Hampshire Water Transfer and Water Recycling Project

The Applicant's responses to Relevant Representations from persons with an interest in land

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1 Introduction

1.1 Purpose of this document

1.1.2 This document contains Southern Water Services Limited's (hereafter referred to as 'the Applicant') responses to Relevant Representations (RRs) submitted by persons with an interest in land for the Hampshire Water Transfer and Water Recycling Project (hereafter referred to as 'the Project'). This is one of four documents submitted as part of the Applicant's responses to RRs. An explanation of the methodology used to collect, analyse and process the RRs, as well as a table containing all the RRs received by the Planning Inspectorate, can be found in the Applicant's guide to responses to Relevant Representations (Document reference 8.4, DCO Volume 8, Version 0).

1.2.2 A detailed description of the Project can be found in Environmental Statement (ES) Chapter 3 Description of the Proposed Development [APP-082]. The Application Glossary [APP-007] sets out the abbreviations and definitions used in the DCO application for the Project.

1.2 Structure of this document

2.1.2 The RRs and the Applicant's responses are presented in a tabular format, with one table per RR. Each table includes the RRs reference number, as described in the Planning Inspectorates Library, the theme assigned to that segment of the RR, the comment as submitted by the IP, and the Applicant's response.

2 The Applicant's responses to persons with an interest in land

Table 2-1 The Applicant's response to RR-008, RR-295 and RR-327 from Susan Kelly and Alexander Charkin

Reference	Theme	Issue raised	The Applicant's response
RR-008-1	Greeting	PLANNING INSPECTORATE PLANNING ACT 2008 APPLICATION FOR A DEVELOPMENT CONSENT ORDER HAMPSHIRE WATER TRANSFER AND WATER RECYCLING PROJECT Planning Inspectorate Reference: WA010002 (Applicant's Reference: 23008223) Applicant: Southern Water Services Limited RELEVANT REPRESENTATIONS on behalf of Mr Sean Pearse Kelly and Mrs Susan Kelly ('Mr and Mrs Kelly') (Low Hill Farmhouse, Portsmouth Road, Fishers Pond, Eastleigh SO50 7HF) - Book of Reference: Legal Group 134 and Mr Alexander James Charkin and Mrs Emily Marion Florence Charkin ('Mr and Mrs Charkin') (Redacted) - Book of Reference: Legal Group 146 Interested Parties Submitted by the deadline for Relevant Representations, 23:59 on 24 August 2026	The Applicant notes this comment.
RR-008-2	Landowner engagement	1. INTRODUCTION AND SUMMARY 1.1. This Relevant Representation is submitted under section 102(4) of the Planning Act 2008 and regulation 4 of the Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015 on behalf of Mr Sean Pearse Kelly and Mrs Susan Kelly, the owners and occupiers of (redacted) (Book of Reference: Legal Group 134), and Mr Alexander James Charkin and Mrs Emily Marion Florence Charkin, the owners and occupiers of (redacted) (Book of Reference: Legal Group 146) (together, the Representors). The Representors are affected persons and Interested Parties because the application seeks powers over land and rights in which they have interests, 1.2. The Representors are Interested Parties whose land is directly and significantly affected by the proposed Development Consent Order for the Hampshire Water Transfer and Water Recycling Project (the 'Project'), promoted by Southern Water Services Limited ('Southern Water'). Dalcour Maclaren acts as land agent on behalf of Southern Water in respect of land negotiations.	The Applicant notes this comment.

Reference	Theme	Issue raised	The Applicant's response
RR-008-3	Location of the proposed pipeline routes	1.3. The Representors do not oppose the public purpose of improving regional water resilience or every element of the Project. They oppose: (i) the submitted local alignment at Design Refinement 7 unless its selection is justified by a transparent comparison with reasonable alternatives;	The Pipeline route has been designed using an extensive route selection process as set out in the Scheme Development Report [APP-073 to APP-075]. The Applicant has considered a number of alternatives in this location.
RR-008-4	Landowner engagement	(ii) the acquisition of land, rights and restrictive covenants over Lowhill Farmhouse and Quest Lodge respectively beyond what is shown to be necessary; and	The Applicant confirms that compulsory acquisition powers are sought for rights and the creation of new rights (including imposing restrictive covenants) over plots 22-006 (Mr Alexander James Charkin and Mrs Emily Marion Florence Charkin) and 22-007 (Mr Sean Pearse Kelly and Mrs Susan Kelly) shown edged black and shaded blue on Sheet 22 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2) in connection with Works No.4 as being construction of a pipeline between the Water Recycling Plant and Otterbourne Water Supply Works as shown on Sheet 22 in the Works Plans [APP-014]. The rights and restrictions sought by the Applicant in respect of the land referred to by the respondent can be found within Schedule 5 to the draft DCO [APP-023]. The need for rights and restrictions are set out in '5.4 Permanent Acquisition of Rights and Imposition of Restrictions' in the Statement of Reasons [APP-025]. The Applicant confirms that temporary possession powers are also sought over plots 22-006 and 22-007 as set out within paragraph 5.5.1 of the Statement of Reasons [APP-025]. As set out within the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition have been met and that the rights sought are necessary and proportionate in order to protect and preserve the integrity of the Project. On the restrictive covenants, the purpose of the easement is to protect the integrity and operational requirements of the pipeline and to ensure appropriate access for inspection, maintenance, repair and replacement activities. The required width has been determined following a detailed technical assessment, taking account of the pipeline's diameter, depth, construction methodology, location and operational function. For sections of pipeline installed using open-cut construction, the Applicant is seeking an easement width of 11m (5.5m either side of the pipeline). This reflects the access and operational requirements associated with maintaining and, if necessary, excavating the pipeline in the future. Notably, this represents a reduction from the Applicant's published stand-off guidance for water mains of a comparable size and depth [1], which would typically require a wider protected corridor. For sections constructed using trenchless techniques, a reduced easement width is considered appropriate, taking into account depth, construction methodology and location. As the pipeline is installed at greater depth and future maintenance or operational access would be undertaken from either side of the trenchless section rather than directly above it, the same level of

Reference	Theme	Issue raised	The Applicant's response
			restriction is not required. The easement width has therefore been tailored to reflect the differing operational requirements of the construction methodologies. The Applicant is therefore satisfied that the easement widths proposed represent the minimum reasonably required to protect the pipeline and secure its safe operation over its lifetime. This reduction from the normal requirement has been communicated to the respondent's land agent on 24 July 2026. Article 28 of the draft DCO [APP-023] states that the compulsory acquisition must be exercised within 5 years otherwise they will lapse.
RR-008-5	EIA approach and methodology	(iii) the absence of sufficiently site-specific and enforceable safeguards for their homes, private services, ground conditions and groundwater receptors.	The Applicant notes the concerns regarding the absence of sufficient site-specific and enforceable safeguards for homes, private services and ground conditions and groundwater receptors. The Applicant considers that the level of information submitted with the Application is appropriate for the DCO application stage. The Environmental Statement (ES) has been prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment (EIA)) Regulations 2017 and relevant EIA guidance and assesses the likely significant environmental effects of the Project. The approach to the assessment of likely significant environmental effects is described in ES Chapter 5 EIA approach and methodology [APP-084], including the identification of receptors, assessment of effects and identification and application of mitigation measures. In relation to homes, ES Chapter 12 Land use and agriculture [APP-091] assesses the likely effects of the Project on residential property, land interests, agricultural land holdings and existing land uses. The assessment considers the temporary and permanent land requirements associated with the Project and identifies mitigation measures designed to minimise impacts wherever reasonably practicable. In addition, ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1) provides an assessment of the likely significant effects on socio-economics, tourism and health arising from the construction, operation and decommissioning of the Project. The health assessment considers impacts on neighbourhood amenity, accessibility and active travel, community safety, access to healthcare, social care and other social infrastructure, recreation, access to green space and nature, access to work and training, and social cohesion. In relation to private services, ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) identifies and assesses potential effects on private water supplies, licensed abstractions and other groundwater receptors that could be affected by the Project. Mitigation measures have been identified to protect these receptors through monitoring, risk assessments and control measures, including the implementation of a Water Monitoring Plan

Reference	Theme	Issue raised	The Applicant's response
			secured by the relevant requirement in Schedule 2 to the draft DCO [APP-023]. Where private water supplies are impacted by construction activities, an appropriate alternative supply would be provided in agreement with affected stakeholders. These measures are contained in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) and the Outline Water Monitoring Plan [APP-204], secured by the relevant requirements in Schedule 2 to the draft DCO [APP-023]. The likely significant effects of the Project on ground conditions are assessed within ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1). The chapter identifies embedded mitigation measures, assesses the significance of effects and identifies any additional mitigation required to manage identified risks. Mitigation measures are contained in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3), Operational Environmental Management Plan [APP-422], Outline Water Monitoring Plan [APP-204] and Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1), secured by the relevant requirements in Schedule 2 to the draft DCO [APP-023]. In addition, the likely significant effects of the Project on surface water and groundwater receptors are assessed within ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1). The assessment considers potential impacts on groundwater bodies, groundwater quality and hydrological receptors and identifies mitigation and control measures to avoid or reduce adverse effects. Mitigation measures are contained in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3), Outline Landscape and Ecology Management Plan (Document reference 7.5, DCO Volume 7, Version 1), Operational Environmental Management Plan [APP-422], Outline Water Monitoring Plan [APP-204], Design Principles Document [APP-023] and Works Plans [AS-007 – 1 of 3 documents, AS-008 – 2 of 2 documents and APP-014], secured by the relevant requirements in Schedule 2 to the draft DCO [APP-023] and by Environmental Permits. The Applicant therefore considers that the Application provides an appropriate and enforceable framework of safeguards for homes, private services, ground conditions and groundwater receptors. These safeguards are identified within ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1), ES Chapter 12 Land use and agriculture [APP-091], ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) and contained in the aforementioned documents secured by the relevant requirements in Schedule 2 to the draft DCO [APP-023].
RR-008-6	Location of the proposed pipeline routes	1.4. These representations address the following principal matters:	For all potential design changes, the Applicant undertook a comparative evaluation of alternative designs against a range of engineering, planning and

Reference	Theme	Issue raised	The Applicant's response
		(a) Whether the Applicant has demonstrated, by a transparent and like-for-like assessment, that Design Refinement 7 is preferable to the Spring 2025 alignment or any less intrusive micro-alignment;	environment criteria, set out Table 5-1 of the Scheme Development Report - 1 of 3 documents [APP-073]. The Applicant amended the Pipeline route from the Spring 2025 Consultation design to the alignment in the DCO application as this option was considered to have the least impacts on various environmental receptors, and reduced disruption to existing land uses. This decision was made having regard to all feedback received from landowners. By proposing trenchless construction under land at Low Hill Farm, surface works in the proximity of properties would be avoided, amenity impacts to these properties would be reduced, nearby agricultural and business land uses would be avoided, and impacts on the environment would be reduced.
RR-008-7	EIA approach and methodology	(b) Whether the Environmental Statement and control documents adequately assess and mitigate residential noise, vibration, settlement, access and private-service effects;	The Applicant notes the concerns regarding whether the ES and associated control documents adequately assess and mitigate residential noise, vibration, settlement, access and private service effects. The Applicant considers that the level of information submitted with the Application is appropriate for the DCO application stage. The ES has been prepared in accordance with the Infrastructure Planning (EIA) Regulations 2017 and relevant EIA guidance and assesses the likely significant environmental effects of the Project. ES Chapter 5 EIA approach and methodology [APP-084] explains the assessment framework adopted and confirms that the EIA has been undertaken using a Rochdale Envelope approach, whereby topic assessments are based on maximum design parameters and worst case assumptions to ensure that maximum adverse effects are identified and considered. The likely significant effects of construction and operation on noise and vibration are assessed within ES Chapter 15 Noise and vibration [APP-094]. The assessment identifies sensitive residential receptors in proximity to the Project, including the Quest Lodge and Lowhill Farmhouse residential receptors (R191 and R192 in ES Figure 15.1 Noise and vibration direct effects study areas, sensitive receptors and monitoring locations, Sheet 8 [APP-374]) and considers the potential effects arising from construction activities, operation of the Project and associated traffic movements. The chapter identifies embedded mitigation and any additional mitigation measures required to reduce effects. Mitigation measures are contained in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3), Framework Construction Traffic Management Plan (CTMP) [APP-415], Operational Environmental Management Plan [APP-422] and Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) and Works Plans [AS-007 – 1 of 3 documents, AS-008 – 2 of 3 documents and APP-014 – 3 of 3 documents], secured by the relevant requirements in Schedule 2 to the draft DCO [APP-023]. Further, ES Chapter 15 Noise and vibration [APP-094] assesses the significance of residual effects following implementation of those measures.

Reference	Theme	Issue raised	The Applicant's response
			In relation to private services, ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) assesses potential effects on private water supplies, licensed and unlicensed abstractions, springs and groundwater receptors. Mitigation includes measures to protect these receptors through monitoring, risk assessments and control measures, including implementation of a Water Monitoring Plan. Furthermore, where private water supplies are impacted by construction activities, an appropriate alternative supply would be provided in agreement with affected stakeholders. These mitigation measures are contained in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and in ES Appendix 19.9 Outline Water Monitoring Plan [APP-204] which are secured by relevant requirements in Schedule 2 to the draft DCO [APP-023]. ES Chapter 12 Land use and agriculture [APP-091] assesses the effects of the Project on residential properties, land interests and access arrangements. Temporary and permanent land requirements have been identified and assessed as part of the EIA. Where temporary disruption may occur during construction, measures will be implemented to maintain access, where reasonably practicable, and to minimise disruption to affected residents, contained in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and Framework CTMP [APP-415], secured by relevant requirements in Schedule 2 to the draft DCO [APP-023]. In relation to settlement effects, ES Chapter 11 Land quality and ground conditions [APP-090] assesses risks associated with ground conditions and construction activities. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) includes commitments requiring ground movement assessments, monitoring before, during and after construction and implementation of measures to avoid or minimise impacts on structures, property and buried services. These measures are secured by a requirement in Schedule 2 to the draft DCO [APP-023]. The Applicant therefore considers that residential noise, vibration, settlement, access and private service effects have been appropriately assessed within the ES and that a robust and enforceable framework of mitigation, monitoring and control measures has been established through the management plans secured by relevant requirements of the draft DCO [APP-023].
RR-008-8	Water environment	(c) Whether infilled land, the identified groundwater abstraction borehole and any connected private water supply are adequately assessed and protected;	The Applicant notes the concerns regarding the assessment of infilled land, the identified groundwater abstraction borehole and any connected private water supply. The potential impacts on the quantity and quality of groundwater resources and any connected private water supplies are considered in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1*)* and ES Appendix 19.3 Hydrogeological impact Assessment [APP-198]. The assessment concludes that there will be no likely significant effects on groundwater resources, on the basis of the mitigation measures set out in ES Appendix 19.9 Outline Water Monitoring Plan [APP-204] and the Outline

Reference	Theme	Issue raised	The Applicant's response
			CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). Section 4.3 of ES Appendix 19.9 Outline Water Monitoring Plan [APP-204] states *'Where works are proposed within 100m of a licensed or private water supply, a receptor specific water supply risk assessment will be undertaken prior to construction, which will outline mitigation and monitoring requirements.'*, whilst the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) includes the following measures: • WE1: The Contractor will adhere to the Environment Agency's Approach to Groundwater Protection (2018) framework. • WE2: The Contractor will prepare a Risk Assessment and Method Statement, specific to works within Source Protection Zones in accordance with ES Appendix 19.9 Outline Water Monitoring Plan [APP-204]. • WE3: A Voids Treatment Protocol will be developed by the Contractor to set out how voids encountered during construction within the chalk will be mitigated to avoid pollution or flow impacts on groundwater bodies. • WE7: The design of piled foundations and deep structures will include a Foundation Works Risk Assessment, undertaken in accordance with relevant CL:AIRE published guidance. The Contractor will also undertake a Piling Risk Assessment to develop site-specific measures to manage risks to potable water supplies. • WE9: Wastewater from construction activities (including dewatering) will be treated where necessary prior to release to foul sewer, ground or surface water to achieve compliance with the relevant consents or permits. • WE16: The Contractor will undertake any dewatering operations in compliance with the appropriate abstraction licences and discharge permits, including monitoring and mitigation measures. • WE17: Any trenchless construction works will use a methodology that excludes groundwater, unless agreed with the Environment Agency beforehand. The Applicant therefore considers that potential effects on groundwater and connected private water supplies have been appropriately assessed within the ES and that a proportionate and enforceable framework of mitigation and control measures has been established through the management plans secured through Schedule 2 to the draft DCO [APP-023].
RR-008-9	Landowner engagement	(d) Whether each compulsory-acquisition power, new right and restrictive covenant sought over the Representors' identified plots is necessary and proportionate, and whether unused rights will be released after construction; and	The Applicant notes this comment and refers to the response in RR-008-04. The Applicant has included the minimum amount of land and rights necessary to deliver the Project within the Order Limits whilst retaining an appropriate degree of flexibility pending completion of the detailed design. The compulsory acquisition powers, new rights and restrictive covenants sought over the identified plots have been included only where the Applicant considers them

Reference	Theme	Issue raised	The Applicant's response
			reasonably required for the construction, operation, maintenance or decommissioning of the Project. This approach to flexibility is common for nationally significant infrastructure projects, where the detailed design continues to evolve following the grant of development consent. As set out in the Statement of Reasons [APP-025], the temporary possession powers allow the Applicant to occupy land for construction and ancillary activities (including site preparation works) without acquiring permanent rights where those rights are not required following construction. The use of temporary possession powers therefore assists in minimising the extent of permanent compulsory acquisition. Following construction, any temporary possession rights will automatically cease in accordance with the provisions of the Order and the land will be returned to the landowner, subject to any permanent rights that have been acquired. Where permanent rights or restrictive covenants are acquired, the Applicant may retain those rights even if the extent of their exercise is ultimately less than originally anticipated, in order to ensure the continued operation, maintenance, inspection, repair, replacement and decommissioning of the Project.
RR-008-10	The draft DCO	(e) Whether the draft DCO, Requirements, protective provisions and certified documents secure the necessary site-specific outcomes before works commence.	The Applicant considers that the draft DCO [APP-023], including its Requirements, protective provisions and certified documents, secures an appropriate and robust framework for the delivery of the Project. The Requirements ensure that key details are subject to approval by the relevant planning authority and other appropriate bodies before works commence, whilst the protective provisions provide additional safeguards for affected statutory undertakers and third parties. The Applicant is satisfied that the draft DCO [APP-023] contains appropriate controls and safeguards and that the necessary site-specific outcomes will be secured through the approval and discharge processes required before the relevant works can proceed.
RR-008-11	The draft DCO	(f) The Representors' position under Article 8 of the European Convention on Human Rights and the fair-balance principle, which is reserved pending the final design and the evidence as to the nature, duration, mitigation and residual severity of effects on their homes.	The Applicant notes this comment. For the reasons set out in the Statement of Reasons [APP-025], the Applicant considers that any interference with rights protected by Article 8 of the European Convention on Human Rights is justified, necessary and proportionate and that a fair balance has been struck between private interests and the substantial public benefits of the Project. The Applicant will continue to engage with affected landowners as the Project progresses.
RR-008-12	Location of the proposed pipeline routes	1.5. The Representors invite the Examining Authority to include route selection, residential and groundwater effects, site-specific design safeguards and the necessity and proportionality of the powers sought over their identified plots within the Initial Assessment of Principal Issues. They request the information and DCO safeguards specified in the section below.	The Applicant has noted this comment and refers the respondent to the Applicant's responses at RR-008-3, RR-008-4, RR-008-5, RR-008-6, RR-008-7, RR-008-8, RR-008-9, RR-008-10 RR-008-13, RR-008-16, RR-008-22 and RR-008-48 to RR-008-60.

Reference	Theme	Issue raised	The Applicant's response
RR-008-13	Location of the proposed pipeline routes	2. BACKGROUND AND CHRONOLOGY OF ENGAGEMENT Summer 2024 Consultation 2.1. Southern Water undertook a public consultation on the Project in Summer 2024 (the "Summer 2024 Consultation"). The proposed pipeline route at that stage crossed the Representors' land, including residential garden areas and equestrian paddocks used for grazing. 2.2. The Representors' adviser, (redacted) Wilson Hill, attended a Southern Water consultation event on 20 June 2024. (Redacted) recalls that, at that event, a member of the design team acknowledged the practical difficulty of a route through the residential garden and equestrian paddocks and indicated that alternatives were being considered. That account is a paraphrase of his recollection and is not put forward as a verbatim quotation 2.3. On the basis of this engagement, the Representors and their advisers submitted constructive representations during the Summer 2024 Consultation, proposing practical alternative routes and cooperating fully with Southern Water's design process.	The Applicant had regard to feedback relating to this location of the Pipeline. This triggered amendments to the Pipeline route that were consulted on at the Spring 2025 Consultation when the Pipeline route had been moved further north. Following further feedback at the Spring 2025 Consultation, the Applicant made further refinements to the Pipeline route so that it could further reduce and avoid impacts. This is set out in Section F.10 in Appendix F and G.10 in Appendix G of the Scheme Development Report - 3 of 3 documents [APP-075].
RR-008-14	Location of the proposed pipeline routes	Confirmation of Route Change (January 2025) 2.4. In or around January 2025, Dalcour Maclaren informed the Representors' adviser that the developing alignment had been moved away from the Representors' land. The Spring 2025 consultation then showed an alignment across neighbouring land. The Representors understood from those published proposals that their land was no longer affected at that design stage, while recognising that route design remained capable of refinement before submission of the DCO application.	The Applicant amended the design of the Pipeline route in this location following the Summer 2024 Consultation and this design avoided the Representors' land. This amendment was consulted on at the Spring 2025 Consultation.
RR-008-15	Location of the proposed pipeline routes	Spring 2025 Consultation (March 2025) 2.5. At the Spring 2025 Consultation (March 2025), the amended pipeline route was publicly confirmed. The amended route ran across neighbouring farmland rather than through the Representors' garden and equestrian paddocks, thereby avoiding the Representors' land altogether. 2.6. The Representors took no issue with the amended route and made no further representations at that stage, in the reasonable belief that their concerns had been heard and the matter resolved.	The Applicant amended the design of the Pipeline route in this location following the Summer 2024 Consultation, and this design avoided the Representors' land. This amendment was consulted on at the Spring 2025 Consultation.
RR-008-16	Location of the proposed pipeline routes	Neighbouring Landowner Representations and Route Reversion 2.7. Following the Spring 2025 Consultation, certain neighbouring landowners raised concerns that the amended route would impact their business operations and arable fields. The Representors understand that these concerns related principally to the paddock and business operations of Grayswood Carriages (a carriage riding business operated by a neighbour) and to adjacent arable farmland.	The Applicant amended the Pipeline route from the Spring 2025 Consultation design to the alignment in the DCO application as this option was considered to have the least impacts on various environmental receptors and reduced disruption to existing land uses. This decision was made having regard to all feedback received from landowners. By proposing trenchless construction under land at Low Hill Farm, surface works in the proximity of properties would be avoided, amenity impacts to these properties would be reduced, nearby agricultural and business land uses would be avoided and impacts on the environment would be reduced.

