under the Environment Act 2021 and policies within the Environmental Improvement Plan.	Sections 11.4 and 11.8 of ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1) set out potential groundwater and surface water impacts in relation to land quality and ground conditions alongside mitigation measures proposed throughout the development's lifetime.
Applicant's assessment		
4.15.5	Applicants should engage early with the local authority, Environment Agency and Marine Management Organisation regarding permitting and licensing requirements. Where significant effects on the water environment are possible, the ES should include an assessment of water quality, water resources and physical characteristics, and may require a project-specific Water Framework Directive Assessment.	Paragraph 4.4.473 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) notes the policy requirement and paragraph 4.4.474 notes that details of engagement with the Environment Agency (EA) and Marine Management Organisation (MMO) are provided within section 3 of the Statement of Engagement [APP-072] and the EA SoCG (Document reference 5.8, DCO Volume 5, Version 2) and MMO SoCG (Document reference 5.8, DCO Volume 5, Version 1).
4.15.6	The ES should assess existing water quality, water resources, flow characteristics and protected water environments, together with potential effect due to climate change and cumulative impacts on water bodies protected under the Water Framework Directive Regulations.	Paragraph 4.4.479 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) references paragraph 4.15.6 of the NPSWRI setting out the contents of an ES. Paragraph 4.15.6 is also referenced in paragraph 4.4.480, table 4-11 of the PPS (Document reference

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		5.5, DCO Volume 5, Version 2), which demonstrates how the NPSWRI and EA requirements have been integrated into ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1). Sections 11.4 and 11.8 of ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1) set out potential groundwater and surface water impacts in relation to land quality and ground conditions alongside mitigation measures proposed throughout the development's lifetime.
4.15.7	Applicants should have regard to relevant groundwater guidance that explains the legal requirements associated with activities affecting groundwater resources.	Paragraph 4.4.481 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) states that the impact of the Project on surface and groundwater is assessed in ES Chapter 19 Water environment (Document reference 6.1, Volume 6, Version 1). ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, Volume 6, Version 1) assesses impacts of surface and groundwater bodies and protected areas. ES Appendix 19.3 Hydrogeological impact assessment [APP-198] and ES Chapter 20 Cumulative and in-combination effects [APP-099].

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
		Section 19.8 of ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) assesses the impact of the development on surface and groundwater.
4.15.8	The transfer of untreated water can spread invasive non-native species between water bodies. This may require treatment. Applicants should assess any resulting risks to water quality, identify potential pathways and set out mitigation measures. Assessments undertaken through the water resources management plan options appraisal process by water companies may assist in identifying these risks.	Paragraph 4.4.482 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) states that ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) considers Invasive and Non Native Species in relation to potential effect on freshwater biodiversity and mitigation measures as set out within section 4 of the Outline Invasive and Non Native Species Biosecurity Plan [APP-425]. Section 19.8 of ES Chapter 19 Water environment (Document reference 6.2, DCO Volume 6, Version 1) assesses the impact of the development on surface and groundwater. ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1), assesses impacts of surface and groundwater bodies and protected areas.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
Mitigation		
4.15.9	Applicants may also need to assess measures to protect the water environment, including provisions for eel protection and improved fish passage.	Paragraph 4.4.484 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) states measures for providing safe passage of fish are included within ES Chapter8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1), and the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1) [APP-413 and APP-414]. Paragraph 4.4.483 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) lists measures to provide safe passage for fish included in terrestrial and freshwater biodiversity and the water environment sections of the ES and the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1) [APP-413 and APP-414]. Section 19.8, of ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1), assesses the impact of the development on surface and groundwater. ES Appendix 19.2 (Document reference 6.1, DCO Volume 6, Version 1), assesses impacts of surface and groundwater bodies and protected areas.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
4.15.10	The SoS should consider whether the mitigation and enhancement measures proposed by the applicant for both construction and operation are acceptable.	Paragraph 4.4.486 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) refers to paragraph 4.15.10 of the NPSWRI, advising the SoS to consider whether the mitigation and enhancement measures are acceptable. Paragraph 4.4.487 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) states ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1), identifies the primary and tertiary mitigation measures specific to the water environment during construction and operation.
4.15.11	Projects should meet applicable national standards for sustainable drainage systems (SuDS), following a hierarchy that promotes the most sustainable drainage solutions while recognising the role of conventional drainage where site constraints require it. This should be considered alongside the policies in Section 4.7 on Flood Risk.	Paragraph 4.4.488 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) states the proposed SuDS Strategy for the Project aligns with the principles within the National Standards for SuDS (Department for Environment, 2025). Section 19.8 of ES Chapter 19 Water Environment (Document reference 6.2, DCO Volume 1, Version 1), assesses the impact of the development on surface and groundwater. ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1) assesses impacts of surface and groundwater bodies and protected areas.

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
4.15.12	Impacts on the water environment should be minimised through careful project design and adherence to recognised pollution control practices.	Paragraph 4.4.489 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) refers to paragraph 4.15.12 of the NPSWRI, acknowledging methods of reducing the risk of impacts on the water environment.
Decision making		
4.15.13	Activities involving discharges to the water environment are regulated through pollution control. The considerations are set out in Section 3.8 on the interface between planning and other regulatory controls which apply.	Paragraph 4.4.490 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) notes that pollution control measures have been incorporated into the primary and tertiary mitigation measures of the Project and at paragraph 4.4.491 that a Construction Drainage Plan will be prepared by the Contractor, once appointed.
4.15.14	The SoS should give greater weight to impacts where a proposal could adversely affect achievement of the environmental objectives, established under the Water Framework Directive Regulations.	Paragraph 4.4.492 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) states that the WER compliance assessment which forms an appendix to ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 1, Version 1), presents an assessment of whether the Project is compliant with the requirements of the water environment (Water Framework Directive) Regulations 2017.
4.15.15	The SoS should be satisfied that proposals have considered relevant River Basin Management Plans and	Paragraph 4.4.477 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) states the impact of

Relevant paragraph reference	Summary of policy requirement	Where addressed in the application submission
	that proposals comply with the objectives of the Water Framework Directive Regulations. Development consent must be refused where a project would cause deterioration in a water body's status, or prevent it achieving good status or good potential, unless conditions apply to the exemption of Overriding Public Interest outlined in Regulation 19. Approval may be granted without the Overriding Public Interest test if there is adequate certainty there will be no deterioration or compromise of the achievement of good status or potential.	the Project on the ecological and chemical status of surface waters, and the quality and quantity of groundwaters under the Water Environment (Water Framework Directive) Regulations 2017, is assessed in ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1). Paragraph 4.4.494 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) states the consideration of the Project on actions set out in the RBMP (River Basin Management Plan), is undertaken in ES Appendix 19.2 WER compliance assessment.
4.15.16	The SoS should consider proposed mitigation and enhancement measures for the water environment and determine whether these should be attached to any Development Consent and/or if planning obligations are required, or other measures that contribute towards achieving statutory environmental targets.	Paragraphs 4.4.497 – 4.4.501 of the PPS (Document reference 5.5, DCO Volume 5, Version 2) address the mitigation measures proposed in relation to the water environment.


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