Reference	Theme	Issue raised	The Applicant's response
		2.8. The Representors were not involved in the Applicant's internal comparison of the Spring 2025 and reverted alignments before Design Refinement 7 was published for targeted consultation. They subsequently had the opportunity to respond during the Autumn 2025 targeted consultation. Their present concern is that the submitted application does not provide a sufficiently transparent, like-for-like account of the evidence and assumptions used to balance the route-specific effects.	
RR-008-17	Location of the proposed pipeline routes	Autumn 2025 Targeted Consultation (10 September - 8 October 2025) 2.9. In September 2025, Southern Water announced as part of the Autumn 2025 Targeted Consultation (10 September - 8 October 2025) that it was reverting the pipeline route back across the Representors' land. This was designated as "Design Refinement 7, Low Hill Farm". 2.10. Southern Water's stated justification for the reversion was as follows (italicised as a direct quotation): 'Following the Summer 2024 Consultation, we amended the pipeline route to that shown in the Spring 2025 Consultation to avoid impacting a residential garden and various equestrian paddocks. However, at the Spring 2025 Consultation we received concerns from landowners in this location that construction of the pipeline along this amended route would adversely impact their business operations and arable fields. We are now proposing to revert to the route shown in the Summer 2024 Consultation, but instead use trenchless construction methods to tunnel the pipeline under the residential garden and equestrian paddocks rather than across it...' 2.11. Southern Water further cited hydraulic efficiency and the absence of new environmental impacts as additional justification for the reversion.	The Applicant amended the Pipeline route from the Spring 2025 Consultation design to the alignment in the DCO application as this option was considered to have the least impacts on various environmental receptors, and reduced disruption to existing land uses. This decision was made having regard to all feedback received from landowners. By proposing trenchless construction under land at Low Hill Farm, surface works in the proximity of properties would be avoided, amenity impacts to these properties would be reduced, nearby agricultural and business land uses would be avoided, and impacts on the environment would be reduced.
RR-008-18	Location of the proposed pipeline routes	Meeting of 24 September 2025 2.12. On 24 September 2025, the Representors and their adviser met with representatives of Southern Water and Dalcour Maclaren to discuss the route reversion. 2.13. At that meeting, the Representors were verbally informed that the tunnel would likely be approximately 10 metres deep (later described as being between 10-20 metres) and that the easement would be no wider than the tunnel itself. The Representors participated in the Autumn 2025 targeted consultation through the submissions recorded by the Applicant as Aut001-01 to Aut001-11, and the Applicant published responses to those submissions. The remaining issue is therefore not the absence of an opportunity to respond, but that material questions identified in that exchange remain dependent on post-consent surveys and detailed design, including final depth, interaction with services, settlement, groundwater protection and the extent of permanent restrictions. 2.14. At the meeting on 24 September 2025, the Representors understood that route directness and cost formed part of the discussion. The Applicant's	The Applicant amended the Pipeline route from the Spring 2025 Consultation design to the alignment in the DCO application as this option was considered to have the least impacts on various environmental receptors, and reduced disruption to existing land uses. This decision was made having regard to all feedback received from landowners. By proposing trenchless construction under land at Low Hill Farm, surface works in the proximity of properties would be avoided, amenity impacts to these properties would be reduced, nearby agricultural and business land uses would be avoided, and impacts on the environment would be reduced.

Reference	Theme	Issue raised	The Applicant's response
		published response states that cost was not the primary reason and relies instead on a more direct alignment, fewer bends and hydraulic efficiency. The Representors' preliminary measurement suggests that the Spring 2025 alignment may be approximately 200 metres longer; that figure should be treated as indicative unless and until a scaled drawing and the measurement methodology are verified. The Representors therefore ask that the route-comparison assumptions and evidence be identified transparently, including length, construction method, programme, hydraulic and energy effects, environmental effects and cost range, or alternatively that the Applicant publish its own comparable length and cost data for both alignments.	
RR-008-19	Landowner engagement	Heads of Terms 2.15. The Heads of Terms subsequently issued by Dalcour Maclaren did not reflect the verbal representations made at the 24 September 2025 meeting. Instead, the Heads of Terms proposed: (a) A minimum depth of cover of only 2.5 metres (not the approximately 10 metres verbally represented); (b) An 8-metre-wide easement strip (not an easement "no wider than the tunnel itself" as verbally represented); (c) Restrictive Grantor Covenants (at Section 9 of the Heads of Terms) prohibiting the planting of trees or shrubs and any building works within the easement strip without prior written consent from Southern Water; and (d) An option period of up to 10 years (subsequently indicated as reducible to 7 years). 2.16. The discrepancy between what was verbally represented and what was subsequently proposed in writing is significant and deeply concerning. Had the Representors been given accurate information at the 24 September 2025 meeting, they would have pressed their objections to the route reversion far more forcefully at that stage and during the Targeted Consultation period.	The Applicant has been engaging with the respondent's land agent on the Heads of Terms on the points raised. **Pipeline depth** The Applicant has previously confirmed that the 2.5m depth referenced is a minimum. The Applicant has recently confirmed to the respondent that it can agree a commitment within the voluntary agreement to a depth of at least 8m depth in this location and has amended Heads of Terms to this effect. **Easement strip** The purpose of the easement is to protect the integrity and operational requirements of the pipeline and to ensure appropriate access for inspection, maintenance, repair and replacement activities. The required width has been determined following a detailed technical assessment, taking account of the pipeline's diameter, depth, construction methodology, location and operational function. For sections of pipeline installed using open-cut construction, the Applicant is seeking an easement width of 11m (5.5m either side of the pipeline). This reflects the access and operational requirements associated with maintaining and, if necessary, excavating the pipeline in the future. Notably, this represents a reduction from the Applicant's published stand-off guidance for water mains of a comparable size and depth [1], which would typically require a wider protected corridor. Notwithstanding this, the Applicant is seeking to acquire an 8m wide total easement through the respondent's voluntary agreement thus representing an enhanced position. This justification was issued to the respondent's land agent on 24 July 2026. As the pipeline is installed at greater depth and future maintenance or operational access would be undertaken from either side of the trenchless section rather than directly above it, the same level of restriction is not required. The easement width has therefore been tailored to reflect the differing operational requirements of the construction methodologies.

Reference	Theme	Issue raised	The Applicant's response
			The Applicant is therefore satisfied that the easement widths proposed represent the minimum reasonably required to protect the pipeline and secure its safe operation over its lifetime. The Applicant refers to the restrictive covenant comments below which are relevant to the Applicant's position that the restrictions over such a width are necessary but are not unduly onerous such that the respondent is unable to continue with their existing use of the land. **Restrictive covenants** On the restrictive covenants, it is standard practice for utility companies to ensure their assets are afforded the necessary protections from activities taking place above them. As noted by the responded, the restrictions are not absolute but require consent from the Applicant. This is necessary to ensure the impact of the change of use at ground level does not prejudice the integrity of the pipeline. Notwithstanding this, there are existing trees and shrubs planted over the land which will not be impacted temporarily or permanently by construction and operation of the pipeline and similar additional planting would be unlikely to not be consented by the Applicant. The Applicant is not aware of any existing plans for buildings in the vicinity of the proposed pipeline. The Applicant welcomes sight of such proposals for consideration. **Option period** As acknowledged by the respondent, the option period has been reduced to be aligned with the time limits of the compulsory acquisition powers set out within the Part 5 Article 28 of the draft DCO [APP-023]. This point is addressed below in RR-008-45. The Applicant hopes that the clarifications provided recently will enable the parties to progress towards a voluntary agreement. Additionally, the Applicant recently attended a site meeting with the respondent and their representative on the 13 November 2026, to discuss these points further.
RR-008-20	Location of the proposed pipeline routes	3. THE ROUTE CHANGE AND THE REPRESENTORS' CONSTRUCTIVE ENGAGEMENT 3.1. It is important that the Examining Authority appreciate the sequence of events. The Representors engaged constructively and in good faith with Southern Water's consultation process from the Summer 2024 Consultation onwards. They proposed practical alternative routes and cooperated fully with the design process. 3.2. That constructive engagement bore fruit: Southern Water agreed that routing the pipeline through the Representors' garden and paddocks was impractical, and in January 2025 confirmed that the route would be moved. The amended route was publicly confirmed at the Spring 2025 Consultation. 3.3. The amended route redirected the pipeline onto neighbouring farmland and an equestrian paddock associated with the Grayswood Carriages	For all potential design changes, the Applicant undertook a comparative evaluation of alternative designs against a range of engineering, planning and environment criteria, set out Table 5-1 of the Scheme Development Report - 1 of 3 documents [APP-073]. The Applicant amended the Pipeline route from the Spring 2025 Consultation design to the alignment in the DCO application as this option was considered to have the least impacts on various environmental receptors, and reduced disruption to existing land uses. This decision was made having regard to all feedback received from landowners. By proposing trenchless construction under land at Low Hill Farm, surface works in the proximity of properties would be avoided, amenity impacts to these properties would be reduced, nearby agricultural and business land uses would be avoided, and impacts on the environment would be reduced.

Reference	Theme	Issue raised	The Applicant's response
		business. The Representors do not ask the Examining Authority to prefer one landowner's unsupported account over another's. They ask the Applicant to demonstrate the selection of Design Refinement 7 by a transparent, like-for-like comparison of the Spring 2025 and submitted alignments using common assumptions and objective evidence, identifying the construction, residential, business, agricultural, environmental, engineering, cost and mitigation consequences of each route.	Further information is provided at sections F.10.9 and G.10.3 of the Scheme Development Report – 3 of 3 documents [APP-075] which report on the scheme development undertaken at this location following the Summer 2024 Consultation and Spring 2025 Consultation respectively. Please also see RR-008-22.
RR-008-21	Location of the proposed pipeline routes	4. UNRESOLVED EVIDENCE FOLLOWING ENGAGEMENT 4.1. The route was refined between consultation stages and Design Refinement 7 was published for targeted consultation in Autumn 2025. The Representors made the submissions recorded as Aut001-01 to Aut001-11 and the Applicant published responses to them. 4.2. The relevant examination issue is therefore whether the final application resolves, or secures a process to resolve, the site-specific matters identified through that engagement. 4.3. Those matters include route-comparison evidence, final depth and alignment, private services, settlement, infilled land, groundwater and borehole protection, construction effects and the extent of permanent rights and restrictions. 4.4. The Representors ask that those evidential and mitigation issues, rather than the adequacy of the former consultation process as an end in itself, be examined.	The Applicant has noted this comment. See responses to RR-008-20, RR-008-22 and RR-008-23.
RR-008-22	Location of the proposed pipeline routes	5. ADEQUACY OF THE EVIDENCE SUPPORTING DESIGN REFINEMENT 7 5.1. Southern Water's stated justification for the route reversion is that the amended route would adversely impact the neighbouring landowners business operations and arable fields. The Representors challenge the adequacy of the evidence supporting Design Refinement 7, rather than the legitimacy of considering effects on neighbouring land. NPS WRI requires compliance with the legal and policy duties concerning reasonable alternatives and good design. 5.2. The Applicant should identify, for the Spring 2025 and submitted alignments on a like-for-like basis: route and tunnel length; bends and hydraulic and energy implications; construction method and duration; shafts, compounds and access; proximity to residential receptors; business and agricultural effects; trees and hedges; infilled or contaminated ground; groundwater and borehole pathways; utilities; air quality, noise and vibration; carbon; cost range; and mitigation. The application should then explain where each factor is assessed and how the final balance was reached.	The Applicant has had regard to the requirement to assess alternatives, as set out in the NPSWRI. The National Policy Statement refers to the EIA Regulations, which requires applicants to describe alternatives, and an indication of the main reasons for the chosen option, taking into account the effects of the development on the environment. In this particular location the Applicant considered that the trenchless option forming part of the DCO application reduces effects on the environment and local community for the following reasons: • A dense line of woodland at Store House Gully screens the DCO application design from the South Downs National Park and scheduled monuments at Marwell Manor, reducing the potential for impacts on these features which are afforded a very high level of protection in national planning policy. The Spring 2025 Consultation would not have the benefit of this screening and therefore would have greater potential for impact. • The DCO application design does not cross the dense line of woodland and the Store House Gully watercourse. The Spring 2025 Consultation design does cross these features, presenting the potential for impacts to these features during the construction phase.

Reference	Theme	Issue raised	The Applicant's response
			• The DCO application design proposes construction compounds that are set back from residential properties at Low Hill Farm, therefore reducing potential amenity impacts. • The DCO application design would utilise trenchless construction, avoiding surface works within the residential garden and equestrian paddocks. At the same time this design and would avoid the business and agricultural land uses impacted by the Spring 2025 Consultation design.
RR-008-23	Landowner engagement	The Grayswood Carriages Paddock 5.3. The "business operations" referred to in Southern Water's justification are understood to relate to the Grayswood Carriages business, which uses a paddock in the vicinity of the amended route. The Representors' advisers have repeatedly sought clarification from Southern Water and Dalcour Maclaren as to the nature and extent of the alleged business impact. No satisfactory answer has been provided. 5.4. From the Representors' direct knowledge of the neighbouring land, as local residents, the paddock in question is understood to be used principally for grazing rather than for active business operations such as carriage driving, exercising or training. The Representors invite the Applicant to identify the evidence on which the asserted business impact is based. 5.5. On that understanding, the impact on the Grayswood Carriages business of a pipeline crossing the paddock would be limited and temporary, being confined to the construction period, particularly given that the amended route envisaged open-cut trenching which, once reinstated, would leave the paddock fully usable for grazing.	The Applicant issued a note to the respondent's land agent on 17th September 2026 which set out the background of potential routes illustrated during the Summer 2024 Consultation and Spring 2025 Consultation, summarised as follows. **Summer 2024 Consultation** The Summer 2024 Consultation included an open-cut construction route through land at Low Hill Farm. A route to the south of Low Hill Farm had been discounted as it was constrained by existing farm buildings, overhead power lines and ancient woodland at Park Hills Wood. A route to the north was considered sub-optimal as it would intersect with dense vegetation and a watercourse upstream of the Bow Lake watercourse. The respondent provided feedback to the consultation raising concerns to the open cut construction methodology, proposing moving the pipeline north of the belt of trees or south to follow the existing overhead pylons. **Spring 2025 Consultation** The Applicant had already discounted the southern route following the existing pylons but revised the design to a northern route in light of the feedback received to the Summer 2024 Consultation. This route was preferred to open cutting through Low Hill Farm and Quest Lodge when considering noise and vibration as the construction works would be located further from the respondent's residential properties. This route moved the pipeline closer to the South Downs National Park and the scheduled monument and listed buildings associated with Marwell Manor to the north, both offered very high level of protection by national planning policy. Additionally, it would interface with a watercourse not impacted by the Summer 2024 Consultation route. However, it was considered that avoiding surface works through Low Hill Farm and Quest Lodge should be avoided. Feedback received during the Spring 2025 Consultation was that the design would significantly impact two fields used by a carriage driving business, potentially resulting in the temporary closure of the business. The access track to Low Hill Farm and Quest Lodge would also be crossed using open cut methodology with plant and machinery needing to cross it during construction. This would temporarily restrict access between the properties and Portsmouth Road. **Decision**

Reference	Theme	Issue raised	The Applicant's response
			The southern options – comprising the Summer 2024 Consultation design and the Autumn 2025 Consultation design (which forms the basis of the current DCO alignment) are considered to perform broadly equally from an engineering perspective where trenchless construction is proposed. The northern option (referred to in the note as the Alternative Design at Low Hill Farm presented during the Spring 2025 Consultation) is not considered to perform as favourably as either of those options. A trenchless solution beneath land at Low Hill Farm and Quest Lodge would reduce the potential noise, vibration and amenity impacts of open cut construction to the respondent's properties. In addition, it would avoid impacts on features with high levels of protection under national planning policy. The above demonstrates that the key considerations for the route optioneering in this location was impact on features with high levels of protection under national planning policy as well as greater impacts on the respondent's properties than the trenchless construction methodology, rather than perceived business impacts on land to the north. The DCO application design offers the benefit of reducing potential impacts on Grayswood Carriages and avoiding surface works within the residential garden and equestrian paddocks at Low Hill Farm.
RR-008-24	Location of the proposed pipeline routes	The Arable Farmland 5.6. The arable farmland affected by the amended route is a relatively small parcel which the Representors' advisers have observed frequently has no crop grown on it, which may reflect the size and shape of the field and its inclusion within a stewardship or similar option rather than any inherent difference in land quality. 5.7. It is wholly disproportionate to treat the temporary disruption of a small area of arable land as a justification for reverting a pipeline route onto residential land, through gardens and high-value amenity areas, in close proximity to two dwellings. 5.8. Moreover, the Project as a whole crosses tens of miles of arable farmland. Southern Water has not treated other arable landowners as requiring the same degree of protection from temporary construction disturbance. The Representors are unable to identify any principled basis on which this particular parcel of farmland should be afforded greater protection than the Representors' residential gardens and amenity land.	The Applicant has noted this comment. The DCO application design offers the benefit of reducing potential impacts on agricultural land uses and avoiding surface works within the residential garden and equestrian paddocks at Low Hill Farm.
RR-008-25	Project finance and cost	Cost Saving as the True Reason 5.9. The Representors understood from the 24 September 2025 meeting that route directness, and the cost associated with it, formed part of the reasoning for the route reversion. The Applicant's published response states that cost was not the primary reason. In either case:	The Applicant amended the Pipeline route from the Spring 2025 Consultation design to the alignment in the DCO application as this option was considered to have the least impacts on various environmental receptors, and reduced disruption to existing land uses. This decision was made having regard to all feedback received from landowners. By proposing trenchless construction under land at Low Hill Farm, surface works in the proximity of properties would be avoided, amenity impacts to these properties would be reduced, nearby

Reference	Theme	Issue raised	The Applicant's response
		(a) No costings or financial modelling have been provided by Southern Water to substantiate this claimed cost saving; (b) The difference in route length is indicatively measured by the Representors' advisers at approximately 200 metres, subject to verification of the attached scaled drawing and measurement methodology, which would be a marginal difference in the context of a nationally significant infrastructure project spanning many kilometres; and (c) Cost saving to the promoter cannot justify disproportionate harm to affected landowners unless properly evidenced and weighed in the balance. 5.10. The Examining Authority is respectfully invited to require Southern Water to provide the cost range and comparative assumptions relied upon for each alignment, and to explain how the saving associated with the additional tunnel length was weighed against the greater effects on the Representors' residential properties.	agricultural and business land uses would be avoided, and impacts on the environment would be reduced as referenced in Appendix G of the Scheme Development Report - 3 of 3 documents [APP-075]. The Applicant did not make this decision solely on cost, distance or deliverability grounds. Instead, the amendment was decided considering various matters cumulatively. As well offering some deliverability benefits the proposed design presented fewer environmental impacts and reduced impacts on nearby land uses as described above.
RR-008-26	Landowner engagement	6. DISPROPORTIONATE IMPACT ON THE REPRESENTORS' LAND 6.1. Quest Lodge and Lowhill Farmhouse are residential receptors. The proposed centre line is thought to be approximately 15 metres from Quest Lodge. The route and Order Limits interact with (the driveway, garden and equestrian land and private services serving the properties. Quest Lodge is a substantial residential property of value.	The Applicant acknowledges the use of the respondent's property and the proximity referred to. As shown in Appendix A: Reduced Working Width and Trenchless Crossing and Tunnelling Plans, appended to the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), the pipeline will be constructed using trenchless methodology through the entirety of the respondent's land meaning the driveway, garden and equestrian land will not be impacted temporarily during construction works. The trenchless methodology will also ensure the pipeline is constructed beneath existing private services, which will be located at a shallower depth than the project's minimum 2.5m depth commitment. As stated in RR-008-19, the Applicant is prepared to give the respondent a contractual commitment to a minimum depth of 8m in this location which has been communicated to them.
RR-008-27	Landowner engagement	6.2. The impact of the reverted route on the Representors' land includes: (a) Sterilisation of development potential: The 8-metre easement and associated restrictive covenants (prohibiting tree/shrub planting and building works without Southern Water's consent) will sterilise a significant area of the Representors' most valuable land, preventing extensions to dwellings, construction of ancillary residential buildings (e.g. pool house, tennis court, garage), and landscaping within the easement strip;	The Applicant considers that the minimum depth of the pipeline and its location over 15m away from the existing house make it unlikely that it will impact on any plans to extend. There are existing trees and shrubs planted over the land which will not be impacted temporarily or permanently by construction and operation of the pipeline. The Applicant is not aware of any existing plans to erect ancillary residential buildings in the vicinity of the pipeline. The Applicant welcomes sight of such proposals for consideration. It remains the Applicant's firm preference to reach a voluntary agreement for the acquisition of land and rights where possible. As detailed within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken extensive attempts to meaningfully engage with landowners on voluntary agreements and is continuing to engage with the respondent's land agent regarding their feedback and comments on the Heads of Terms. The Applicant recently

Reference	Theme	Issue raised	The Applicant's response
			attended a site meeting with the respondent and their representative on the 13 November 2026, to discuss these points further.
RR-008-28	Location of the proposed pipeline routes	(b) Proximity to dwellings: The reverted route passes in much closer proximity to the Representors' homes than the original trenched route shown in the Summer 2024 Consultation. The switch to tunnelling has brought the alignment closer to the properties rather than further away;	The Applicant has noted this comment. The use of trenchless construction would significantly reduce the potential impacts to these residential properties, as no works would be undertaken at surface level.
RR-008-29	Construction impacts and effects	(c) Impact on services: The reverted route passes close to or through Mr and Mrs Charkin's septic tank and water supply, and through the drainage and water supply systems serving both properties;	The Pipeline in this location is proposed to be installed using a trenchless construction technique beneath the garden of the residential property. The detailed design and construction methodology for this trenchless section will be developed to take account of existing infrastructure and ground conditions. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) states under LQGC 15 that the Contractor will ensure that tunnelling and trenchless construction activities are undertaken so that impacts to surrounding structures, property or buried services are reduced, where practicable. This specifically relates to the post-consent detailed design used to inform the Contractor's Safe System of Work and to establish the potential construction-induced ground movements affecting receptors within the predicted Zone of Influence (ZoI) and will implement good practice measures (including monitoring before, during and after the works) to avoid or reduce any impact of settlement and sub-surface movement during construction. Ground movement monitoring during construction will be compared against the design predictions, with trigger levels and associated actions defined within the detailed CEMP(s) and in accordance with the Contractor's method statements and specifications. Furthermore, MAD1 in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) highlights the preventative measures with respect to utility collisions where the *Contractor will refresh data on the locations of utilities at reasonable appropriate points during the design and construction of the Project to provide relevant information to plan, manage, monitor and co-ordinate health and safety in the construction phase. The risk of damage to utilities will be managed through the Contractor's Permit to Dig which will include details for avoidance of utilities and an emergency response which will be employed should a utility be damaged.*"
RR-008-30	Construction impacts and effects	(d) Construction impact: Tunnelling works in close proximity to residential properties (including noise, vibration, vehicle movements, and compound areas) will cause significant disruption to the Representors' residential amenity during the construction period; and	Impacts from noise, vibration, vehicle movements and construction compound areas and their respective effects on residential properties are assessed within the ES across the relevant chapters: • ES Chapter 12 Land use and agriculture [APP-091] – residential amenity considers the in-combination effects from construction, operation and decommissioning of the Project on residential amenity taking into account the findings of other relevant environmental assessments, including air quality, noise, landscape and visual, and traffic and transport. The assessment concluded that it is not anticipated that the construction in this

Reference	Theme	Issue raised	The Applicant's response
			area would result in any significant in-combination effects on amenity for residential receptors, with at most a minor adverse effect. • ES Chapter 15 Noise and vibration [APP-094] – noise and vibration on human noise and vibration sensitive receptors (NVSRs) considers the in-combination effects from construction, operation and decommissioning of the Project on residential amenity taking into account the findings of other relevant environmental assessments, including air quality, noise, landscape and visual, and traffic and transport. The assessment concluded it is not anticipated that the construction of the Pipeline in this area would result in any significant in-combination effects on amenity for residential receptors, with at most a minor adverse effect. • ES Chapter 17 Socio-economics tourism and health (Document reference 6.1, DCO Volume 6, Version 1) – neighbourhood amenity considers the impact on neighbourhood amenity, defined in ES Chapter 17 as "*a combination of factors that have the potential to affect residents' feelings about, and experience of, their local environment*", from the construction, operation and decommissioning of the Project, taking into account the findings of other relevant environmental assessments, including air quality, noise, lighting, landscape, water quality and ground conditions. The assessment concluded it is not anticipated that the construction of the Pipeline in this area would result in neighbourhood amenity effects. • ES Chapter 18 Traffic and transport [APP-097] – the chapter does not assess the effects from constructing the Project on individual residents but rather assesses delays caused to all road users, severance to community members moving around their community and accessing services and facilities, fear and intimidation from the anticipated volume of traffic, accident and safety, and movement of hazardous and abnormal indivisible loads. As noted above, the findings from this assessment are used to inform the residential amenity assessment in ES Chapter 12 Land use and agriculture [APP-091]. Appropriate mitigation measures that seek to avoid, reduce and mitigate the effects on residents and neighbourhood amenity, and noise and vibration are included in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). Measures that relate to the control of construction traffic are included in the Framework Construction Traffic Management Plan [APP-415] and the Traffic Management Strategy [APP-416].
RR-008-31	Landowner engagement	(e) Blight and diminution in value: The presence of the pipeline, the easement, and the restrictive covenants will adversely affect the value and saleability of both properties.	Whilst the Applicant does not share the view that the presence of the pipeline in the proposed location will significantly affect the value of the respondent's property, in the absence of reaching a voluntary agreement they may be entitled to make a claim for compensation under the compensation code. Nonetheless, the Applicant remains hopeful that a voluntary agreement can be reached with the respondent. The Applicant recently attended a site meeting

Reference	Theme	Issue raised	The Applicant's response
			with the respondent and their representative on the 13 November 2026, to discuss these points further.
RR-008-32	Location of the proposed pipeline routes	6.3. The residential issues requiring examination are: (a) the final three-dimensional alignment, depth and relationship to each dwelling, driveway, structure and private service;	The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) sets out that the minimum depth of the Pipeline would be 2.5m below surface level, however it is expected that the pipeline would be deeper than this. The final design of the Pipeline will be determined at the detailed design stage, and will be informed by further investigations and surveys which will consider the presence of existing utilities and below ground assets.
RR-008-33	Construction impacts and effects	(b) the location, size and duration of any shaft, compound, generator, ventilation, spoil and slurry handling, access and HGV activity serving the trenchless drive;	Information regarding trenchless construction can be found within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). Specifically, the Contractor will ensure that tunnelling and trenchless construction activities are undertaken so that impacts to surrounding structures, property or buried services are reduced, where practicable, as outlined in measure LQGC15 of the document. Further information on trenchless crossings including indicative depths of shafts can be found within the "approach to construction" section of ES Chapter 3 Description of the Proposed Development [APP-082]. Specific details of the shafts and the construction process for the shafts will be developed as part of detailed design.
RR-008-34	Noise and vibration	(c) predicted airborne and ground-borne noise, vibration and settlement at each identified receptor, including duration, working hours and exceptional working;	The construction and operational phase noise and vibration impacts of the project have been assessed, as reported in ES Chapter 15 Noise and vibration [APP-094]. With reference to the construction noise and vibration assessment, as set out in ES Appendix 15.1 Construction noise and vibration assessment [APP-179], these dwellings (R191 and R192) will be mainly affected by construction noise associated with the short-term works (<4-weeks), associated with the pipeline and shaft construction stages. As a minimum all construction noise impacts/effects would be mitigated through the implementation of Best Practicable Means (BPM) with additional noise and vibration mitigation measures where required. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) provides potential mitigation options; the final package of noise mitigation will be identified in a Noise and Vibration Management Plan to be submitted to the relevant local planning authority for approval prior to commencement of construction. Residential receptor IDs R191 and R192 are not close enough to the construction-related vibration generating activities to result in an adverse impact/effect to people or properties. R191 and R192 are at least 18m and 140m from trenchless and shaft construction areas respectively. As such, with reference to Table 15-28 of ES Chapter 15 Noise and vibration [APP-094], the trenchless construction works have the potential to result in minor human annoyance impacts only, which would be temporary, short-term and minor adverse, which are not significant. The works would be further away than the identified distance threshold for the onset of minor building damage impacts; hence, these effects would not be significant.

Reference	Theme	Issue raised	The Applicant's response
			Consequently, no significant construction noise and/or vibration impacts/effects would result at these dwellings. R191 and R192 are located more than 1km from any source of operational noise (i.e. the WRP, BPT and IPSs). At this distance operational noise rating levels would be less than 35dB $L_{Ar,Tr}$ which, with reference to paragraph 15.5.60 of ES Chapter 15 Noise and vibration [APP-094], is below the Lowest Observed Adverse Effect Level (LOAEL), i.e. these dwellings will not experience operational noise effects from the Project. ES Appendix 11.2 Geotechnical and geo-environmental reports (Document reference 6.2, DCO Volume 6, Version 1 – for document 9 of 18 documents) provides the Ground Investigation findings for Section L of the Project, where the stakeholder properties are located. As noted in section 8.2 "*bearing resistance or settlement issues are not expected due to a net reduction in ground bearing pressure at formation level, and hence bearing resistance and settlement issues are not anticipated*". In addition, as set out in measure LQGC 15 in Table 5-1 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) "*The Contractor will establish the potential construction-induced ground movements affecting receptors within the predicted ZoI and will implement good practice measures (including monitoring before, during and after the works) to avoid or reduce any impact of settlement and sub-surface movement during construction*." The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) sets out that the standard working hours for construction of the Project would be: • Monday to Friday (excluding bank holidays): 07:00 to 19:00 in summer (April-September) and 07:00 to 17:30 in winter (October-March). • Saturday: 07:00 to 17:00. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) sets out that where works are required outside of the standard working hours, the relevant local planning authority shall be notified in advance of any proposed works, whilst the Contractor's community relations personnel shall notify affected communities and other relevant stakeholders prior to the commencement of potentially disruptive construction activities. Where constriction activity is planned to take outside the standard working hours, such as for trenchless crossings and tunnelling, the assessment of noise impacts has taken this into consideration, through applying lower thresholds at which adverse impacts occur.
RR-008-35	Landowner engagement	(d) the effect of permanent rights and restrictions on ordinary residential use, landscaping, services and reasonable works, having regard to pipeline depth and demonstrated operational need; and	The Applicant has responded regarding the permanent rights sought, the restrictions imposed by the Project and the pipeline depth in RR-008-19. The Applicant has included the minimum amount of land and rights necessary to deliver the Project within the Order Limits whilst retaining an appropriate degree of flexibility pending completion of the detailed design. The compulsory acquisition powers, new rights and restrictive covenants sought over the

Reference	Theme	Issue raised	The Applicant's response
			identified plots have been included only where the Applicant considers them reasonably required for the construction, operation, maintenance or decommissioning of the Project. This approach to flexibility is common for nationally significant infrastructure projects, where the detailed design continues to evolve following the grant of development consent. As set out in the Statement of Reasons [APP-025], the temporary possession powers allow the Applicant to occupy land for construction and ancillary activities (including site preparation works) without acquiring permanent rights where those rights are not required following construction. The use of temporary possession powers therefore assists in minimising the extent of permanent compulsory acquisition. The Applicant considers that the relevant tests for compulsory acquisition set out in s122 of the Planning Act 2008 have been met. Further detail on the need for the rights and restrictions sought for the Project can be found in sections 5 and 6 of the Statement of Reasons [APP-025].
RR-008-36	EIA approach and methodology	(e) whether pre-construction surveys, monitoring, trigger and stop-work levels, security, emergency response, remediation and post-construction monitoring are enforceably secured.	The Applicant notes the request for construction-related surveys, monitoring and trigger-levels, security, emergency responses, remediation and post-construction to be enforceably secured and considered during the Examination. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) is secured by through Schedule 2 to the draft DCO [APP-023] and includes provision for the following: • Pre-construction surveys – measures TFB5, TFB14, TFB27, TFB35, LVI2, MAD3, WE4 as detailed in Table 5-1 • Monitoring and trigger levels - section 3.3 • Security – section 4.6 • Emergency responses – section 4.5, and measures MA01 to MA04, as detailed in Table 5-1 • Remediation - measure LQGC10 as detailed in Table 5-1 As set out in the draft DCO [APP-023], the Contractor will be required to prepare detailed CEMP(s) in accordance with the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3), thereby ensuring the measures are delivered.
RR-008-37	Landowner engagement	6.4. By contrast, the impact on the neighbouring landowners from the amended route is understood to have been confined to: (a) Temporary disruption to a paddock that is used for grazing; and	The Applicant has responded to this point above in RR-008-23.

Reference	Theme	Issue raised	The Applicant's response
		(b) Temporary disruption to a small area of arable land that frequently lies fallow.	
RR-008-38	Location of the proposed pipeline routes	6.5. The submitted route transfers and changes effects between receptors. The Representors ask the Examining Authority to test whether the Applicant has compared those effects using consistent evidence and whether the selected route and mitigation minimise adverse impacts so far as reasonably practicable. No conclusion is invited on neighbouring land use in the absence of objective evidence from the Applicant and the affected parties.	The Applicant has noted this comment. The Pipeline route has been designed using an extensive route selection process as set out in the Scheme Development Report [APP-073 to APP-075]. For all potential design changes, the Applicant undertook a comparative evaluation of alternative designs against a range of engineering, planning and environment criteria, set out Table 5-1 of the Scheme Development Report - 1 of 3 documents [APP-073]. The Applicant amended the Pipeline route from the Spring 2025 Consultation design to the alignment in the DCO application as this option was considered to have the least impacts on various environmental receptors, and reduced disruption to existing land uses. This decision was made having regard to all feedback received from landowners. By proposing trenchless construction under land at Low Hill Farm, surface works in the proximity of properties would be avoided, amenity impacts to these properties would be reduced, nearby agricultural and business land uses would be avoided, and impacts on the environment would be reduced.
RR-008-39	Legislation, policy and permits	6.6. The adopted Winchester District Local Plan 2020-2040 provides relevant local context. Policy D7 addresses noise, groundwater and surface-water pollution, contaminated land and construction effects; policy NE6 addresses flood risk and the water environment; policy NE17 addresses rivers, watercourses and groundwater; and policy SP3 applies to development in the countryside. The Representors ask the Applicant and the local authority to identify how the submitted alignment and the secured mitigation accord with those policies, the NPS remaining the primary decision-making policy under section 104 of the Planning Act 2008.	The Applicant acknowledges the recognition in the representation regarding the primacy of the NPSWRI in decision making. As set out in the Planning Policy Statement (Document reference 5.5, DCO Volume 5, Version 2) local development plan policy may also be a relevant consideration under Section 104(2)(d). Appendix D of the Planning Policy Statement provides an assessment of development plan policies considered throughout the DCO application. This is not presented as an exhaustive list but includes those policies the Applicant considered to be most potentially relevant. This includes policies D7, NE6 and SP3 quoted in the representation (see pages 331 – 345). Policy NE17 Rivers, Watercourses and their Settings deals with the impact of development on water quality, flood management, biodiversity and groundwater and surface water pollution which are all covered by NPSWRI policy. The Applicant agrees, however, on reflection that the policy provides some useful locally specific context and is relevant. In particular the policy requires development that affects rivers to conserve and enhance water quality and quantity with specific reference to the River Itchen SAC. The operation of the Project would reduce the requirement for water abstraction from the River Itchen SAC which would help to maintain natural watercourse flow and contribute to the conservation objective of maintaining or restoring the structure and function of habitats and species. In EIA terms this represents a long term major beneficial effect. More broadly, water environment effects have been assessed in ES Chapter 19 (Document reference 6.1, DCO Volume 6, Version 1) and managed through embedded design measures, including route selection and trenchless crossings where appropriate. The assessment concludes that, following

Reference	Theme	Issue raised	The Applicant's response
			mitigation, there would be no significant effects on surface water or groundwater resources.
RR-008-40	Archaeology and cultural heritage	6.7. Low Hill Farmhouse is the Grade II listed building recorded as NHLE 1302822. The Applicant should assess the effects of the underground alignment, any surface works, construction vibration and protective works on the building's significance and setting, and demonstrate compliance with section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the historic-environment provisions of NPS WRI and Winchester Local Plan policies HE1, HE3 and HE8.	Low Hill Farm House (NHLE 1302822) is assessed at paragraph 7.8.67 of ES Chapter 7 Archaeology and cultural heritage [APP-086] as being subject to a low adverse magnitude of harm during the construction period as a result of the perceptibility of construction works associated with trenchless construction. In carrying out this assessment and identifying a magnitude of harm, the assessment provided in ES Chapter 7 Archaeology and cultural heritage [APP-086] complies with Winchester Local Plan Policies HE1 and HE8. This effect has been considered in the balance in the Planning Policy Statement (Document reference 5.5, DCO Volume 5, Version 2) in line with Winchester Local Plan Policy HE3, as well as Section 3(1) of the Infrastructure Planning (Decisions) Regulations 2010 which form the statutory basis for weighting harm to listed buildings in the planning balance in DCO planning rather than Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990. No physical effects on the listed building would arise. Table 15-28 of ES Chapter 15 Noise and vibration [APP-094] sets out the maximum distance at which minor structural damage would occur as a result of vibration as 1.4m from the trenchless works and 15m from any vibratory piling works. Low Hill Farmhouse is approximately 50m from trenchless works and 175m from the trenchless shaft construction area where piling may occur.
RR-008-41	The draft DCO	7. COMPULSORY ACQUISITION: NECESSITY, PROPORTIONALITY AND LIMITATION OF RIGHTS Statutory Tests for Compulsory Acquisition 7.1. Under section 122 of the Planning Act 2008, compulsory acquisition may be authorised only where the land is required for the development, is required to facilitate or is incidental to it, or is replacement land, and there is a compelling case in the public interest. Section 123 imposes conditions on the inclusion of such powers. Government guidance requires the Applicant to show a clear need, a reasonable prospect of implementation, that alternatives have been explored, that no more land or rights are sought than are reasonably necessary, and that public benefit outweighs private loss. The Representors object to the powers sought over plots Low Hill Farmhouse and Quest Lodge for the reasons below.	The Applicant notes the Representors' summary of the statutory and policy tests applicable to compulsory acquisition powers. The Applicant agrees that the Secretary of State must be satisfied that the requirements of sections 122 and 123 of the Planning Act 2008 are met, and that the tests set out in the relevant compulsory acquisition guidance have been satisfied. The Applicant considers that those requirements are met in this case. As set out in the Statement of Reasons [APP-025], the land and rights sought are required for, facilitate, or are incidental to the construction, operation, maintenance and protection of the authorised development. The Applicant has also considered alternatives to the Project and to compulsory acquisition, refined the Order Land throughout the design process, and sought to minimise interference with private interests by acquiring rights rather than freehold interests wherever practicable. The Statement of Reasons [APP-025] and the Case for the Project [APP-057] further explain the compelling case in the public interest for the powers sought, having regard to the significant benefits of the Project, including improved water supply resilience. These documents conclude that, on balance, the significant public benefits outweigh the effects on persons who own interests in relevant land or who may be affected by the Project.

Reference	Theme	Issue raised	The Applicant's response
			The Applicant responds to the specific concerns regarding plots at Low Hill Farmhouse and Quest Lodge below.
RR-008-42	Landowner engagement	7.2. The statutory objection is directed to the Land Plans, Book of Reference, draft DCO and Schedule 5, and not to the evolving private Heads of Terms. For each affected plot, the Applicant should identify whether it seeks temporary possession, acquisition of new rights, restrictive covenants, access, maintenance, protective works or interference with private rights, and explain the purpose, extent and duration of each power. Private negotiations are reserved separately. The Representors submit that the powers sought over their land go beyond what is 'required' within the meaning of section 122(2): Southern Water has itself confirmed that the pipeline will be installed by trenchless construction requiring 'minimal surface activity' beneath the Representors' land.	The Applicant confirms that compulsory acquisition powers are sought for rights and the creation of new rights (including imposing restrictive covenants) over plots 22-006 (Mr Alexander James Charkin and Mrs Emily Marion Florence Charkin) and 22-007 (Mr Sean Pearse Kelly and Mrs Susan Kelly) shown edged black and shaded blue on Sheet 22 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2) in connection with Works No.4 as being construction of a pipeline between the Water Recycling Plant and Otterbourne Water Supply Works as shown on Sheet 22 in the Works Plans [APP-014]. The rights and restrictions sought by the Applicant in respect of the land referred to by the respondent can be found within Schedule 5 of the draft Development Consent Order [APP-023]. The need for rights and restrictions are set out in '5.4 Permanent Acquisition of Rights and Imposition of Restrictions' in the Statement of Reasons [APP-025]. The Applicant confirms that temporary possession powers are also sought over plots 22-006 and 22-007 as set out within paragraph 5.5.1 of the Statement of Reasons [APP-025]. As set out within the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition have been met and that the rights sought are necessary and proportionate in order to protect and preserve the integrity of the Project. It remains the Applicant's firm preference to reach a voluntary agreement for the acquisition of land and rights where possible and the Applicant is willing to discuss voluntary agreement requirements further with the respondent. The Applicant will continue to engage with the respondent's land agent regarding their feedback and comments on the Heads of Terms. The Applicant recently attended a site meeting with the respondent and their representative on the 13 November 2026, to discuss these points further.
RR-008-43	Location of the proposed pipeline routes	7.3. Operational convenience for Southern Water's contractor during the design and build phase does not, in the Representors' submission, satisfy the statutory test of land being "required" for the development. The Representors do not prescribe a fixed corridor width or depth in the absence of site-specific engineering evidence. They require the Applicant to justify the final three-dimensional alignment, depth and every permanent right and restriction by reference to pipeline diameter, trenchless method, geology, settlement, construction tolerance, inspection, maintenance, emergency access and interaction with existing and future services.	The Applicant would only exercise the compulsory acquisition and temporary possession powers over land actually required to deliver the Project. The Project limits and parameters set out in the DCO application provide flexibility for the detailed design to be delivered within these parameters by the Contractor once appointed. This approach ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.

Reference	Theme	Issue raised	The Applicant's response
RR-008-44	The draft DCO	7.4. The Representors respectfully invite the Examining Authority to scrutinise whether the compulsory acquisition of rights over their land is genuinely "required" within the meaning of section 122(2) of the Planning Act 2008, and whether there is a compelling case in the public interest under section 122(3) for the acquisition of rights broader than those necessary for a trenchless crossing. Any corridor and any restriction should be no wider or more onerous than the Applicant's evidence demonstrates is reasonably necessary, and ordinary residential use should not be restricted beyond demonstrated operational need. Southern Water has not identified any geotechnical, settlement or engineering constraint specific to this section of the route that would justify the 8-metre width sought, or the fallback of 6 metres sometimes discussed, and it should be required to demonstrate by reference to the specific depth, diameter and ground conditions applicable to this crossing why any such width is genuinely required.	Please see the RR-008-4 and RR-008-19 for the Applicant's response to the rights and restrictions sought on the respondent's land. For sections of pipeline installed using open-cut construction, the Applicant is seeking an easement width of 11m (5.5m either side of the pipeline). This reflects the access and operational requirements associated with maintaining and, if necessary, excavating the pipeline in the future. Notably, this represents a reduction from the Applicant's published stand-off guidance for water mains of a comparable size and depth [1], which would typically require a wider protected corridor. For sections constructed using trenchless techniques, a reduced easement width is considered appropriate, taking into account depth, construction methodology and location. As the pipeline is installed at greater depth and future maintenance or operational access would be undertaken from either side of the trenchless section rather than directly above it, the same level of restriction is not required. The easement width has therefore been tailored to reflect the differing operational requirements of the construction methodologies. The Applicant is therefore satisfied that the easement widths proposed represent the minimum reasonably required to protect the pipeline and secure its safe operation over its lifetime. This reduction from the normal requirement has been communicated to the respondent's land agent on 24 July 2026 and discussed further at a meeting on the 13 November 2026. The Applicant considers that the rights sought satisfy the requirements of section 122 of the Planning Act 2008. As explained in the Statement of Reasons [APP-025], the rights sought are required for the construction, operation, maintenance, monitoring, repair and protection of the Scheme and have been limited to those rights considered reasonably necessary for those purposes. The Applicant has also sought rights rather than freehold acquisition wherever practicable in order to minimise interference with private land interests. The final detailed design of the Project is to be confirmed post-consent within the parameters secured by the draft DCO [APP-023]. The Order Land and rights sought have therefore been identified having regard to the reasonable requirements of the Project and the need to retain an appropriate but proportionate degree of flexibility.
RR-008-45	Landowner engagement	Option Term 7.5. The Representors note that Southern Water has provided inconsistent information as to the duration of the option and associated restrictions, having at one stage referred to a 10-year option period and at another to an 8-year period with a 2-year extension. The option has since been reduced to 7 years	During the course of negotiations, there was uncertainty around the duration of time that compulsory acquisition powers would be sought in Article 28 of the draft DCO [APP-023]. Additionally, the Applicant had to consider whether there was a risk of there being any delays associated to the consenting of the DCO.

Reference	Theme	Issue raised	The Applicant's response
		with no extension. The Representors request that Southern Water confirm in clear and final terms the duration of any option and associated restrictions.	Article 28 of the draft DCO [APP-023] confirms the time limit for exercise of compulsory powers to be five years and the Applicant has therefore been able to confirm the proposed 7-year option term to align with this.
RR-008-46	Landowner engagement	Valuation and Protection of the Properties 7.6. Subject to formal valuation, the preliminary assessment of the Representors' valuer, an RICS Registered Valuer, is that the easement as currently drafted would be likely to result in a material diminution in the value of Quest Lodge, given that it would restrict the full enjoyment of the property in perpetuity in a manner similar to a restrictive covenant. That assessment is preliminary and may be revised once the formal valuation has been completed.	The Applicant does not share the view that the rights and restrictions sought restrict the full enjoyment of the property in perpetuity. Nonetheless, the respondent may be entitled to make a claim for compensation under the compensation code for proven and justifiable losses. To date, despite formally requesting evidence demonstrating why the commercial offer is considered unreasonable on 28 January 2026, the Applicant is yet to receive a substantive response. The Applicant will continue to engage with the respondent on this point and has requested a copy of the preliminary assessment to consider.
RR-008-47	The draft DCO	7.7. Draft DCO Article 22 provides a starting procedure for protective works to buildings. The Representors request confirmation that the protection package covers both dwellings, outbuildings, drives, retaining and boundary structures, septic and drainage systems, water supplies and latent settlement. The Examining Authority is invited to examine whether the notice, survey, counter-notice, access, security, monitoring, dispute and remediation provisions are adequate, and whether site-specific protective provisions or an undertaking are required. Article 23 survey powers should be exercised subject to appropriate notice, scope, reinstatement and provision of results.	Article 22 in the draft DCO [APP-023] allows for protective works to be carried out to any buildings where these buildings may be affected by the authorised development. This article is required on a precautionary basis as part of the authorised development will pass at significant depth below existing buildings. The Design Principles Document [APP-076] sets out that the minimum depth of the Pipeline would be 2.5m below surface level for trenchless techniques, however it is expected that the pipeline would be deeper than this. As stated in RR-008-19, the Applicant is prepared to give the respondent a contractual commitment to a minimum depth of 8m which has been communicated to them. The final design of the Pipeline will be determined at the detailed design stage and will be informed by further investigations and surveys which will consider the presence of existing utilities and below ground assets. Requirement 3 (detailed design) in the draft DCO [APP-023] requires the development to be constructed substantially in accordance with the design principles, and any departures from this would need to be approved by the relevant planning authority. The results of the additional investigations and surveys will inform the likely risk to affected buildings and whether protective works are required. The Applicant confirms that "building" is defined in the draft DCO (APP-023) in Article 1 as including: "any structure or erection or any part of a building, structure or erection". The notice, survey, counter-notice, access, security, monitoring, dispute and remediation provisions within Article 22 are considered to be adequate and has precedent in many consented DCOs and is based on the model provision in the Infrastructure Planning (Model Provisions) (England and Wales) Order 2009. Article 23 includes provision for notices, including providing information as to the nature of the survey or investigation, and compensation relating to any loss or damage arising from the exercise of the powers under Article 23.

Reference	Theme	Issue raised	The Applicant's response
RR-008-48	Location of the proposed pipeline routes	8. OUTSTANDING INFORMATION AND SITE-SPECIFIC SAFEGUARDS 8.1. The following matters raised by the Representors remain outstanding: (a) Route-comparison evidence: The Representors were not involved in the comparison of the Spring 2025 and reverted alignments before Design Refinement 7 was published, and the application does not set out that comparison on a transparent, like-for-like basis.	For all potential design changes, the Applicant undertook a comparative evaluation of alternative designs against a range of engineering, planning and environment criteria, set out Table 5-1 of the Scheme Development Report - 1 of 3 documents [APP-073]. The Applicant amended the Pipeline route from the Spring 2025 Consultation design to the alignment in the DCO application as this option was considered to have the least impacts on various environmental receptors, and reduced disruption to existing land uses. This decision was made having regard to all feedback received from landowners. By proposing trenchless construction under land at Low Hill Farm, surface works in the proximity of properties would be avoided, amenity impacts to these properties would be reduced, nearby agricultural and business land uses would be avoided, and impacts on the environment would be reduced.
RR-008-49	Landowner engagement	(b) Depth and easement width: At the 24 September 2025 meeting, the Representors were told verbally that the tunnel depth would likely be approximately 10 metres (later described as 10-20 metres) and that the easement would be no wider than the tunnel itself. Those indications were not reflected in the Heads of Terms subsequently issued, which proposed a minimum depth of 2.5 metres and an 8-metre easement. The final depth, alignment and extent of permanent rights remain unresolved.	The Applicant refers to its response in RR-008-19 above.
RR-008-50	Landowner engagement	(c) Evidence of business impact: Despite repeated requests from the Representors' advisers, Southern Water and Dalcour Maclaren have not identified the nature of the "business operations" said to be affected by the amended route, or the evidence supporting the assertion that the impact would be adverse.	The Applicant refers to the response provided in RR-008-23.
RR-008-51	Water environment	(d) Unresolved services and environmental impacts: The refined route crosses an area of infilled land and, according to the Applicant's consultation material, a groundwater abstraction borehole within Low Hill Farmhouse which is the primary provision of water to the property the vicinity of the Representors' land. The Representors also understand that ground pumps in the nearest paddock may be restricted as a result of the scheme. None of these matters has been satisfactorily resolved despite being raised by the Representors.	The Applicant notes the concerns regarding the potential impacts on the groundwater abstraction borehole within Low Hill Farmhouse. Potential impacts on the quantity and quality of groundwater resources and any private water supplies (including Low Hill Farmhouse and pasture pumps) are considered in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) and ES Appendix 19.3 Hydrogeological impact Assessment [APP-198]. The crossing to the northeast of Low Hill Farm is considered to be located in London Clay (a low permeability bedrock) and as such there is a reduced risk to any groundwater dependent receptors. The assessment concludes that there will be no likely significant effects on groundwater resources. Precautionarily mitigation measures have been implemented as set out in ES Appendix 19.9 Outline Water Monitoring Plan [APP-204] and the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), which is secured under Requirement 6 to the draft DCO [APP-023].

Reference	Theme	Issue raised	The Applicant's response
			Section 4.3 of ES Appendix 19.9 Outline Water Monitoring Plan [APP-204] states *'Where works are proposed within 100m of a licensed or private water supply, a receptor specific water supply risk assessment will be undertaken prior to construction, which will outline mitigation and monitoring requirements.'*, whilst the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) includes the following measures: • WE1: The Contractor will adhere to the Environment Agency's Approach to Groundwater Protection (2018) framework. • WE2: The Contractor will prepare a RAMS, specific to works within Source Protection Zones in accordance with ES Appendix 19.9 Outline Water Monitoring Plan [APP-204]. • WE3: A Voids Treatment Protocol will be developed by the Contractor to set out how voids encountered during construction within the chalk will be mitigated to avoid pollution or flow impacts on groundwater bodies. • WE7: The design of piled foundations and deep structures will include a Foundation Works Risk Assessment, undertaken in accordance with relevant CL:AIRE published guidance. The Contractor will also undertake a Piling Risk Assessment to develop site-specific measures to manage risks to potable water supplies. • WE9: Wastewater from construction activities (including dewatering) will treated where necessary prior to release to foul sewer, ground or surface water to achieve compliance with the relevant consents or permits. • WE16: The Contractor will undertake any dewatering operations in compliance with the appropriate abstraction licences and discharge permits, including monitoring and mitigation measures. • WE17: Any trenchless construction works will use a methodology that excludes groundwater, unless agreed with the Environment Agency beforehand. The assessment presented in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) concludes that, on the basis of the measures described above, there would be no adverse impacts on the quality and quantity of surface and groundwater receptors. The Applicant therefore considers that potential effects on groundwater and connected private water supplies have been appropriately assessed within the ES and that a proportionate and enforceable framework of mitigation and control measures has been established through the management plans secured through Schedule 2 to the draft DCO [APP-023]. In addition, the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) also includes measures to ensure that land drainage is managed appropriately during construction. Specifically, Measure WE4 commits the Contractor to prepare a Construction Drainage Plan that sets out specific measures to reduce water within the working area and ensure ongoing drainage of surrounding land. Measure WE4 also includes a

Reference	Theme	Issue raised	The Applicant's response
			commitment for a specialist drainage contractor to undertake a pre-construction survey and develop a Post-Construction Drainage Plan to guide the reinstatement of site drainage to at least the same condition as recorded prior to commencement of construction. The assessment presented in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) concludes that, on the basis of the measures described above, there would be no adverse impacts on flood risk or surface water drainage. The Applicant therefore considers that drainage of the paddocks at Low Hill Farm will not be adversely affected by the Project. The Applicant will continue to work with the landowner to ensure that the private water supply and operation of the ground pumps are not adversely affected by the Project during the construction and operation.
RR-008-52	Landowner engagement	8.2. The Representors submit that these matters require examination and resolution before the Order is made, since each of them affects the extent of the permanent burden on their homes and the adequacy of the safeguards secured for them.	The Applicant notes this comment.
RR-008-53	Water environment	8.3. The Representors request a site-specific hydrogeological conceptual model and risk assessment addressing tunnelling, shafts and compounds, drilling fluids, dewatering, mobilisation from infilled or contaminated ground and changes to groundwater pathways. A secured groundwater and private-supply protection plan should specify baseline water level, yield and quality monitoring; monitoring locations and frequency; trigger and action levels; incident notification; investigation; an uninterrupted alternative supply where required; remediation; and post-construction monitoring. The Applicant should identify what is controlled by the DCO, CEMP and OEMP and what remains subject to Environment Agency permitting.	See response to RR-008-51. In particular, the ES Appendix 19.9 Outline Water Monitoring Plan [APP-204] states: *'Where works are proposed within 100m of a licensed or private water supply, a receptor specific water supply risk assessment will be undertaken prior to construction, which will outline mitigation and monitoring requirements.'* The scope of the assessment will be determined and approved by the relevant authorities (e.g. the Environment Agency) during development of the detailed Water Monitoring Plan post-consent. This will be secured under Requirement 16 in Part 1 of Schedule 2 to the draft DCO [APP-023]. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and the ES Appendix 19.9 Outline Water Monitoring Plan [APP-204] will be secured through Schedule 2 to the draft DCO [APP-023].
RR-008-54	Construction impacts and effects	8.4. The Applicant identifies an area of infilled land in this refinement. The Representors request identification of the extent and composition of the infill, the ground model and groundwater conditions, the proposed trenchless method and drilling fluids, and a site-specific settlement assessment for both dwellings, drives, structures and services. Before works commence, the final alignment and method should be supported by adequate investigation, agreed condition surveys, predicted settlement contours, monitoring locations and frequency, trigger and stop-work levels, emergency response, security and prompt remediation, with an appropriate post-construction monitoring period.	The areas of infilled land being referred to in the RR are not identified and may refer to potentially infilled land identified in or surrounding Low Hill Farm. Potential Sources of Contamination PSC 197, 198 and 199 may be infilled ponds on or adjacent to Low Hill Farm. PSC 524 which may be potentially infilled land drains east of Low Hill Farm and is shown in the Figures section of ES Appendix 11.2 Geotechnical and geo-environmental reports - 9 of 18 documents (Document reference 6.2, DCO Volume 6, Version 1). Project-specific ground investigations have been undertaken along the route of Section L. As part of the Ground Investigation (GI); soil, soil leachate and groundwater samples were collected and sent for laboratory analysis in locations deemed suitable at the time of the design proposed. The design at the time of the desk study and ground investigation envisioned an open cut pipeline construction north of Low Hill Farm. This was modified after the ground investigation to a trenchless construction. A summary of the results of

Reference	Theme	Issue raised	The Applicant's response
			the GI, including the contaminants identified, is provided within paragraphs 11.7.183 to 11.7.187 of ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1), with further details provided within ES Appendix 11.2 Geotechnical and geo-environmental reports - 9 of 18 documents (Document reference 6.2, DCO Volume 6, Version 1). Please refer to the Applicant's response to RR-008-51 for details regarding the risk of the infilled land on groundwater contamination. The final design of the Pipeline will be determined at the detailed design stage and will be informed by further investigations and surveys, which will consider site-specific requirements and construction methodology. Construction-induced ground movements affecting receptors in the ZoI will be identified by the Contractor, who will implement good practice measures, including monitoring before, during and after the works to avoid or reduce any impact of settlement and sub-surface movement during construction, as set out in measure LQGC15 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1) further highlights how ground and, by extension, infill has also been assessed, outlining the assessment methodology in section 11.5 and borehole results further detailed in section 11.7. Primary and tertiary mitigation methods have also been highlighted to reduce environmental and construction effects on the ground and when handling infill material.
RR-008-55	Location of the proposed pipeline routes	8.5. The Applicant's published responses leave material details to surveys and detailed design. The Representors therefore request a consolidated response identifying: (i) the final design envelope and approval mechanism;	The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) commits the Pipeline to be installed using trenchless construction. The final design of the Pipeline will be determined at the detailed design stage and will be informed by further investigations and surveys which will consider the presence of existing utilities and below ground assets. The Works Plans – 3 of 3 documents [APP-014] control the horizontal deviation of the trenchless construction. Requirement 3 (detailed design) in the draft DCO [APP-023] requires the development to be constructed substantially in accordance with the design principles, and any departures from this would need to be approved by the relevant planning authority. Requirement 6 (construction environmental management plan) in the draft DCO [APP-023] also required a construction environmental management plan to be submitted and approved by the relevant planning authority prior to commencement of construction. These submitted construction environment management plans must be substantially in accordance with the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3).

Reference	Theme	Issue raised	The Applicant's response
RR-008-56	Location of the proposed pipeline routes	(ii) the relationship to the dwellings, structures and private services;	The final design of the Pipeline will be determined at the detailed design stage. Prior to construction of the Project, engagement will be undertaken with landowners to determine the final location of the pipeline. A full utility survey would be carried out by the contractor, once appointed, to locate any service in the vicinity of the pipeline route as part of this engagement. The DCO application provides for further investigation where necessary, with relevant measures secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). The Contractor will refresh data on the locations of utilities at reasonable appropriate points during the design and construction of the Project to provide relevant information to plan, manage, monitor and co-ordinate health and safety in the construction phase. The risk of damage to utilities will be managed through the Contractor's Permit to Dig which will include details for avoidance of utilities and an emergency response which will be employed should a utility be damaged.
RR-008-57	Construction impacts and effects	(iii) the ground, infill, settlement and contamination evidence;	Project-specific ground investigations have been undertaken along the route of Section L. As part of the Ground Investigation (GI) soil, soil leachate and groundwater samples were collected and sent for laboratory analysis. A summary of the results of the GI, including the contaminants identified, is provided within paragraphs 11.7.183 to 11.7.187 of ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1), with further details provided within ES Appendix 11.2 Geotechnical and geo-environmental reports - 9 of 18 documents (Document reference 6.2, DCO Volume 6, Version 1). ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1) further highlights how ground and, by extension, infill has also been assessed, outlining the assessment methodology in section 11.5 and borehole results further detailed in section 11.7. Primary and tertiary mitigation methods have also been highlighted to reduce environmental and construction effects on the ground and when handling infill material. As detailed in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), the Contractor will prepare a plan for dealing with unforeseen contamination, including the need for a watching brief and discovery strategy, in accordance with current guidance and legislation. Should visual and/or olfactory indicators of contamination (including asbestos) be encountered, works will cease in that area and advice will be sought from a suitably qualified geoenvironmental professional.
RR-008-58	Water environment	(iv) the borehole and private-supply assessment and protection plan;	The Applicant notes the request to see a borehole and private-supply assessment and protection plan. The Applicant's approach to mitigation of risks related to private water supplies is outlined in RR-008-51. In particular, the ES Appendix 19.9 Outline Water Monitoring Plan [APP-204] states that *'Where works are proposed within 100m of a licensed or private water supply,*

Reference	Theme	Issue raised	The Applicant's response
			a receptor specific water supply risk assessment will be undertaken prior to construction, which will outline mitigation and monitoring requirements.' The scope of the assessment will be determined and approved by the relevant authorities during development of the detailed Water Monitoring Plan post-consent.
RR-008-59	Construction impacts and effects	(v) the assessed trenchless worksite, plant, programme, noise and vibration scenario; and	Impacts from noise, vibration, vehicle movements and construction compound areas and their respective effects on residential properties from trenchless construction methods are assessed within the ES across the relevant chapters: • ES Chapter 12 Land use and agriculture [APP-091] – residential amenity considers the in-combination effects from construction, operation and decommissioning of the Project on residential amenity taking into account the findings of other relevant environmental assessments, including air quality, noise, landscape and visual, and traffic and transport. The assessment concluded that it is not anticipated that the construction in this area would result in any significant in-combination effects on amenity for residential receptors, with at most a minor adverse effect. • ES Chapter 15 Noise and vibration [APP-094] – noise and vibration on human noise and vibration sensitive receptors (NVSRs) considers the in-combination effects from construction, operation and decommissioning of the Project on residential amenity taking into account the findings of other relevant environmental assessments, including air quality, noise, landscape and visual, and traffic and transport. The assessment concluded it is not anticipated that the construction of the Pipeline in this area would result in any significant in-combination effects on amenity for residential receptors, with at most a minor adverse effect. • ES Chapter 17 Socio-economics tourism and health (Document reference 6.1, DCO Volume 6, Version 1) – neighbourhood amenity considers the impact on neighbourhood amenity, defined in ES Chapter 17 as "*a combination of factors that have the potential to affect residents' feelings about, and experience of, their local environment*", from the construction, operation and decommissioning of the Project, taking into account the findings of other relevant environmental assessments, including air quality, noise, lighting, landscape, water quality and ground conditions. The assessment concluded it is not anticipated that the construction of the Pipeline in this area would result in neighbourhood amenity effects. • ES Chapter 18 Traffic and transport [APP-097] – the chapter does not assess the effects from constructing the Project on individual residents but rather assesses delays caused to all road users, severance to community members moving around their community and accessing services and facilities, fear and intimidation from the anticipated volume of traffic, accident and safety, and movement of hazardous and abnormal indivisible loads. As noted above, the findings from this assessment are used to inform the residential amenity assessment in ES Chapter 12 [APP-091].

Reference	Theme	Issue raised	The Applicant's response
			Appropriate mitigation measures that seek to avoid, reduce and mitigate the effects on residents and neighbourhood amenity, and noise and vibration are included in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). Measures that relate to the control of construction traffic are included in the Framework CTMP [APP-415] and the Traffic Management Strategy [APP-416].
RR-008-60	Landowner engagement	(vi) the final permanent rights and restrictions and the release of unused powers.	The Applicant refers to Schedule 5 of the draft DCO [APP-023] which sets out the rights and restrictions sought over the respondent's land. The Applicant also refers to its response above in RR-008-19 relating to the depth of the pipeline. Article 28 of the draft DCO [APP-023] states that the compulsory acquisition must be exercised within 5 years otherwise they will lapse. As set out in the Statement of Reasons [APP-025], the temporary possession powers allow the Applicant to occupy land for construction and ancillary activities (including site preparation) without acquiring permanent rights where those rights are not required following construction. The use of temporary possession powers therefore assists in minimising the extent of permanent compulsory acquisition. Following construction, any temporary possession rights will automatically cease in accordance with the provisions of the Order and the land will be returned to the landowner, subject to any permanent rights that have been acquired. Where permanent rights or restrictive covenants are acquired, the Applicant may retain those rights even if the extent of their exercise is ultimately less than originally anticipated, in order to ensure the continued operation, maintenance, inspection, repair, replacement and decommissioning of the Project.
RR-008-61	The draft DCO	9. HUMAN RIGHTS AND FAIR BALANCE Fair Balance and Engagement of Article 8 9.1. The compulsory acquisition of rights over residential land engages the fair-balance principle protected by Article 1 of Protocol 1 to the European Convention on Human Rights and reflected in the Government's compulsory-acquisition guidance. The Representors accept the Project's public purpose but submit that the Applicant must demonstrate why this alignment and each right or restriction are necessary, what less intrusive means were considered, and how residential and water-environment effects are minimised and secured.	For the reasons set out in the Statement of Reasons [APP-025], the Applicant considers that, on balance, the significant public benefits of the Scheme outweigh the effects on persons who own interests in relevant land or who may be affected by the Project, and that accordingly, the requirements of Article 1 of the First Protocol and section 122 of the Planning Act 2008 are satisfied. As explained in the Statement of Reasons [APP-025], ES Chapter 4 Consideration of alternatives [APP-083] and the Scheme Development Report [APP-073, APP-074 and APP-075], the Applicant has also considered alternatives to the Project and to compulsory acquisition, refined the extent of the Order Land through the design process and sought to minimise interference with private interests by acquiring rights rather than freehold interests wherever practicable. The Applicant considers that the land and rights sought are no more than reasonably necessary for the construction, operation, maintenance, monitoring, repair and protection of the Project. The effects of the Project, including on residential receptors and the water environment, have been assessed within the ES (see ES Chapter 6 Air quality

Reference	Theme	Issue raised	The Applicant's response
			and odour [APP-085], ES Chapter 12 Land use and agriculture [APP-091], ES Chapter 13 Landscape and visual [APP-092], ES Chapter 15 Noise and vibration [APP-094], ES Chapter 17 Socio-economics, tourism and health [APP-096] and ES Chapter 19 Water environment [APP-098]) and are subject to mitigation and controls secured through the draft DCO [APP-023] and associated certified documents. The Applicant considers that appropriate measures have been incorporated to avoid, reduce and mitigate adverse effects wherever practicable.
RR-008-62	The draft DCO	9.2. The Representors reserve their position under Article 8 pending the final design and the evidence concerning the nature, duration, mitigation and residual severity of effects on their homes. Compensation is addressed separately and is not relied upon as a substitute for justified route selection, adequate mitigation or properly limited powers.	The Applicant notes this comment.
RR-008-63	The draft DCO	9.3. Article 8 of the European Convention on Human Rights, as given effect in domestic law by the Human Rights Act 1998, provides that everyone has the right to respect for his private and family life, his home and his correspondence.	The Applicant notes this comment.
RR-008-64	The draft DCO	The Examining Authority and the Secretary of State are public authorities for the purposes of section 6 of the Human Rights Act 1998 and are accordingly required to act compatibly with the Representors' Convention rights in reaching a recommendation and decision on the Order. 9.4. The Representors submit that Article 8 is engaged on the facts of this case. Both Low Hill Farmhouse and Quest Lodge are the Representors' homes, and the submitted route would run in close proximity to Quest Lodge, beneath its driveway and through the most valuable and used part of its garden, restricting a significant area of residential curtilage and the Representors' use and enjoyment of their properties for the duration of the Order and, in practice, thereafter.	The Applicant notes this comment.
RR-008-65	The draft DCO	9.5. The Strasbourg case law establishes that Article 8 is engaged not only by direct physical intrusion into the home but by measures which give rise to serious interference with the ability to enjoy the home and private and family life within it, including noise, vibration and other environmental effects associated with infrastructure works in close proximity to a dwelling (Lopez Ostra v Spain (1994) 20 EHRR 277; Hatton v UK (2003) 37 EHRR 611; Fadeyeva v Russia (2007) 45 EHRR 10). The permanent easement, the restrictive Grantor Covenants affecting normal residential development and landscaping, and the construction-phase disturbance identified in Section 6 above are, taken together, sufficient to engage Article 8 in respect of both properties.	The Applicant notes this comment.
RR-008-66	The draft DCO	9.6. The particular significance the Convention attaches to the home is well established (Connors v UK (2005) 40 EHRR 9; Chapman v UK (2001) 33	For the reasons set out in the Statement of Reasons [APP-025], the Applicant considers that any interference with rights protected by Article 8 of the

Reference	Theme	Issue raised	The Applicant's response
		EHRR 18), and any interference with it, whether by direct physical works or by the imposition of restrictive rights over land forming part of the residential curtilage, requires clear and evidenced justification. Necessity and Proportionality Under Article 8(2) 9.7. Article 8(2) permits interference with the right to respect for the home only where it is in accordance with the law, pursues a legitimate aim, and is necessary in a democratic society, meaning that it must be proportionate to the aim pursued. The Representors do not dispute that the Project pursues a legitimate aim in the public interest, being the provision of national water supply infrastructure, or that a Development Consent Order granted under the Planning Act 2008 is capable of satisfying the "in accordance with the law" limb. The determinative question, therefore, is one of necessity and proportionality.	European Convention on Human Rights is justified and that an appropriate balance has been struck between the interests of affected individuals and the significant public benefits arising from the Project. The powers sought in the draft DCO [APP-023] pursue a legitimate public interest objective and are required to facilitate the construction, operation, maintenance and protection of the authorised development. The Applicant considers that those powers are necessary and proportionate having regard to the benefits that would be delivered by the Project. Throughout the Project's development, the Applicant has sought to reduce impacts on private interests through the iterative design process, refinement of the Order Land, consideration of alternatives and, where practicable, the acquisition of rights in preference to freehold interests. Accordingly, the Applicant is satisfied that the land and rights included within the draft DCO [APP-023] represent the minimum extent reasonably required to deliver, operate and maintain the authorised development.
RR-008-67	The draft DCO	9.8. The proportionality of an interference with Article 8 rights falls to be assessed both substantively, whether the measure is proportionate to the harm it addresses, and procedurally, whether the decision-making process was fair and adequately involved the person affected (South Bucks District Council v Porter (2003) UKHL 26; Connors v UK; McCann v UK (2008) 47 EHRR 40).	Please see responses above and below in relation to the proportionality assessment under Article 8. In relation to procedural fairness, the Applicant has undertaken consultation and engagement throughout the development of the Project and has continued to engage with affected landowners regarding the acquisition of land and rights. The Applicant will continue that engagement throughout the Examination and, where relevant, as the detailed design progresses. Accordingly, the Applicant considers that both the substantive and procedural requirements relevant to the assessment of proportionality have been satisfied and that a fair balance has been struck between the interests of affected landowners and the significant public benefits arising from the Project.
RR-008-68	The draft DCO	9.9. On the material presently available to the Examining Authority, Southern Water has not demonstrated that the interference with the Representors' Article 8 rights is proportionate, for the following reasons: (a) Weak comparative justification: The interference with the Representors' home and private life has been imposed in order to avoid what is understood to be a materially lesser and temporary interference with third-party interests, namely disruption to a paddock used principally for grazing and to a small parcel of arable land that frequently lies fallow (see Section 5 above). Southern Water has not demonstrated, by a like-for-like comparison, that the harm avoided by reverting the route is proportionate to the harm caused to the Representors' homes, and the position is compounded by the width of the easement sought, which has not been justified by site-specific engineering evidence as the minimum reasonably necessary;	For the reasons set out in the Statement of Reasons [APP-025], the Applicant considers that any interference with Article 8 rights is justified and that an appropriate balance has been struck between private interests and the substantial public benefits of the Project. The powers sought in the draft DCO are required to facilitate the construction, operation, maintenance and protection of the authorised development and are proportionate to the benefits the Project would deliver. The Applicant has sought to minimise impacts through the iterative design process, refinement of the Order Land, consideration of alternatives and, where practicable, the acquisition of rights rather than freehold interests. The Applicant considers that the land and rights sought are no more than reasonably necessary to deliver the authorised development. The Applicant directs the respondent to its response to RR-008-04 for details and justification of the rights sought over plots 22-006 and 22-007, and RR-008-44 for justification of the easement required

Reference	Theme	Issue raised	The Applicant's response
RR-008-69	Location of the proposed pipeline routes	(b) Absence of evidenced necessity: No cost range, comparative assumptions or comparative harm assessment has been provided in respect of the two alignments, notwithstanding that the difference in route length appears to be modest (see Section 5 above). Necessity cannot be established by unevidenced assertion;	The Applicant amended the Pipeline route from the Spring 2025 Consultation design to the alignment in the DCO application as this option was considered to have the least impacts on various environmental receptors, and reduced disruption to existing land uses. This decision was made having regard to all feedback received from landowners. By proposing trenchless construction under land at Low Hill Farm, surface works in the proximity of properties would be avoided, amenity impacts to these properties would be reduced, nearby agricultural and business land uses would be avoided, and impacts on the environment would be reduced. The Applicant did not make this decision solely on cost, distance or deliverability grounds. Instead the amendment was decided considering various matters cumulatively. As well offering some deliverability benefits the proposed design presented fewer environmental impacts and reduced impacts on nearby land uses as described above.
RR-008-70	The process of developing the Project	(c) Incomplete participation: The Representors were not involved in the comparison of the two alignments before Design Refinement 7 was published, and the material questions they raised in the Autumn 2025 targeted consultation remain dependent on post-consent surveys and detailed design (see Section 4 above). The European Court of Human Rights has repeatedly emphasised that the procedural safeguards attending an interference with Article 8 rights are integral to the proportionality assessment (Connors v UK; McCann v UK); and	The Representors were provided with the opportunity to comment on the evolving design at the Summer 2024 Consultation, the Spring 2025 Consultation and the Autumn 2025 Targeted Consultation. The Applicant had regard to stakeholder views as well as ongoing surveys and investigations. The process the Applicant undertook to develop the Project is set out in the Scheme Development Report [APP-073 to APP-075].
RR-008-71	The draft DCO	(d) Inconsistent information: The Representors were given verbal indications as to tunnel depth and easement width which, had they been reflected in the terms subsequently proposed, would have substantially reduced the interference with their land (see Sections 2 and 8 above). The final depth, alignment and extent of permanent rights remain to be fixed, and the Representors have not yet been provided with the information needed to assess the residual severity of the effects on their homes.	The Applicant refers to its response in RR-008-04 and RR-008-19 above. The Applicant most recently met with the respondent and their representatives on 13 November 2026 to discuss this point further.
RR-008-72	The draft DCO	9.10. In these circumstances, the Representors submit that Southern Water has not, on the material currently available, discharged the burden of showing that the interference with their Article 8 rights and their rights under Article 1 of Protocol 1 is necessary and proportionate. A materially less intrusive means of achieving the Project's legitimate aim was identified and then abandoned without a transparent, like-for-like justification. Human Rights as a Material Consideration for the Examining Authority	Please see responses above and below in relation to the proportionality assessment under Article 8 and Article 1 of the First Protocol. The Applicant does not accept that a materially less intrusive alternative has been identified or that the route selection process lacked transparency. The consideration of alternatives and route selection process is explained in the Statement of Reasons [APP-025], ES Chapter 4 Consideration of alternatives (APP-083] and the Scheme Development Report [APP-073, APP-074, APP-075]. The Applicant considers that all reasonable alternatives have been considered prior to the making of the Application and such consideration has included reasonable factors at relevant stages.

Reference	Theme	Issue raised	The Applicant's response
			The Applicant will continue to engage with affected landowners regarding the acquisition of land and rights throughout the Examination and as the detailed design progresses.
RR-008-73	The draft DCO	9.11. The Representors invite the Examining Authority to treat the matters raised in this Section as a material consideration in its assessment of the Project, having regard to the duty of the Examining Authority and the Secretary of State, as public authorities, to act compatibly with the Representors' Convention rights under section 6 of the Human Rights Act 1998.	The Applicant notes this comment and agrees that the Examining Authority and the Secretary of State must have regard to the requirements of Section 6 of the Human Rights Act 1998 when considering the Application. The Applicant has expressly considered the human rights implications of the Scheme and the powers sought within the Statement of Reasons (APP-025), including the effects on rights protected by Article 1 of the First Protocol and Article 8 of the European Convention on Human Rights. The Applicant considers that the powers sought pursue a legitimate public interest objective, are necessary for the delivery of the Project, and are proportionate to the substantial public benefits that would arise from the Project.
RR-008-74	The draft DCO	9.12. Where an infrastructure decision-maker has not demonstrated that an interference with Convention rights is proportionate, the appropriate course is for the interference to be avoided or minimised through the terms of the Order itself, including the route alignment, the Requirements and any protective provisions, rather than left to be addressed solely through private compensation. Compensation may address financial loss, but it does not, of itself, cure a disproportionate interference with the right to respect for the home.	For the reasons set out in the responses above and below regarding alternatives, compulsory acquisition and human rights, and as set out in the Statement of Reasons [APP-025], the Applicant considers that the powers sought in the draft DCO are necessary and proportionate, that the land and rights sought are no more than reasonably required, and that a fair balance has been struck between the rights of affected landowners and the significant public benefits which would arise from the Project. Compensation is one aspect of that overall balance, but not the sole basis upon which the Applicant relies. Accordingly, the Applicant does not agree that further amendments to the draft DCO [APP-023] are required.
RR-008-75	Location of the proposed pipeline routes	9.13. Accordingly, the Representors submit that the Examining Authority should require Southern Water to demonstrate, with proper evidence, that no less intrusive alternative to the submitted route is reasonably available, and that each right and restriction sought over their land is necessary, before the Order is made in its current form.	The Applicant amended the Pipeline route from the Spring 2025 Consultation design to the alignment in the DCO application as this option was considered to have the least impacts on various environmental receptors, and reduced disruption to existing land uses. This decision was made having regard to all feedback received from landowners. By proposing trenchless construction under land at Low Hill Farm, surface works in the proximity of properties would be avoided, amenity impacts to these properties would be reduced, nearby agricultural and business land uses would be avoided, and impacts on the environment would be reduced.
RR-008-76	Location of the proposed pipeline routes	CONCLUSIONS AND RELIEF SOUGHT 10.1. For the reasons set out above, the Representors respectfully submit that: (a) Southern Water's stated justification for the selection of Design Refinement 7 (Low Hill Farm) is not supported by adequate or transparent evidence;	The Applicant amended the Pipeline route from the Spring 2025 Consultation design to the alignment in the DCO application as this option was considered to have the least impacts on various environmental receptors, and reduced disruption to existing land uses. This decision was made having regard to all feedback received from landowners. By proposing trenchless construction under land at Low Hill Farm, surface works in the proximity of properties would be avoided, amenity impacts to these properties would be reduced, nearby agricultural and business land uses would be avoided, and impacts on the environment would be reduced.

Reference	Theme	Issue raised	The Applicant's response
RR-008-77	Location of the proposed pipeline routes	(b) The application does not provide a transparent, like-for-like account of the evidence and assumptions used to select Design Refinement 7 in preference to the Spring 2025 alignment;	The Applicant amended the Pipeline route from the Spring 2025 Consultation design to the alignment in the DCO application as this option was considered to have the least impacts on various environmental receptors, and reduced disruption to existing land uses. This decision was made having regard to all feedback received from landowners. By proposing trenchless construction under land at Low Hill Farm, surface works in the proximity of properties would be avoided, amenity impacts to these properties would be reduced, nearby agricultural and business land uses would be avoided, and impacts on the environment would be reduced.
RR-008-78	Location of the proposed pipeline routes	(c) The indications given verbally at the 24 September 2025 meeting as to tunnel depth and easement width were not reflected in the terms subsequently proposed, and the final depth, alignment and extent of permanent rights remain unresolved;	The Applicant refers to its response in RR-008-19 above.
RR-008-79	Location of the proposed pipeline routes	(d) The submitted route imposes a materially greater burden on the Representors' residential properties than the amended route would have imposed on neighbouring land, and that difference has not been shown to be justified;	The Applicant amended the Pipeline route from the Spring 2025 Consultation design to the alignment in the DCO application as this option was considered to have the least impacts on various environmental receptors, and reduced disruption to existing land uses. This decision was made having regard to all feedback received from landowners. By proposing trenchless construction under land at Low Hill Farm, surface works in the proximity of properties would be avoided, amenity impacts to these properties would be reduced, nearby agricultural and business land uses would be avoided, and impacts on the environment would be reduced.
RR-008-80	Location of the proposed pipeline routes	(e) Material site-specific matters, including ground conditions, settlement, private services, the groundwater abstraction borehole and any connected private supply, remain dependent on post-consent surveys and detailed design;	The Applicant refers to its earlier responses on ground conditions, settlement, utilities and the borehole at RR-008-5, RR-008-7, RR-008-8, RR-008-29, RR-008-32, RR-008-34, RR-008-51, RR-008-54, RR-008-56, RR-008-57 and RR-008-58. The Project limits and parameters set out in the DCO application provide flexibility for the detailed design to be delivered within these parameters by the Contractor once appointed. This approach ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-008-81	Landowner engagement	(f) The compulsory acquisition powers sought over the Representors' land, including the width of the proposed easement and the range of rights and restrictions sought, have not been shown to be necessary for, or proportionate to, the purposes of the Project within the meaning of sections 122 and 123 of the Planning Act 2008; and	The Applicant refers to its responses in RR-008-19 and RR-008-60 above, as well as RR-008-41 in relation to the Planning Act 2008 compulsory acquisition tests.
RR-008-82	The draft DCO	(g) Southern Water has not shown, on the material currently available, that the interference with the Representors' rights under Article 8 of, and Article 1 of	Please see responses above in relation to the proportionality assessment under Article 8 and Article 1 of the First Protocol. As set out in the Statement of Reasons [APP-025], the powers sought in the draft DCO pursue a legitimate

Reference	Theme	Issue raised	The Applicant's response
		Protocol 1 to, the European Convention on Human Rights is necessary or proportionate, for the reasons set out in Section 9 above.	public interest objective, are necessary for the delivery of the Project and are proportionate to the significant public benefits arising from the Project. The Applicant further considers that the land and rights sought are no more than reasonably necessary and that a fair balance has been struck between the interests of affected landowners and the public interest served by the Project.
RR-008-83	Location of the proposed pipeline routes	10.2. The Representors respectfully request that the Examining Authority: (a) Require the Applicant to identify the like-for-like route-comparison evidence, assumptions and reasons for selecting Design Refinement 7;	See response to RR-008-20.
RR-008-84	Location of the proposed pipeline routes	(b) Require a verified plan showing the final design envelope, Order Limits, shafts, compounds and accesses, the dwellings, private services, the infilled land and the borehole and private supply, with measured distances;	The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) commits the Pipeline to be installed using trenchless construction. The final design of the Pipeline will be determined at the detailed design stage, and will be informed by further investigations and surveys which will consider the presence of existing utilities and below ground assets. The Works Plans – 3 of 3 documents [APP-014] control the horizontal deviation of the trenchless construction. Trenchless construction shafts and compounds would not be located on the Representors' land, as shown on Sheet 22 of the Works Plans – 3 of 3 documents [APP-014].
RR-008-85	The draft DCO	(c) Require a site-specific design, ground, settlement, services and property-protection package before the relevant works commence, identifying the DCO mechanism that secures each measure;	See response to RR-008-47. The Applicant may provide protective works to buildings where detailed surveys and investigations have concluded these are required to mitigate impacts. Requirement 3 (detailed design) in the Draft DCO [APP-023] requires the development to be constructed substantially in accordance with the design principles, and any departures from this would need to be approved by the relevant planning authority. Requirement 6 (construction environmental management plan) in the draft DCO [APP-023] also requires a construction environmental management plan to be submitted and approved by the relevant planning authority prior to commencement of construction. These submitted construction environment management plans must be substantially in accordance with the Outline CEMP [APP-412, APP-413, APP-414].
RR-008-86	Water environment	(d) Require the groundwater and private-supply assessment and the secured monitoring, alternative-supply and remediation plan described in Section 8 above;	The Applicant notes the request for a groundwater and private-supply assessment and monitoring, alternative-supply and remediation plan. The Applicant's approach to mitigation of risks related to private water supplies is outlined in RR-008-51. In particular the ES Appendix 19.9 Outline Water Monitoring Plan [APP-204] states '*Where works are proposed within 100m of a licensed or private water*

Reference	Theme	Issue raised	The Applicant's response
			supply, a receptor specific water supply risk assessment will be undertaken prior to construction, which will outline mitigation and monitoring requirements'. This will enable appropriate monitoring and control measures to be implemented to mitigate any risks to the private water supply in line with the detailed design. The scope of the assessment will be determined and approved by the relevant authorities during development of the detailed Water Monitoring Plan post-consent.
RR-008-87	Landowner engagement	(e) Test every compulsory-acquisition power and restriction sought over the Representors' plots by plot and by purpose, and require a binding post-construction narrowing and release mechanism for any rights that prove unnecessary;	The Applicant maintains that the rights sought in Schedule 5 of the draft DCO [APP-023] are justified. The Applicant confirms that compulsory acquisition powers are sought for rights and the creation of new rights (including imposing restrictive covenants) over plots 22-006 (Mr Alexander James Charkin and Mrs Emily Marion Florence Charkin) and 22-007 (Mr Sean Pearse Kelly and Mrs Susan Kelly) shown edged black and shaded blue on Sheet 22 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2) in connection with Works No.4 as being construction of a pipeline between the Water Recycling Plant and Otterbourne Water Supply Works as shown on Sheet 22 in the Works Plans [APP-014]. The rights and restrictions sought by the Applicant in respect of the land referred to by the respondent can be found within Schedule 5 the draft DCO [APP-023]. The need for rights and restrictions are set out in '5.4 Permanent Acquisition of Rights and Imposition of Restrictions' in the Statement of Reasons [APP-025]. The Applicant confirms that temporary possession powers are also sought over plots 22-006 and 22-007 as set out within paragraph 5.5.1 of the Statement of Reasons [APP-025].
RR-008-88	Location of the proposed pipeline routes	(f) Examine whether a micro-alignment, a different worksite or access position, greater depth where technically justified, or another refinement would materially reduce the effects on the Representors' properties;	The final design of the Pipeline will be determined at the detailed design stage and will be informed by further investigations and surveys which will consider the presence of existing utilities and below ground assets. As set out above, the Applicant has considered various alternatives in this location and has selected a design that reduces impacts on landowners as far as reasonably practicable.
RR-008-89	Landowner engagement	(g) Include the identified plots in a compulsory-acquisition hearing if the objections are not resolved, and include route selection, groundwater, construction effects and property protection in the examination timetable; and	The Applicant notes this comment.
RR-008-90	The draft DCO	(h) Treat the matters raised in Section 9 above as a material consideration for the purposes of section 6 of the Human Rights Act 1998, and require Southern Water to demonstrate that the interference with the Representors' rights under Article 8 of, and Article 1 of Protocol 1 to, the European Convention on Human	Please see responses above in relation to the proportionality assessment under Article 8 and Article 1 of the First Protocol. As set out in the Statement of Reasons [APP-025], the powers sought in the draft Development Consent Order [APP-023] pursue a legitimate public interest objective, are necessary for the delivery of the Project, and are proportionate to the significant public

Reference	Theme	Issue raised	The Applicant's response
		Rights is necessary and proportionate before recommending that the Order be made in its current form.	benefits arising from the Project. The Applicant further considers that the land and rights sought are no more than reasonably necessary and that a fair balance has been struck between the interests of affected landowners and the public interest served by the Project.
RR-008-91	Landowner engagement	10.3. The Representors reserve the right to develop the issues identified in this Relevant Representation in accordance with the Rule 8 examination timetable, including through witness, engineering, hydrogeological, acoustic, heritage (if applicable) and land-rights evidence. They request a compulsory-acquisition hearing concerning the affected properties of Low Hill Farmhouse and Quest Lodge if their objections are not resolved. For the avoidance of doubt, the Representors do not accept the Heads of Terms as currently drafted and have not agreed to the grant of any option, easement or other right over their land. All separate rights under the compensation code and in relation to private agreements are reserved, including the right to refer any compensation dispute to the Upper Tribunal (Lands Chamber); no compensation quantum is submitted for determination in this Relevant Representation.	The Applicant notes this comment.

Table 2-2 The Applicant's response to RR-016 from Ian Judd and Partners on behalf of Andrew Lamburne

Reference	Theme	Issue raised	The Applicant's response
RR-016-1	Landowner engagement	Please see the supporting email. 1. Key Information Name of Interest party: [REDACTED] Address: Meadow View Farm Curdridge Lane Curdridge SOUTHAMPTON SO32 2BH Email Address: [REDACTED]@dbsltd.com Telephone Number: [REDACTED] Name & Address of Property Affected: Land at Meadow View Farm Land Plan Reference No: 17-017- 14,215m² 1.42ha 3.51 acres - Acquisition Rights Linear length of pipe: 217m Use of Land: Grassland Land and Yard Land Agent Instructed: Ian Judd and Partners, 4 High Street, Bishops Waltham, Southampton, Hampshire, SO32 1AB - 01489 896422 [REDACTED]@ianjuddandpartners.co.uk	The Applicant notes this comment.

Reference	Theme	Issue raised	The Applicant's response
RR-016-2	Principle of development	2. Summary of Submission 2.1. I wish to become an interested party and submit my strongest objection to this Development Consent Order Application.	The Applicant notes this comment and welcomes the respondent to submit information which clarifies the reason(s) for their strongest objection to the Project.
RR-016-3	Location of the proposed pipeline routes	3. My property 3.1. I own Meadow View Farm, which extends to 13.95 acres (5.51ha) of land. Southern water proposes to occupy 3.51 acres of my holding to implement the Development Consent Order.	The Applicant notes this comment.
RR-016-4	Landowner engagement	3.2. The Order Limits are severed my property with 0.4 acres of land severed to the north of the pipe, this will be inaccessible for the duration of the works.	**T**he Applicant confirms that access to, and use of, retained land temporarily severed during construction of the Project will be maintained as far as reasonably practicable, through the installation of gateways to land which may otherwise be subject to temporary severance. The Applicant has detailed this commitment within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), see the Land Use and Agriculture Section LUA3 of Table 5-1 Environmental measures to be adopted during construction, as secured by Requirement 6 of the Draft DCO [APP-023].
RR-016-5	Landowner engagement	3.3. Within the Order Limits is my yard, an area used by my business to store goods.	The Applicant acknowledges the use of the land outlined by the respondent. The Applicant notes that this representation relates to land over which powers are sought for the acquisition of rights and temporary use of land in connection with the construction, operation and maintenance of the pipeline. The Applicant will continue to engage with affected landowners and occupiers as the detailed design develops, including in relation to the final location of the pipeline within the limits of deviation, with the aim of minimising impacts wherever reasonably practicable.
RR-016-6	Landscape and visual	4. Impact on the land 4.1. I am concerned by the impact on the mature oak trees on the northern and western boundary of land. These trees should be avoided.	The Applicant acknowledges this concern. The extent of tree, woodland and hedgerow loss associated with the Project is identified and assessed within ES Appendix 13.5 Arboricultural Impact Assessment (AIA) [APP-175 and APP-176 – 2 documents]. The arboricultural baseline is presented in section 3 of the AIA and the assessment of tree loss is presented in section 4.1. The tree features referred to in the representation are understood to comprise T265 to T272 and Group G117. The assessment identifies the removal of four Category A oak trees and partial removal of Group G117. Reduced working widths have been proposed to minimise the tree loss in the detailed design stage in accordance with the ES Chapter 3 Description of the Proposed Development [APP-082] and are secured through Outline CEMP Appendix A – 1 of 3, 2 of 3 and 3 of 3 documents [APP-412, APP-413 and APP-414]. The design of the Project also avoids two veteran trees to the north of this land. The extent of tree loss assessed within the AIA is based on the worst case scenario. The Project has been assessed using the Rochdale Envelope

Reference	Theme	Issue raised	The Applicant's response
			approach, with the assessment taking account of the Order Limits, Works Areas and Limits of Deviation presented in the DCO application. Environmental disciplines, including landscape architects, informed the evolution of the Project throughout the design process, from route selection and site optioneering through to the avoidance and retention of individual tree features where reasonably practicable. Through the iterative design process, the Project was refined to avoid and reduce impacts on trees, woodland and hedgerows wherever reasonably practicable. Where the loss of existing vegetation could not reasonably be avoided, the Project has been developed on the basis that impacts on valued landscape features would be mitigated through replacement planting and landscape reinstatement. The principle is stated in LVI2 of the Outline CEMP [APP-412 to APP-414 - 3 documents], that replacement planting would be provided as close as practicable to the location, type and character of the vegetation lost. Replacement planting forms a key component of the mitigation strategy where tree, hedgerow or woodland loss cannot be avoided. The measures to be implemented are secured through the Outline Landscape and Ecology Management Plan (LEMP) (Document reference 7.5, DCO Volume 7, Version 1), which includes replacement planting, landscape reinstatement and wider landscape enhancement measures.
RR-016-7	Location of the proposed pipeline routes	4.2. I have a ground source heat pump in my property with a labyrinth of pipes laid in the ground where the pipeline is proposed to be laid.	The final design of the Pipeline will be determined at the detailed design stage. Prior to construction of the Project, engagement will be undertaken with landowners to determine the final location of the pipeline. A full utility survey would be carried out by the contractor, once appointed, to locate any service in the vicinity of the pipeline route as part of this engagement. The DCO application provides for further investigation where necessary, with relevant measures secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). The Contractor will refresh data on the locations of utilities at reasonable appropriate points during the design and construction of the Project to provide relevant information to plan, manage, monitor and co-ordinate health and safety in the construction phase. The risk of damage to utilities will be managed through the Contractor's Permit to Dig which will include details for avoidance of utilities and an emergency response which will be employed should a utility be damaged. Accordingly, the presence of the ground source heat pump infrastructure would be established through the pre-construction/detailed design process and taken into account before works affecting that area are undertaken. The Applicant will continue to engage with the landowner as the detailed design progresses.
RR-016-8	EIA approach and methodology	4.3. I am concerned about the impact on my home, the dust, noise, vibration associated with the works in close proximity to my house.	The Applicant acknowledges the concern regarding the potential impacts on nearby residential properties, arising from dust, noise and vibration.

Reference	Theme	Issue raised	The Applicant's response
			The effects of the Project on residential receptors have been assessed within the ES using topic-specific assessments that identify sensitive residential receptors, predict likely significant effects and identify mitigation measures where required. Effects associated with construction and operational noise and vibration are assessed within ES Chapter 15 Noise and vibration [APP-094]. This assessment identifies sensitive residential receptors and considers the likely effects of construction activities and operation of the Project. The Applicant notes that the dwelling associated with Meadow View Farm is approximately 35m south of the closest point of the Project Order Limits, and 495m west of the closest construction compound (J-2). Where required, mitigation measures have been identified and incorporated into the Project, and the significance of residual effects has been assessed following implementation of those measures. As a minimum all construction noise impacts/effects would be mitigated through the implementation of Best Practicable Means (BPM) with additional noise and vibration mitigation measures where required. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) provides potential mitigation options; the final package of noise mitigation will be identified in a Noise and Vibration Management Plan to be submitted to each local planning authority for approval prior to commencement of construction. Activities that are vibration-generating would not take place within a proximity to Meadow View Farm that would result in adverse impacts or effects to people or property. This dwelling is more than 1km from any source of operational noise (i.e. the WRP, BPT and IPSs). Hence Meadow View Farm will not experience operational noise effects from the Project. Dust and air quality effects are assessed within ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1). This assessment considers the potential for dust generation during construction activities, including potential impacts on nearby residential properties, and identifies appropriate mitigation measures to minimise dust emissions and associated effects. As Meadow View Farm is approximately 35m west of the Order Limits at the nearest point, it does not represent a worst case location in terms of sensitivity to dust soiling or human health impacts from construction dust relative to other areas along the Order Limits. Notwithstanding this, mitigation measures commensurate to the highest level of risk for the whole Project will be implemented across all work areas, including those in the vicinity of Meadow View Farm. Measures to control construction-related environmental effects, including dust and noise and vibration, are detailed within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). All appropriate mitigation measures will be included in the detailed CEMPs, which will be

Reference	Theme	Issue raised	The Applicant's response
			produced and submitted for approval in accordance with the corresponding requirement in Schedule 2 to the draft DCO [APP-023]. The Applicant therefore considers that the likely significant effects of dust, noise and vibration on nearby residential properties have been appropriately assessed and that suitable mitigation and management measures have been identified and secured through the DCO application documents.
RR-016-9	Location of the proposed pipeline routes	4.4. My land is seasonal wet, it will flood and be difficult to work on this land during the winter months.	The Outline CEMP - 1 of 3 documents [APP-412] sets out measures to manage the risk of flooding during the construction phase. This will include implementing drainage for managing surface water and appropriate flood risks inclusive of seasonal variations. As per the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) the Contractor will be required to prepare a Construction Drainage Plan that will need to address these issues. The Construction Drainage Plan measures as set out in WE4 and WE5.
RR-016-10	Location of the proposed pipeline routes	5. Southern Waters Conduct to date 5.1. I am not aware of any surveys, engineers or designers visiting my property. I do not believe they can have enough information on the land to design and build this pipeline. I believe further work is needed before this application can be examined.	The Applicant considers that sufficient information has been gathered to inform the DCO application. In June 2026 the Secretary of State decided that the DCO application satisfied the acceptance tests under section 55 of the Planning Act 2008. The DCO application is based on an outline design, with the detailed design being developed following approval of the DCO application by the contractor once they are appointed. The detailed design will be informed by further relevant physical surveys and investigations. According to records held by the Applicant, approximately 24 ecological and archaeological surveys have been carried out at this location, the dates of which are set out below. A copy of this information can be provided to the respondent if requested. • August, October and November 2022 • November and December 2023 • January, April, May and August 2024 • May, September and October 2025
RR-016-11	Landowner engagement	5.2. I haven't had any meetings with anybody from Southern Water, they keep writing to me, however they have not been to the land or spoken to me directly.	The Applicant has written to the respondent's representative inviting a meeting to discuss the project on 2 April 2026 and 17 July 2026. The Applicant spoke directly with the respondent's representative on 13 May 2026 to discuss the voluntary agreement to secure the rights for the construction, operation and maintenance of the pipeline but the opportunity to discuss this further at the subsequent meeting offer was not accepted by the respondent's representative.

Reference	Theme	Issue raised	The Applicant's response
			The Applicant remains open to a site meeting with the respondent and has engaged further with the respondent's representative on 11 September 2026 following receipt of the respondent's relevant representation. The Applicant has since organised a meeting with the respondent for 1 December 2026.
RR-016-12	Location of the proposed pipeline routes	6. Scale of the Land Take 6.1. On our property the order limits extending to 3.51 acres for 217 linear meters of pipe, which equates to an average of 65.5mm in width, with a maximum width of around 100m. 6.2. This is a huge land take for a 0.80m pipe. These rights should be restricted to what is necessary, proportionate and justified. We do not believe this quantum of land take has been fully justified within the submission.	The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. In this location, flexibility in the Order Limits is required so that the loss of trees can be reduced as far as practicable, taking account of the project requirements and detailed design following approval of the DCO application. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs. The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414]). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width on either side of the length that is reduced may need to be widened up to 50m for a maximum length of 42m. This informs the land area and powers set out in the DCO.
RR-016-13	Construction impacts and effects	6.3. The scale of the working area, 40m wide is unnecessary, disproportionately and unjustified. This should be reduced to 20m maximum width. Southern Water can rent other land if they need more storage. 6.4. There is any justification or explanation of the easement width. we have assessed other water providers easement width and the typical easement width for an 800mm pipe is 8m total width.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, which is secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide the necessary space for a haul road, construction working areas, material storage areas, pipeline trench and soil storage areas. This is set out at section 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m, over a distance of a maximum of 42m.

Reference	Theme	Issue raised	The Applicant's response
			The haul road/working area must be a sufficient width to allow a suitably sized excavator to track back at 90 degrees to the pipe to lift it and then lower into the trench. A suitably sized excavator capable of carrying out a tandem lift of a string of pipes would circa 11m long hence the 11m required. The working area for the trench excavation is calculated using the width of the excavator capable of pipeline installation (circa 3.5m) and a 2m deviation of the pipeline route in each direction without compromising the pipelaying process. If the pipeline has to change direction the joints are designed to allow a slight angle deviation to alter the direction this is a gradual process and requires sufficient space to allow for it. Therefore, a total of 7.5m. The pipe storage/jointing area must be wide enough to allow the pipes to be welded together to form the strings before lowering into the trench. As there will be welders working on this while the excavator is operating a 1m safety exclusion zone has to be in place. The total of the pipe storage/jointing area is therefore a total of 3.5m The area required for topsoil storage is based on topsoil being 200mm thick, which equates to $8m^3$ for a 40m working width. With a side slope of 1:1 and maximum height of 1.8m an area of 7m has been allocated which includes for any bulking factor. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The area required for subsoil provides enough width in this area to segregate upper and lower subsoils, therefore there would be two separate mounds, which ensures the subsoil can be reinstated properly. A 1:1 side slope and a bulking factor has been incorporated which equates to 7m. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The above areas equate to a working width of 40m. If part of the required construction storage were to be located off-site, this would significantly increase the duration of construction works and the number of construction vehicle movements on the highway network. Both of these factors would result in adverse impacts on the environment and local communities. In accordance with the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition have been met. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits, whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) sets out the maximum diameter of the pipelines for the different Project components, which may be greater than the 800mm referenced by the Respondent. The Applicant considers the permanent rights sought are justified in order to protect and preserve the integrity of the Project.

Table 2-3 The Applicant's response to RR-030 from Arash Rad

Reference	Theme	Issue raised	The Applicant's response
RR-030-1	Landowner engagement	Hampshire Water Transfer and Water Recycling Project - WA010002 I am an owner and resident of a residential property which Southern Water, through its appointed land agent Dalcour Maclaren, has identified as potentially being affected by the proposed deep tunnel forming part of this Project. I do not presently object to the principle or purpose of the Hampshire Water Transfer and Water Recycling Project as a whole. I do, however, object to the compulsory acquisition of subsoil, imposition of new rights, restrictive covenants or other permanent restrictions over my property in circumstances where the eventual tunnel alignment and resulting impact upon my property remain insufficiently defined.	The Applicant notes the respondent's comments. Each of the respondent's concerns are addressed by the Applicant in the responses below.
RR-030-2	Location of the proposed pipeline routes	My principal concerns are: • The uncertainty over whether and precisely where the tunnel will pass beneath my property; • The apparently substantial flexibility remaining over its eventual alignment; • The possibility that a comparatively small adjustment to the detailed alignment could avoid my residential property altogether; • The permanent effect that the tunnel protection regime could have upon future development beneath my house and/or garden; • The fact that i genuinely intend to begin progressing substantial development of the property within approximately the next 12-18 months; and • The apparent possibility of compulsory powers being granted before the full consequences for an individual residential property are known.	The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. Flexibility has been retained in the design of the Pipeline between the WRP site and Portsdown Hill as this would be constructed as a tunnel, and further refinement will be undertaken at the detailed design stage following investigations and engagement with National Highways and Network Rail. The Scheme Development Report [APP-073 to APP-075] sets out how the location of the Pipeline has developed. Consideration was given to a location further north (Corridor Section Q) early in the scheme development process however this was ruled out due to constructability, hydraulics and engineering constraints. Further information is provided in Appendix C (Scheme Development Report – 2 of 3 documents [APP-074]). The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The design of the Project as set out in the DCO application provides flexibility for refinement informed by further surveys and investigations at the detailed design stage. The detailed design will be developed following approval of the DCO application and the appointment of a Contractor. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-030-3	Location of the proposed pipeline routes	1. My property's position relative to the proposed corridor The published project mapping shows my residential property at or very close to the edge of the wider affected project corridor in this location.	The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. Flexibility has been retained in the design of the Pipeline between the WRP site and Portsdown Hill as this

Reference	Theme	Issue raised	The Applicant's response
		I appreciate that the online project boundary is stated to be illustrative and that the formal application plans ultimately govern. However, its apparent position is highly relevant to my concern. My property does not appear to sit in the middle of an unavoidable narrow route. It appears to be towards the margin of a substantially wider corridor within which the eventual tunnel alignment may subsequently be refined. This means that a comparatively small change in the eventual centreline may potentially determine whether private residential land and its future development potential are affected at all. I therefore ask the Examining Authority to examine carefully whether an engineering-feasible alignment can be selected which avoids my residential property and other residential freeholds wherever reasonably practicable. Where the Applicant has flexibility during detailed design, I consider that avoiding or minimising permanent interference with private residential property should be an express consideration when the final alignment is selected.	would be constructed as a tunnel, and further refinement will be undertaken at the detailed design stage following investigations and engagement with National Highways and Network Rail. The Scheme Development Report [APP-073to APP-075] sets out how the location of the Pipeline has developed. Consideration was given to a location further north (Corridor Section Q) early in the scheme development process however this was ruled out due to constructability, hydraulics and engineering constraints. Further information is provided in Appendix C (Scheme Development Report – 2 of 3 documents [APP-074]). The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The design of the Project as set out in the DCO application provides flexibility for refinement informed by further surveys and investigations at the detailed design stage. The detailed design will be developed following approval of the DCO application and the appointment of a Contractor. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-030-4	Location of the proposed pipeline routes	2. The final alignment remains unknown I have sought clarification directly from Dalcour Maclaren regarding the proposed alignment beneath my property. They have confirmed to me in writing that: • The tunnel alignment remains subject to ongoing design development; • The final alignment will not be determined until detailed design following the granting of the dco; • They are presently unable to confirm whether my property will ultimately be affected; • The eventual tunnel centreline, depth and protection zones affecting individual properties will only be confirmed once detailed design has progressed. I find this particularly concerning where compulsory acquisition powers and potentially permanent restrictions upon private residential land are being sought through the present application.	The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. As set out above, this will be confirmed once the detailed design of the Project has been developed. As per the Applicant's response to RR-030-14, the Applicant has issued an FAQ document to homeowners who may be impacted by the tunnel works which give further context to the rights sought.
RR-030-5	Landowner engagement	Before such powers are granted, an affected homeowner should be able to understand with reasonable certainty: • Where the tunnel may pass relative to their property; • The present indicative centreline; • The horizontal and vertical limits within which the tunnel could subsequently be moved;	The Applicant refers to its responses to RR-30-2 and RR-30-3, with particular reference to the principles that the Applicant has *"included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed*". The following concerns are addressed in order. Regarding the alignment of the Pipeline:

Reference	Theme	Issue raised	The Applicant's response
		• The likely depth beneath that particular property; • The potential extent of any excavation zone, exclusion zone, safeguard zone or other tunnel protection zone; • Precisely what subsoil or other property rights may be acquired; • What restrictive covenants or other controls could apply; and • The reasonable worst-case effect upon future use and development of the property. I ask the Examining Authority to scrutinise whether the degree of post-consent flexibility being sought is necessary and proportionate, particularly in locations where that flexibility could determine whether individual residential properties are affected. I also ask that consideration be given to narrowing the permitted limits of deviation in locations where doing so could avoid or materially reduce interference with residential property.	• The design of the Project as set out in the DCO application provides flexibility for refinement informed by further surveys and investigations at the detailed design stage. The detailed design will be developed following approval of the DCO application and the appointment of a Contractor. This approach ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs. The Scheme Development Report [APP-073 to APP-075] sets out the process the Applicant has undertaken to determine the location of the Pipeline. • The respondent's land is in Section D of the Project. The Applicant has included a new design principle which states that the Pipeline would be installed at a minimum depth of 15m below surface level within this area. This is reflected in an updated version of the Design Principles Document submitted at Deadline 1 (Document reference 5.11, DCO Volume 5, Version 1). The minimum depth is to provide sufficient clearance for any existing infrastructure and minimise above ground disturbance as far as possible. This represents the most detailed Pipeline route available and will be subject to further refinement as part of detailed design, included in the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). • The Applicant acknowledges that the gap between a DCO decision and the subsequent detailed design can cause frustration to those potentially affected by a project. However, it is well precedented that detailed design is secured by way of a requirement of the DCO. Detailed design is secured by Requirement 3 in Schedule 2 Part 1 to the Draft Development Consent Order [APP-023]. The detailed design must be approved by the relevant planning authority and prepared in line with the relevant design principles, as set out in the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). Regarding the property rights, covenants and reasonable worst case effect: • The rights and restrictive covenants to be acquired are set out in Schedule 5 to the Draft DCO [APP-023] which the Applicant will be updating at a future deadline to confirm that no rights will exist to enter onto the surface of the plots subject to the rights save for survey and monitoring purposes during construction of the tunnel where necessary. • Whilst the Applicant has identified plot 04-094 for acquisition of rights and restrictive covenants, the respondent should continue to enjoy property rights until such an acquisition is made. Should the basement be developed prior to the rights and restrictive covenants being acquired, the Applicant would need to factor its presence into the detailed design. In the event that

Reference	Theme	Issue raised	The Applicant's response
			the Applicant acquired rights and restrictive covenants over all or part of plot 04-094 prior to development of the basement and it was found that the tunnel depth was insufficient to enable the basement's development, the respondent would be entitled to make a claim for compensation under the compensation code for disturbance compensation for abortive costs incurred where they can be proven and are justified. As stated, the Applicant wrote to the respondent on 22 September 2026 seeking further information on this proposed development and offering a meeting to discuss the proposal further.
RR-030-6	Landowner engagement	3. Genuine near-term intention to develop beneath the property The impact upon future below-ground development is not a theoretical concern raised merely because I have received notice of the Project. I have a genuine intention to investigate and pursue substantial development of my property, potentially including the creation of accommodation and/or other usable space beneath the existing house and/or garden. My present intention is to begin progressing the feasibility, architectural design, engineering and planning aspects of such development within approximately the next 12-18 months. I also anticipate being in a financial position to fund a substantial development of this nature within that timeframe. These intentions have arisen independently of the Southern Water Project. The exact design and extent of the development will necessarily depend upon architectural, planning, structural and geotechnical advice. I am not suggesting that a final basement design or planning application presently exists. However, the ability to utilise the land below ground level is a genuine development opportunity that I intend to investigate and progress, rather than a speculative possibility raised solely in response to the proposed tunnel.	The Applicant wrote to the respondent on the 22 September 2026 seeking to discuss the potential design and depth of the proposed basement below the existing property. Whilst it is unlikely the Applicant will be able to provide any additional certainty to the respondent on the route of the tunnel during the 12 to 18 month window stated, the Applicant will continue to engage and share updated information when possible.
RR-030-7	Landowner engagement	4. The Project is already creating uncertainty for that development The uncertainty created by the Project is itself relevant to my present use and enjoyment of the property and the decisions I need to make about its future development. Before committing substantial sums to architects, structural engineers, geotechnical investigations and planning work, I need to understand: • Whether Southern Water intends to take rights beneath my property; • Where the tunnel may ultimately be positioned; • What protection zones may apply; • Whether my intended development would remain feasible; and	Whilst the Applicant has identified plot 04-094 for acquisition of rights and restrictive covenants, the respondent should continue to enjoy property rights until such an acquisition is made. Should the basement be developed prior to the rights and restrictive covenants being acquired, the Applicant would need to factor its presence into the detailed design. In the event that the Applicant acquired rights and restrictive covenants over all or part of plot 04-094 prior to development of the basement and it was found that the tunnel depth was insufficient to enable the basement's development, the respondent would be entitled to make a claim for compensation under the compensation code for disturbance compensation for abortive costs incurred where they can be proven and are justified.

Reference	Theme	Issue raised	The Applicant's response
		• What additional engineering requirements or costs might result solely from the presence of the tunnel. It would be unreasonable for the absence of a fully designed basement scheme today subsequently to be treated as evidence that no genuine development intention existed, when the unresolved Southern Water proposal is itself a material uncertainty which I must take into account before committing significant expenditure to such a design.	As stated, the Applicant wrote to the respondent on 22 September 2026 seeking further information on this proposed development and offering a meeting to discuss the proposal further.
RR-030-8	Landowner engagement	5. Restrictions may arise far above the tunnel itself The Applicant has indicated that the tunnel would be approximately 4 metres in diameter and would generally be constructed at a minimum depth of approximately 15 metres. My concern is not simply the physical presence of infrastructure at that depth. Southern Water's own guidance indicates that within the relevant protection area: • Excavation may generally take place to a depth of only 2.5 metres without further involvement; • Proposed works extending below 2.5 metres may require consultation with southern water and an engineering assessment; • Certain activities within a safeguard zone may be restricted; and • Works capable of affecting the tunnel within an exclusion zone may be prohibited. There is therefore potentially a very substantial difference between the depth of the tunnel and the depth at which the Project could begin to interfere with the ordinary future development of the property. A conventional residential basement may extend beyond 2.5 metres while remaining many metres above a tunnel situated approximately 15 metres below ground. I am therefore concerned that the Project could effectively sterilise or materially constrain a much larger volume of my land than the physical subsoil occupied by the tunnel itself.	It is critical that this infrastructure is protected from potential future development that may impact the structural integrity of the tunnel and therefore protection measures are required. The Applicant has included a new design principle which states that the Pipeline would be installed at a minimum depth of 15m below surface level within this area. This is reflected in an updated version of the Design Principles Document submitted at Deadline 1 (Document reference 5.11, DCO Volume 5, Version 1). The minimum depth is to provide sufficient clearance for any existing infrastructure and minimise above ground disturbance as far as possible. This represents the most detailed Pipeline route available and will be subject to further refinement as part of detailed design. The Applicant has issued an FAQ document to homeowners who may be impacted by the tunnel works which give further context to the rights sought. The Applicant welcomes a meeting with the respondent to enable early engagement on the proposed development of the basement.
RR-030-9	Legislation, policy and permits	6. Future consent and engineering requirements remain unclear I have asked the Applicant's land agent what would happen if I subsequently sought to construct a basement or undertake other substantial below-ground works. While I have been told that proposals would be considered on a case-by-case basis, important questions remain unanswered. In particular, I have not been provided with clear information explaining:	The Applicant notes this comment. The Applicant has issued an FAQ document to homeowners who may be impacted by the tunnel works which give further context to the rights and restrictions sought. The FAQ includes information such as: • The tunnel having an approximate external diameter of 4m. • The depth of the tunnel generally being no less than 15 metres; this is reflected in an updated version of the Design Principles Document

Reference	Theme	Issue raised	The Applicant's response
		• The objective engineering criteria Southern Water would use to determine whether development could proceed; • The circumstances in which Southern Water could refuse consent; • Whether Southern Water could require redesign of an otherwise acceptable development; • Whether additional foundations, structural protection or other engineering measures could be required; • Who would bear the cost of those measures; • Who would bear Southern Water's own assessment or monitoring costs; • Whether Southern Water's approval would be required permanently; • Whether there would be an independent mechanism to challenge a refusal or unreasonable conditions; and • How any restrictive rights would appear against the property's registered title. The result could otherwise be that development which would have been technically and financially viable in the absence of the Project becomes impossible, materially more expensive or permanently dependent upon the discretion of Southern Water.	submitted at Deadline 1 (Document reference 5.11, DCO Volume 5, Version 1). • How the tunnel is constructed. • Confirmation of the process to acquire the necessary rights and the compensation arising. • When it is anticipated the acquisition of subsoil rights would take place. The Applicant encourages the respondent to provide information on their proposed future uses for the property so that they can be considered now and a more informed response provided on this point. The detailed design will be refined by a number of factors, including the fixed connection points and shaft locations, constructability, ground conditions and geotechnical data as well as existing infrastructure and third-party assets. The Applicant welcomes information from all affected parties who have plans to development their property so that, where possible, such developments can be considered during preparation of the detailed design. The Applicant confirms that further engagement will be undertaken with affected landowners during the preparation of the detailed design.
RR-030-10	Legislation, policy and permits	7. Protection for reasonable future residential development I ask the Examining Authority to consider whether adequate safeguards should be incorporated into the DCO so that residential landowners are not subjected to unnecessarily broad or disproportionate restrictions. In particular, I ask that consideration be given to provisions which ensure that: • Residential properties are avoided by the final tunnel alignment where a reasonably practicable alternative exists; • Within any authorised corridor, the detailed alignment is selected so as to minimise interference with the reasonable future development of residential land; • Rights acquired are no wider than demonstrably necessary for the safe construction, operation and maintenance of the tunnel; • Southern water cannot unreasonably withhold or delay approval for reasonable future development; • Clear and objective engineering criteria govern such decisions; • There is an appropriate independent mechanism for resolving disputes; • The applicant considers reasonable engineering solutions before prohibiting development outright; and	The Applicant has assessed site and route options against a range of criteria including planning, engineering and environmental criteria, including potential impacts on land use, when making any decisions regarding the Pipeline route refinement. In response to the particular comments: • *"Residential properties are avoided by the final tunnel alignment where a reasonably practicable alternative exists"* The Scheme Development Report [APP-073 to APP-075 - 3 documents] sets out the process the Applicant has taken to consider alternative pipeline routes. The final design of the pipeline will be determined at the detailed design stage following approval of the DCO application. • *"Within any authorised corridor, the detailed alignment is selected so as to minimise interference with the reasonable future development of residential land"* Please refer to the Applicant's response to RR-030-7. • *"Rights acquired are no wider than demonstrably necessary for the safe construction, operation and maintenance of the tunnel"* The rights and restrictive covenants to be acquired are set out in Schedule 5 to the Draft DCO [APP-023], which the Applicant will be updating at a future deadline to clarify that no rights are being sought to enter onto the

Reference	Theme	Issue raised	The Applicant's response
		• Additional engineering or construction costs caused specifically by the presence of the tunnel do not unfairly fall upon an affected homeowner.	surface of the respondent's plots save for survey and monitoring purposes during construction of the tunnel where necessary. The Applicant has issued an FAQ document to homeowners who may be impacted by the tunnel works which give further context to the rights sought. The FAQ includes information such as: o The tunnel having an approximate external diameter of 4m. o The depth of the tunnel generally being no less than 15 metres, which is reflected in the updated version of the Design Principles Document submitted at Deadline 1 (Document reference 5.11, DCO Volume 5, Version 1). • How the tunnel is constructed. o Confirmation of the process to acquire the necessary rights and the compensation arising. o When it is anticipated the acquisition of subsoil rights would take place. As detailed in the Applicant's response to RR-030-07, in the event that the Applicant acquired rights and restrictive covenants over all or part of plot 04-094 prior to potential development and it was found that the tunnel depth was insufficient to enable the development or increases the cost of that development, the respondent would be entitled to make a claim for compensation under the compensation code for disturbance compensation for abortive costs incurred where they can be proven and are justified. • *"The Applicant cannot unreasonably withhold or delay approval for reasonable future development"* The rights and restrictive covenants to be acquired are set out in Schedule 5 to the Draft DCO [APP-023], which the Applicant will be updating at a future deadline to confirm that no rights will exist to enter onto the surface of the plots subject to the rights save for survey and monitoring purposes during construction of the tunnel where necessary. The Applicant encourages the respondent to provide information on their proposed future uses for the property so that they can be considered now and a more informed response provided on this point. • "*Clear and objective engineering criteria govern such decisions"* Any future development would need to be undertaken in line with any rights or restrictive covenants on the land. • *"There is an appropriate independent mechanism for resolving disputes"* As set out in the Statement of Reasons [APP-025], in the event that the Applicant acquired rights and restrictive covenants over all or part of plot 04-094 through compulsory acquisition powers, as set out in Schedule 5 to the Draft DCO [APP-023], the Applicant will seek to agree compensation with each affected landowner once the detailed design and exact route of

Reference	Theme	Issue raised	The Applicant's response
			the pipeline is known post consent. However, should any issues arise, that cannot be resolved through negotiation, or at the request of a landowner, alternative dispute resolution will be offered as a means of progressing agreement. The Applicant confirms that disputed compensation from the use of compulsory acquisition powers is ultimately resolved through referral to the Upper Tribunal (Lands Chamber). • *"The Applicant considers reasonable engineering solutions before prohibiting development outright"* The Scheme Development Report [APP-073 to APP-075 - 3 documents] sets out the process the Applicant has taken to consider alternative pipeline routes. The final design of the pipeline will be determined at the detailed design stage following approval of the DCO application. The restrictions placed on land will depend on the final location and depth of the pipeline. • "*Additional engineering or construction costs caused specifically by the presence of the tunnel do not unfairly fall upon an affected homeowner"* As detailed in the Applicant's response to RR-030-07, in the event that the Applicant acquired rights and restrictive covenants over all or part of plot 04-094 prior to potential development and it was found that the tunnel depth was insufficient to enable the development or increases the cost of that development, the respondent would be entitled to make a claim for compensation under the compensation code for disturbance compensation for abortive costs incurred where they can be proven and are justified.
RR-030-11	Location of the proposed pipeline routes	8. Consideration of alternative alignment Given the apparent position of my property towards the edge of the wider project corridor, I consider the question of alternative alignment particularly important. I am not asserting that a particular alternative route is technically feasible because the Applicant has not supplied me with sufficient engineering information to make that assessment. Instead, I ask the Applicant to demonstrate why my residential property needs to be affected at all. I ask the Examining Authority to establish: 1. What alternative tunnel alignments have been considered in the vicinity of my property; 2. Whether an alignment within the proposed corridor could avoid my property; 3. Whether highway, public or other land could reasonably be utilised instead where the permanent impact would be lower; 4. What engineering, environmental and land-impact criteria will determine the final centreline;	Flexibility has been retained in the design of the Pipeline between the WRP site and Portsdown Hill as this would be constructed as a tunnel, and further refinement will be undertaken at the detailed design stage following investigations and engagement with National Highways and Network Rail. Providing flexibility therefore provides opportunity for aligning with the requirements of National Highways and Network Rail whilst trying to avoid residential properties as far as practicable during the detailed design stage. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This will be confirmed once the detailed design of the Project has been developed

Reference	Theme	Issue raised	The Applicant's response
		5. What weight will be given to avoiding permanent restrictions upon residential property; 6. Whether the limits of deviation can be narrowed locally to protect affected homes; and 7. What meaningful opportunity an affected homeowner will have to influence the detailed alignment before it is finally selected. If an engineering-feasible alignment exists only a comparatively short distance away which avoids imposing permanent restrictions upon residential land, I consider that the Applicant should be required to give proper weight to that option.	
RR-030-12	Landowner engagement	9. Concern over decisions being deferred until after consent There appears to be an important gap between the DCO process and subsequent detailed design. The Applicant's position appears to be that the DCO should authorise the Project and associated land powers while the precise tunnel alignment affecting individual properties will only be determined afterwards. From an individual homeowner's perspective, however, the later detailed alignment decision may be the decision which matters most. It could determine whether: • My property is affected at all; • Restrictions are registered against the freehold; • Future basement development remains possible; • Additional engineering costs arise; and • The property's future use and market value are affected. I therefore ask the Examining Authority to consider whether sufficient controls exist over that later detailed-design decision and whether meaningful engagement with affected landowners should be required before the final alignment is fixed. Landowners should not simply be notified after the engineering decision has effectively been made.	The Applicant acknowledges that the gap between a DCO decision and the subsequent detailed design can cause frustration to those potentially affected by a project. However, it is well precedented that detailed design is secured by way of a requirement of the DCO. Detailed design is secured by Requirement 3 in Schedule 2 Part 1 to the Draft DCO [APP-023]. The detailed design must be approved by the relevant planning authority and prepared in line with the relevant design principles, as set out in the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). The Applicant welcomes information from all affected parties who have plans to development their property so that, where possible, such developments can be considered during preparation of the detailed design. The Applicant confirms that further engagement will be undertaken with affected landowners during the preparation of the detailed design.
RR-030-13	Landowner engagement	10. Necessity and proportionality of compulsory rights I recognise that major infrastructure projects can legitimately require rights over privately owned land. However, compulsory powers represent a significant interference with private property rights and, in relation to my property, I ask the Examining Authority to examine whether the Applicant has demonstrated that the rights sought are genuinely necessary and proportionate.	The Applicant considers that the rights sought over the respondent's plot are necessary for the safe construction, operation and maintenance of the tunnel and pipeline. The Applicant will be making an amendment to the rights and restrictive covenants in Schedule 5 to the Draft DCO [APP-023] at a future deadline to clarify that no rights are being sought to enter onto the surface of the respondent's plot save for survey and monitoring purposes during construction of the tunnel where necessary.

Reference	Theme	Issue raised	The Applicant's response
		In particular, any: • Acquisition of subsoil; • Protection zone; • Restrictive covenant; • Requirement for future consent; or • Prohibition upon development should extend no further horizontally, vertically or substantively than is reasonably necessary to protect the infrastructure. I am particularly concerned about rights which might restrict development many metres above the physical tunnel where a more targeted engineering solution could provide adequate protection with materially less interference with the freehold.	The Applicant has issued an FAQ document to homeowners who may be impacted by the tunnel works which give further context to the rights sought. The Applicant welcomes a meeting with the respondent to enable early engagement on the proposed development of the basement.
RR-030-14	Landowner engagement	11. Development potential and property value Southern Water's guidance refers to a standard payment of £50 in respect of acquisition of subsoil together with a £350 contribution towards professional fees. I understand that the precise amount of statutory compensation is not a matter for determination through this Examination, and I reserve my position entirely regarding compensation. My concern for the purposes of the Examination is the nature and extent of the rights and restrictions being authorised. The issue is not simply the market value of a small volume of deep subsoil which might otherwise have little independent use. If the protection regime associated with that subsoil acquisition prevents, restricts or substantially increases the cost of otherwise feasible development much closer to ground level, the practical effect upon the retained residential property may be considerably greater than the physical area occupied by the tunnel itself. This is particularly significant given my genuine intention to begin progressing feasibility, design and planning for substantial development of the property within approximately the next 12-18 months.	The rights and restrictive covenants to be acquired are set out in Schedule 5 to the Draft DCO [APP-023], which the Applicant will be updating at a future deadline to clarify that no rights are being sought to enter onto the surface of the respondent's plots save for survey and monitoring purposes during construction of the tunnel where necessary. The Applicant has issued an FAQ document to homeowners who may be impacted by the tunnel works which give further context to the rights sought. The FAQ includes information such as: • The tunnel having an approximate external diameter of 4m. • The depth of the tunnel generally being no less than 15 metres; this is reflected in an updated version of the Design Principles Document submitted at Deadline 1 (Document reference 5.11, DCO Volume 5, Version 1). • How the tunnel is constructed. • Confirmation of the process to acquire the necessary rights and the compensation arising. • When it is anticipated the acquisition of subsoil rights would take place. As detailed in the Applicant's response to RR-030-07, in the event that the Applicant acquired rights and restrictive covenants over all or part of plot 04-094 prior to development of the basement (as referred to by the respondent) and it was found that the tunnel depth was insufficient to enable the basement's development or increases the cost of that development, the respondent would be entitled to make a claim for compensation under the compensation code for disturbance compensation for abortive costs incurred where they can be proven and are justified. The Applicant welcomes further engagement with the respondent.

Reference	Theme	Issue raised	The Applicant's response
RR-030-015	Landowner engagement	12. Information I have requested but do not yet have Despite corresponding with the Applicant's land agent, I have not yet been provided with sufficient information to understand the full potential impact upon my property. In particular, I am seeking clarification of: • The current indicative tunnel centreline relative to my property; • The current proposed depth at this specific location; • The horizontal and vertical limits of deviation; • The relevant land plan and book of reference plot numbers; • Precisely what compulsory acquisition powers, subsoil rights or restrictive rights are sought; • The likely location and extent of the various protection zones; • The criteria for approving or refusing future below-ground development; • Responsibility for additional engineering and assessment costs; • The mechanism for challenging a refusal or unreasonable conditions; and • The mechanism by which i can influence the final detailed alignment. The fact that much of this may only be determined after the DCO is granted is itself one of the principal reasons for this representation.	The Applicant responds to the bullet points as follows: • *The current indicative tunnel centreline relative to my property* As set out in RR-030-12, it is not possible for the Applicant to provide the respondent with an indicative tunnel centreline until detailed design has been completed as a post-consent activity. • *The current proposed depth at this specific location* Whilst an exact depth cannot be confirmed until detailed design, the Applicant has confirmed the tunnel will be at a depth of at least 15m. • *The horizontal and vertical limits of deviation* The Applicant has confirmed the tunnel will be at a depth of at least 15m. The Applicant acknowledges that the Limits of Deviation in relation to plot 04-094 is the full extent of the Order Limits. Until detailed design is completed, it is not possible to provide further clarification on the Limits of Deviation. • *The relevant Land Plan and Book of Reference plot numbers;* The respondent's property is included in plot 04-094 of the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1) and sheet 4 of Land Plans (Document reference 2.2, DCO Volume 2, Version 2). • *Precisely what compulsory acquisition powers, subsoil rights or restrictive rights are sought* The rights and restrictive covenants to be acquired are set out in Schedule 5 to the Draft DCO [APP-023], which the Applicant will be updating at a future deadline to confirm that no rights will exist to enter onto the surface of the plots subject to the rights save for survey and monitoring purposes during construction of the tunnel where necessary. • *The likely location and extent of the various protection zones* The Applicant has issued an FAQ document to homeowners who may be impacted by the tunnel works which give further context to the rights sought. • *The criteria for approving or refusing future below-ground development* The Applicant encourages the respondent to provide information on their proposed future uses for the property so that they can be considered now and a more informed response provided on this point. • *Responsibility for additional engineering and assessment costs* The compensation code will apply for losses arising out of the Applicant's use of rights. However, the Applicant would not automatically be required to pay all additional costs associated with any future development proposals brought forward by the respondent. Liability would depend on how established plans for the development were at the valuation date, whether the additional work was as a direct consequence of the tunnel or right, whether the expenditure

Reference	Theme	Issue raised	The Applicant's response
			was reasonably incurred. The Applicant welcomes information from the respondent on their proposals so that they can be fully considered. • *The mechanism for challenging a refusal or unreasonable conditions* The Applicant encourages the respondent to provide information on their proposed future uses for the property so that they can be considered now and a more informed response provided on this point. • *The mechanism by which I can influence the final detailed alignment* Detailed design will be refined by a number of factors including the fixed connection points and shaft locations, constructability, ground conditions and geotechnical data as well as existing infrastructure and third-party assets. The Applicant welcomes the engagement of the respondent to the examination of the DCO where their future potential plans for the property can be factored in as a consideration to detailed design.
RR-030-16	Landowner engagement	13. What I ask the Examining Authority to consider I respectfully ask the Examining Authority to: • Examine the necessity and proportionality of any compulsory acquisition powers or restrictive rights proposed over my property; • Require the applicant to identify as precisely as possible the present alignment and limits of deviation affecting my land; • Consider whether those limits should be narrowed in the vicinity of my property; • Require the applicant to demonstrate whether the final tunnel alignment can reasonably avoid my residential property; • Examine alternative alignments which could avoid or materially reduce interference with residential freeholds; • Establish how the reasonable future development potential of residential properties will influence detailed-design decisions; • Ensure that permanent rights are limited to the minimum reasonably necessary; • Ensure that reasonable future development is appropriately protected; • Ensure that any future consent regime contains clear and objective criteria; • Provide for appropriate resolution of disputes concerning future development; • Consider whether additional requirements or protective provisions should be incorporated within the dco; • Ensure that detailed design includes meaningful engagement with affected landowners before the final tunnel alignment is fixed; and	The Applicant acknowledges the summary point made by the respondent.

Reference	Theme	Issue raised	The Applicant's response
		• Require the applicant to demonstrate why any permanent interference with my particular residential property cannot reasonably be avoided. I would ask that the compulsory acquisition, alignment and future-development issues affecting my property remain specifically identified for consideration during the Examination. If my property is confirmed as land over which compulsory acquisition or acquisition of rights is sought, I reserve my right as an affected landowner to request and participate in a Compulsory Acquisition Hearing in accordance with the Examination timetable. Nothing in this representation should be interpreted as agreement in principle to the acquisition of any subsoil or other rights beneath or over my property, nor as acceptance of the Applicant's proposed compensation arrangements. I also reserve the right to provide further written representations and supporting evidence once the Applicant supplies more detailed information concerning the alignment, land rights and protection zones affecting my property.	
RR-030-017	Consultation	AI disclosure Artificial intelligence was used to assist with organising and drafting this representation based upon the facts, correspondence, documentation and concerns supplied by me. I have personally reviewed the completed representation and confirm that it accurately reflects my own circumstances, intentions, concerns and views. No AI-generated factual or technical evidence is relied upon as independent evidence.	The Applicant has noted this comment.

Table 2-4 The Applicant's response to RR-039 from tor&co on behalf of Bloor Homes Limited

Reference	Theme	Issue raised	The Applicant's response
RR-039-1	Greeting	1. Introduction Bloor Homes Limited (Bloor) has interests in two adjoining parcels of land at Mill Lane, Wickham. The southern parcel is allocated for residential development under Policy WK3 of the Winchester District Local Plan 2020 to 2040, while the adjoining northern parcel is being promoted by Bloor for residential development. The northern parcel is directly affected by the proposed Hampshire Water Transfer and Water Recycling Project (the Project).	The Applicant notes this comment. The Project does not intersect the southern parcel which the Applicant notes is allocated for residential development in Winchester City Council's local plan.
RR-039-2	Principle of development	Bloor does not object to the principle of the Project and recognises the strategic need for new water infrastructure. However, it has concerns regarding the proposed works affecting the northern parcel and, in particular, the alignment of the permanent pipeline, the extent of any associated permanent rights or easements, the temporary use of the land for construction	The need for the Project is set out in the Case for the Project (Document reference 5.6, DCO Volume 5, Version 1). The Projects avoids the southern parcel allocated under Policy WK3 in Winchester City Council's adopted local plan for residential development. The

Reference	Theme	Issue raised	The Applicant's response
		compound purposes and the arrangements for access and subsequent reinstatement. Bloor wishes to engage constructively with Southern Water to ensure that the Project can be delivered without unnecessarily prejudicing the future development potential and value of the northern parcel or the coordinated development of Bloor's wider land interests at Mill Lane.	Applicant notes that the respondent is promoting the adjoining northern parcel, to the south of Blind Lane and west of Mill Lane for residential development which is intersected by the Project. However, the Applicant notes that this land is not subject to allocation in Winchester City Council's local plan, adopted earlier in 2026, nor is there a related live or approved planning application on this land. The Applicant has considered the potential for land to become developed and has amended the design of the Project where it intersects with land that is allocated in an adopted or emerging local plan, and where there is a live or approved planning application. In the absence of an allocation or application, the Applicant has reviewed requests for amendments to the pipeline and these have been made only where the amendment would not give rise to deliverability constraints or additional environmental impacts.
RR-039-3	Location of the proposed pipeline routes	2. Permanent pipeline alignment and future development potential The Works Plans, including Sheet 15 of 30 (drawing reference 710166-SWS-XX-XX-DR-Z-08115), identify the proposed pipeline and associated Order Limits crossing the northern part of Bloor's land. Bloor has interests in two adjoining parcels of land at Mill Lane. The southern parcel is allocated for residential development under Policy WK3, titled Mill Lane, of the Winchester District Local Plan 2020 to 2040, for approximately 40 dwellings. The adjoining northern parcel is being promoted by Bloor for residential development and is the area directly affected by the proposed pipeline and associated Order Limits. Bloor's emerging concept masterplan considers the coordinated development of the two parcels for approximately 100 dwellings in total, comprising approximately 40 dwellings within the WK3 allocation and a further approximately 60 dwellings within the northern parcel. The two parcels therefore form part of Bloor's wider development interests at Mill Lane and have the potential to be planned and developed in a coordinated manner. The proposed pipeline alignment, together with any associated permanent easement, access or maintenance requirements and restrictions on development, therefore, has the potential to constrain the future layout and efficient development of the northern parcel and prejudice the coordinated development of Bloor's wider land interests at Mill Lane. Bloor considers that this impact should be avoided or reduced as far as reasonably practicable. In particular, Bloor requests that Southern Water investigates whether the pipeline can be moved further west towards the edge of the northern parcel, where technically feasible, thereby reducing its interaction with the potential developable area. This request is consistent with Southern Water's own approach to route selection. Paragraph 5.3.12 of Southern Water's Planning Policy Statement submitted as part of the DCO application (Application Document Reference 5.5) explains that the evolution of the Project has considered a range of	The Applicant has considered the request for the Pipeline to be moved further west, to the edge of the field south of Blind Land and west of Mill Lane. However this request would move the pipeline construction directly adjacent to an existing residential property on Blind Lane. As well as this, there would be potential for additional vegetation loss, as the pipeline route is currently sited to utilise an existing gap in the vegetation to the north and south of Blind Lane. See RR-039-2 which explains the Applicant's position on the unallocated land which the respondent refers to as the northern parcel.

Reference	Theme	Issue raised	The Applicant's response
		technical, environmental, planning, social and economic criteria in determining the location of the Project and the pipeline route, including through the identification and testing of alternatives and engagement with stakeholders. The Planning Policy Statement also expressly recognises at paragraph 7.49 that the Project has the potential to interfere with sites allocated for development. That consideration is particularly relevant in this location given that Bloor's interests comprise both the allocated WK3 parcel immediately to the south and the adjoining northern parcel being promoted for residential development and directly affected by the Project. Bloor therefore considers that the relationship between these two parcels, and the potential for their coordinated development, should be taken into account when assessing the proposed pipeline alignment and whether a less harmful reasonably practicable route can be achieved. Bloor requests early engagement with Southern Water regarding the alignment through its land interest and an explanation of the alternatives considered at this location, including whether an alignment further west could be achieved without materially affecting the delivery of the Project. Bloor intends to provide further information regarding its development interests and emerging residential proposals during the Examination if required.	
RR-039-4	Landowner engagement	3. Permanent rights and easements Bloor is also concerned about the nature and extent of the permanent rights proposed to be acquired over the land in association with the pipeline. The implications for future development will depend not only upon the physical location of the pipeline itself but also upon the width and nature of any easement, access requirements and restrictions imposed upon development within or adjacent to the pipeline corridor. Bloor therefore requests that any permanent rights sought over the northern parcel are limited to those demonstrably necessary for the construction, operation and maintenance of the Project and are framed so as to minimise interference with its future development. The landowner reserves its position in relation to the compulsory acquisition of land or rights and any compensation arising from the effect of the Project upon the development potential and value of the land.	The purpose of the easement is to protect the integrity and operational requirements of the pipeline and to ensure appropriate access for inspection, maintenance, repair and replacement activities. The required width has been determined following a detailed technical assessment, taking account of the pipeline's diameter, depth, construction methodology, location and operational function. For sections of pipeline installed using open-cut construction, the Applicant is seeking an easement width of 11m (5.5m either side of the pipeline). This reflects the access and operational requirements associated with maintaining and, if necessary, excavating the pipeline in the future. Notably, this represents a reduction from the Applicant's published stand-off guidance for water mains of a comparable size and depth [1], which would typically require a wider protected corridor. This justification was issued to the Land Agent Group and therefore the owner of land of which the respondent has rights on 27 July 2026. As detailed within the Statement of Reasons [APP-025], temporary use powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to construct, operate and maintain the project. The rights and restrictive covenants to be acquired are set out in Schedule 5 to the draft DCO [APP-023].

Reference	Theme	Issue raised	The Applicant's response
			The pipeline in this land would be constructed using trenched open-cut methodology with an anticipated 40m working width as set out in 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082].
RR-039-5	Construction compound locations	4. Temporary construction compound H-2 The application proposes temporary construction compound H-2 within the northern parcel. The Framework Construction Traffic Management Plan submitted with the DCO application (Framework CTMP, Application Document Reference 7.2) identifies H-2 as a sectional site compound accessed from Blind Lane. Table 5-17 of the Framework CTMP identifies an indicative duration of approximately 10 months for works associated with H-2. The Blind Lane temporary access serving compounds H-1 to H-3 is identified as being required for approximately 17 months. Bloor does not object in principle to the temporary use of the land where this is reasonably necessary to facilitate construction of the Project. However, given the residential promotion of the northern parcel, it is important that the temporary occupation, construction activities and subsequent reinstatement do not unnecessarily prejudice its future development. Bloor therefore requests appropriate safeguards regarding the extent and duration of temporary possession and the condition in which the land is returned following completion of the works.	The proposed construction compound H-2 to the south of Blind Lane would be temporary, and the land would be reinstated following completion of construction works in this location. No permanent works would be retained in the area shown exclusively as Work No. 6 on the Works Plans – 2 of 3 documents [AS-008] in this location. Sheet 15 of the Lands Plans – 2 of 3 documents [AS-005] reflects that only temporary rights are sought in this location. As detailed in the Framework Construction Traffic Management Plan (CTMP) [APP-415] potential widening works are being explored at the Blind Lane entry to the junction with Winchester Road and Titchfield Lane. These works would be required on a temporary basis, however Hampshire County Council have confirmed in a meeting dated 6 October 2026 that they would seek for these widening works to be retained, thus permanently improving access on to Blind Lane for larger vehicles. This would therefore improve access to a future housing development for both construction and larger operational vehicles (e.g. refuse collection vehicles).
RR-039-6	Traffic and transport	5. Blind Lane access The Framework CTMP proposes a temporary site access from Blind Lane serving construction compounds H-1, H-2 and H-3. Paragraph 5.6.72 identifies the access general arrangement at Appendix D, drawing reference 710166-STA-GEN-XX-DR-CH-00009. Southern Water has undertaken design work in relation to this access, including vehicle tracking using a 16.5 metre HGV, and has considered alterations to the local highway arrangements to facilitate construction traffic. Bloor recognises that these assessments have been undertaken for the particular purpose and traffic characteristics of the Project. The location of the proposed access is potentially relevant to the future promotion of the land. It could potentially provide an opportunity for a secondary or emergency access serving future residential development, subject to separate technical assessment and the necessary highway approvals. Bloor therefore requests that the detailed design, construction and subsequent reinstatement of the temporary access are undertaken in a manner which does not unnecessarily prejudice the potential for an access at this location to be retained or utilised in connection with the future development of the northern parcel.	The Applicant acknowledges the importance of ensuring that temporary works are designed and carried out in a manner which does not affect the delivery of future infrastructure. Works within the highway will be carried out in accordance with Schedule 3 to the draft DCO [APP-023]. The draft DCO [APP-023] provides provisions for the protection of the local highway authorities at Part 4 of Schedule 10. These protective provisions mean that all works, including temporary access works, will be carried out with the prior approval of the local highway authority. The Applicant is aware that Bloor Homes have an Option to Purchase land impacted by the Project and have identified them as a Category 2 interest within the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1). Since January 2024 the Applicant has sought to engage with the respondent on the Project. The Applicant would welcome the opportunity to engage and wrote to the respondent on 9 September 2026 offering a meeting to discuss the points raised in the representation.

Reference	Theme	Issue raised	The Applicant's response
		Bloor would welcome engagement with Southern Water regarding the detailed design of the access and its proposed treatment following completion of the construction works.	
RR-039-7	Landowner engagement	6. Reinstatement Bloor requests that the land temporarily occupied for construction purposes is reinstated following completion of the works to an appropriate standard and in a manner which does not prejudice its future development potential. The reinstatement arrangements should therefore take account of the known residential promotion of the northern parcel, rather than proceeding on the assumption that the land will necessarily remain in its existing use indefinitely. In particular, Bloor wishes to ensure that temporary construction works, changes in levels, drainage, soil handling, landscaping, access works or other reinstatement measures do not introduce unnecessary physical or legal constraints which could subsequently impede the development of the land. As noted above, Bloor does not presently seek the automatic removal of the Blind Lane access following construction. Its future treatment should instead be discussed with Bloor having regard to the potential relevance of this access to the future development of the northern parcel.	Land will be restored to its original condition following the installation of the pipeline in accordance with the Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) as secured by Schedule 2 of the Draft DCO [APP-023] and which will be developed further into a detailed SRMP prior to commencement of construction. The Applicant notes the respondent's comment regarding considering future use of the land when undertaking reinstatement, however no planning application has been made at this site, and the site is not allocated for development in Winchester City Council's adopted or emerging location plan. Therefore, it would not be reasonable for the reinstatement requirements of the Project to be impacted when there is no certainty that a development will come forward in this location. The temporary construction access from Blind Lane is proposed to be temporary and vegetation would be reinstated following completion of construction works in this location. Notwithstanding this, the Applicant appreciates the respondent's wish to engage further on this point and most recently met with the respondent on the 29 September 2026 to discuss their feedback further.
RR-039-8	Landowner engagement	7. Matters Bloor seeks to resolve Bloor wishes to engage constructively with Southern Water before and during the Examination and considers that the following matters should be addressed: - whether the permanent pipeline alignment through the northern parcel can be moved further west, where technically feasible, to reduce its impact upon the future developable area; - the justification for the current pipeline alignment and the alternatives considered at this location; - the extent and nature of the permanent rights, easements and restrictions sought over the northern parcel and how these can be minimised to avoid unnecessary interference with future residential development; - appropriate controls over the extent and duration of temporary possession associated with compound H-2 and the related construction works; - appropriate reinstatement provisions which recognise the future development potential of the northern parcel; and - the detailed design and subsequent treatment of the Blind Lane access so that the Project does not unnecessarily prejudice the opportunity for an	The Applicant acknowledges and appreciates the respondent's wish to engage constructively on the matters set out within this relevant representation. The Applicant and most recently met with the respondent on the 29 September 2026 to discuss their feedback further.

Reference	Theme	Issue raised	The Applicant's response
		access at this location to contribute to the future development of the northern parcel. Bloor reserves its position in relation to these matters, including the compulsory acquisition and temporary possession powers sought through the DCO and any compensation arising from the impact of the Project upon the land. Bloor intends to participate in the Examination as necessary and may make further submissions as the above matters are developed and following further engagement with Southern Water.	

Table 2-5 The Applicant's response to RR-041 from Brian James Oswald on behalf of Brian and Heather Oswald

Reference	Theme	Issue raised	The Applicant's response
RR-041-1	Location of the proposed pipeline routes	We support the general aims of the Project, but have concerns about the potential impact of the proposed pipeline (construction and ongoing), which will pass within 50 metres of our house, and cross (redacted) which is our only vehicle access.	The Applicant has noted this comment. The pipeline route has been selected by undertaking an extensive route selection process which is set out in the Scheme Development Report [APP-073 to APP-075]. Consideration of access and noise during the construction phase are addressed below. Following completion of construction, the land would be reinstated to its existing condition. The pipeline would be located within the Work No. 4(a) area as shown on Sheet 13 of the Works Plans [AS-008]. The final location of the pipeline would be determined at the detailed design stage following approval of the DCO application. **Traffic** To construct the temporary accesses as well as the Pipeline between the WRP site and Otterbourne WSW, road closures would be required on Castle Farm Lane. Temporary closures would be required for likely three weeks, up to a maximum of nine weeks. As detailed in the Traffic Management Strategy [APP-416], where temporary road closures would restrict access to properties, specific measures will be implemented to ensure that residents can continue to access their properties. These measures will include mitigation such as temporary places to provide vehicular access, or the creation of temporary tracks for out of hours access. An out of hours communication line will also be provided to ensure that residents have a point of contact should any issues arise. **Noise** The construction and operational phase noise and vibration impacts of the project have been assessed, as reported in ES Chapter 15 Noise and vibration [APP-094]. With reference to the construction noise and vibration assessment, as set out in ES Appendix 15.1 Construction noise and vibration assessment [APP-179], this dwelling (R83) will be mainly affected by construction noise

Reference	Theme	Issue raised	The Applicant's response
			associated with the short-term works (<4-weeks), associated with the 'Pipeline -Construction' and 'Road Crossings' stages. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3 states "The *Contractor will prepare a Noise and Vibration Management Plan (NVMP) which will form part of, or be appended to, the detailed CEMP(s)".* Environmental measure NV1 identifies the proposed content of the NVMP, NV2 identifies the standard mitigation measures which will be included in each NVMP and NV3 identifies a range of additional mitigation measures that could be included where required to reduce exceedances of the Lowest Observed Adverse Effect Level (LOAEL) and avoid likely significant adverse effects where relevant and practicable. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1) for document 1 of 3 also states that: "A noise and vibration monitoring protocol including a schedule *of noise and vibration monitoring locations and stages during construction of the Project when monitoring will be undertaken. To include physical and observational checks/audits at locations to be determined in consultation with relevant local planning authorities. Locations selected shall be determined by the works being undertaken (and level of anticipated noise) and the sensitivity of receptor and will be informed by further calculations once detailed design and construction planning is complete"* Consequently, no significant construction noise or vibration impacts/effects would result.
RR-041-2	Landowner engagement	We have sent more detailed feedback and comment to Southern Water's agents, Dalcour Maclaren.	The Applicant confirms receipt of this feedback and has engaged with the respondent directly. In addition, the respondent's feedback has been addressed within Appendix G – Statutory Spring 2025 Consultation [APP-050] under issue code TTR209.

Table 2-6 The Applicant's response to RR-042 from Buckland Development Limited (as Welborne's master developer)

Reference	Theme	Issue raised	The Applicant's response
RR-042-1	Landowner engagement	The proposed development will have unacceptable impacts on the operation of Buckland Development that have not been fully considered by the Applicant. This includes planned development in respect of Welborne. Further details can be found in our representations to follow today.	The Applicant notes this comment. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken extensive engagement with landowners and considered all feedback provided throughout statutory and non-statutory consultation. The Scheme Development Report [APP-073 to APP-075] sets out the process that was undertaken to select the pipeline routes, construction compounds and AGP sites. Sections 5.6.4 to 5.6.13 of the Scheme Development Report [APP-073 to APP-075] set out that an alternative route for the pipeline was progressed in order to reduce the Project's interface with residential areas of

Reference	Theme	Issue raised	The Applicant's response
			the Welborne Garden Village. This alteration was made following the Summer 2022 Consultation. Sections 5.12.14 and 5.12.15 of the Scheme Development Report [APP-073 to APP-075] explain that Intermediate Pumping Station F (IPS-F) was sited to avoid land that the Welborne Garden Village had identified for the development of allotments and recreational land at the north of the zone, and avoided most of the existing overhead power line that is located at the centre of the zone. The location for IPS-F (Work No. 5A) has been selected due to the reduced environmental impact and the ability to integrate the site into the existing and future landscape. The Scheme Development Report [APP-073 to APP-075] explains the process that was undertaken to select the location of IPS-F. IPS-F has been sited to avoid Welborne Garden Village land identified for allotments/recreation and avoid overhead power lines. It was identified to benefit from existing access and natural screening from an adjacent copse of trees and was considered to be less visually prominent in this location. The Design Principles for IPS-F (see the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) include proposals for woodland and scrub planting and hedgerow enhancement. These proposals will help to provide visual screening for future residents of Welborne Garden Village, integrate IPS-F within the landscape and improve habitat connectivity for example. The Applicant has provided flexibility for the construction and operational access to IPS-F, as shown on Sheet 12 of the Works Plans – 2 of 3 documents [AS-008], so that these access proposals can be developed alongside the design of Welborne Garden Village, as it comes forward. As detailed further in RR-042-15, the Applicant considers that a sustained programme of engagement has been undertaken with the respondent regarding the Project. Finally, the Applicant also prepared a technical note which was issued to the respondent's representatives on the 15th May 2026, which detailed the scheme development process undertaken for IPS-F which considered the impacts on Welborne Garden Village and responded to alternative sites proposed by the respondent. As part of this technical note, the Applicant considered two alternative sites suggested by the respondent. The first was directly east of Forest Lane and west of Carpenters Copse. This site was not practicable due to the interface with various utilities that are being developed as part of Welborne Garden Village and the Applicant's proposed pipeline. The second alternative was directly east of Chalk Lane. This site was also not practicable as it would be located within the Welborne Garden Village site, potentially giving rise to conflicts in the development of both projects. The Applicant also signposted the respondent's land agent to relevant DCO documents and design plans submitted as part of the DCO application on the 18 August 2026.

Reference	Theme	Issue raised	The Applicant's response
RR-042-2	Landowner engagement	1. Introduction 1.1 We act for Welborne Land Limited (Company Registration Number 10786908), whose registered office is located at 20 Jewry Street, Winchester, SO23 8RZ ("WLL") and Buckland Development Limited (CRN 06030455) whose registered office is located at 20 Jewry Street, Winchester, Hampshire, SO23 8RZ ("Buckland") (together our "Client"). 1.2 WLL is the freehold owner and Buckland is the master developer of the Welborne Development Site, Fareham, Hampshire and registered under various titles at HM Land Registry. The titles relevant to this Relevant Representations are registered under title numbers HP847889 and HP847890 (the 'Site'). Copies of the registered title plans for these two titles are attached at Annexure 1.	The Applicant notes this comment.
RR-042-3	Cumulative effects	1.3 The Site has outline planning permission granted in 2021 for a major development site consisting of, among other things, up to 6,000 homes, a village centre, employment floorspace, four schools, and green infrastructure (ref P/17/0266/OA) (the 'Welborne Garden Village'). The outline planning permission has subsequently been subject to a series of S96a application (non-material amendments). In relation to that: 1.3.1 The approved Site Plan and Parameter Plans for the Welborne Garden Village are attached at Annexure 2. 1.3.2 The approved Strategic Design Code for the Welborne Garden Village, which sets out the site-wide design principles, as well as more detailed requirements for each neighbourhood, is attached at Annexure 3. The Examining Authority is asked to note the location of the Albany Neighbourhood (one of ten neighbourhoods in the Welborne Garden Village development), which is set out in more detail on p. 70 of the Strategic Design Code. 1.3.3 A Sequencing Plan, taken from the Welborne Infrastructure Delivery Plan (prepared by Buckland Development Limited as the master developer of the Welborne Development) dated March 2019, and approved as part of the outline planning permission is attached at Annexure 4. 1.3.4 The illustrative Biodiversity Priority Area Plan, taken from the Biodiversity Enhancement Strategy (BES) (prepared by Holbury Consultancy Services - September 2020) is attached at Annexure 5. 1.3.5 The BES Jigsaw Plan for the most recently submitted reserved matters application P/26/0876/RM, demonstrating the onsite enhancements at the time of submission, is also attached at Annexure 6. 1.3.6 It should also be noted that Welborne Garden Village is well progressed in its delivery, and to date circa 120 planning and reserved matters applications have been submitted to Fareham Borough Council for approval. The first residential parcels are nearing completion, with occupations on site, and substantial areas of green, grey and blue infrastructure have been delivered.	The Applicant acknowledges the list of documentation provided by Buckland Development Limited with respect to the Welborne development, and where appropriate has taken these into account in the design of the Project. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken extensive engagement with landowners and considered all feedback provided throughout statutory and non-statutory consultation. The Scheme Development Report [APP-073 to APP-075 – 3 documents] sets out the process that was undertaken to select the pipeline routes, construction compounds and AGP sites.

Reference	Theme	Issue raised	The Applicant's response
RR-042-4	Cumulative effects	1.4 In addition to the approval of the outline planning permission, a separate detailed planning application for a primary substation, electricity pylon undergrounding and a district heat network to the north east of the site have been approved (ref: 23/01722/FUL and P/23/1004/FP). A subsequent S96a application (ref: P/23/1004/MA/A) and S73 application (ref: P/25/0645/VC) have made amendments to the original scheme, which has since begun implementation. A plan of that site is attached at Annexure 7. This was subject to mandatory BNG requirements.	The Project and the identified infrastructure and utilities required for Welborne Garden Village have a spatial overlap in this location. This Applicant is aware of these and has considered their location in designing the Project. With respect to the land identified to specifically deliver the biodiversity net gain (BNG) requirements within 23/01722/FUL, P/23/1004/FP, P/23/1004/MA/A and P/25/0645/VC, there is no spatial overlap with the Project. The Applicant will continue engagement with the Respondent to ensure the projects can be delivered in line with their requirements.
RR-042-5	Landowner engagement	1.5 Approximately 11 Land Plots for compulsory acquisition, as set out in the Book of Reference (APP-027), acquire rights over or interests in the Site. For those plots, WLL is therefore a category 1 person as set out in s. 57 Planning Act 2008. Buckland is also an interested party as the master developer of the Welborne Development. Mark Thistlethwayte ("MT") is currently in occupation of the land plots identified in the Schedule attached at Annexure 8 as being owned by Our Client as MT is farming the land.	The Applicant notes this comment.
RR-042-6	Landowner engagement	1.6 The precise plots are set out in the Schedule at Annexure 8 to this Relevant Representation (the 'Schedule'). Please note that the land plots identified are based on a review of the various Land Plans against the registered title plan to the Site. As such, it is possible that there may be discrepancies as we have not carried out any Land Registry SIM searches to verify the position. It is therefore possible that additional land plots may be identified as part of our more detailed review of the Application.	The Applicant has undertaken diligent inquiry to obtain the details of persons with an interest in the Order Limits, as summarised in the Consultation Report [APP-029] Section 9.3.17 to 9.3.30. As part of this process, Land Interest Questionnaires (LIQs) were issued to the respondent ahead of the Summer 2024 Consultation to assist the respondent in identifying themselves, confirming contact details, and clarifying land ownership, occupation, tenancy arrangements and any other interests in land, including rights of way and option agreements. The LIQs also sought to confirm that land ownership and occupation boundaries were correctly identified. The Applicant received a response from the respondent in February 2024 confirming an interest the Applicant had identified and the Applicant incorporated the information into the diligent inquiry process. The Applicant then issued the respondent a Confirmation Schedule in October 2025, which summarised the Applicant's understanding of the respondent's interest in land relevant to the Project. The Applicant sought a response to confirm whether the information held was correct, however no response was provided despite a further reminder letter being issued in December 2025. The Applicant has since had further engagement with the respondent's land agent throughout September 2026 regarding their land interests and is now undertaking a review of their interests within the Order Limits. The Applicant is in the process of checking and verifying the information with the respondent and will update the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1) accordingly with any necessary amendments.
RR-042-7	Landowner engagement	1.7 The Site adjoins and is connected with, but is in separate ownership to, additional land also affected by the DCO. In particular, the parcels owned by the Southwick Estate (Interested Person Registration Number F096A935C) and the Roche Court Estate - Interested Person Registration Number	The Applicant notes this comment and is committed to working collaboratively with landowners to address concerns and agree practical solutions wherever practicable. The Applicant confirms that further engagement is also being undertaken with the Southwick Estate and the Roche Court Estate and the

Reference	Theme	Issue raised	The Applicant's response
		F4D5746DB (in separate but connected ownership). Our Client anticipates they will be impacted by works carried out on land adjoining or near to the Site. For example, the precise routes of services or other easements serving the Site and the Welborne Garden Village will not always be documented on the registered titles (or known to our Client) and the Site is likely to be impacted in the long term by the proposed use of land Plots 11-019, 11-015 and 11014 (which is in separate legal ownership). Further details will be provided in due course.	Applicant most recently attended a site meeting on the 10 November 2026 with all parties to discuss the respondent's concerns on the interfaces between adjoining ownerships. The Applicant has undertaken diligent enquiry via land referencing and utility searches to identify services owned by statutory undertakers within the Order Limits and is engaging with such statutory undertakers. The Book of Reference (Document reference 4.3, DCO Volume 4, Version 1) contains the details of statutory undertakers with services in or under the Order Limits whose rights may be affected by the Project. As detailed in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) the data on the locations of utilities will be refreshed at reasonable appropriate points during the design and construction of the Project to provide relevant information to plan, manage, monitor and co-ordinate health and safety in the construction phase. The risk of damage to utilities will be managed through the Contractor's Permit to Dig which will include details for avoidance of utilities and an emergency response which will be employed should a utility be damaged. The Applicant is also engaging with the respondent to discuss potential interfaces with utilities and infrastructure. Further information was recently sent to the respondent's project manager on the 18 September 2026 to progress discussions regarding the infrastructure and utilities network being constructed.
RR-042-8	Landowner engagement	1.8 Our Client will also be classified as Category 2, Category 3 and Part 3 persons in respect of land plot numbers neighbouring the Site. In addition to Land Plots 11-019, 11-015 and 11-014, referred to at para. 1.5, we expect that our Client will also be interested persons for Land Plots 12-004, 11-020, 11-023, 11-013, 12-010.	Please see response to RR-042-6 regarding the Applicant's engagement with the respondent on their land interests.
RR-042-9	Landowner engagement	1.9 These representations focus on identifying the impacts arising where our client is a Category 1 Person.	The Applicant notes this comment.
RR-042-10	Principle of development	1.10 Our Client objects to the application, for the reasons set out below.	The Applicant acknowledges this position.
RR-042-11	Landowner engagement	2. Book of Reference inaccuracies 2.1 The Book of Reference sets out over approximately one plot of land Our Client has Category 1 Person interests in (11-022) and a further three where we expect that they will have Category 2 Person interests in (11-019, 11-015 and 11-014 as these plots are immediately adjoining the Site and in some cases it appears that the plot may partly fall within our Client's ownership), in relation to which the Applicant is seeking compulsory acquisition powers. Based on the information provided in the Applicant's submitted Book of	Please see response to RR-042-6 regarding the Applicant's engagement with the respondent on their land interests. The Applicant has since had further engagement with the respondent's land agent throughout September 2026 regarding their land interests and is now undertaking a review of their interests within the Order Limits. The Applicant is in the process of checking and verifying the information with the respondent and will update the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1) accordingly with any necessary amendments.

Reference	Theme	Issue raised	The Applicant's response
		Reference, a large number of compulsory acquisition powers will affect Our Client's freehold interests, equitable interests easements and other rights.	
RR-042-12	Landowner engagement	2.2 The plots of land that Our Client has an interest in is shown on Land Plans numbers 6 to 11 and 12 of 30, as set out in APP-010.	Please see response to RR-042-6 regarding the Applicant's engagement with the respondent on their land interests.
RR-042-13	Landowner engagement	2.3 We have reviewed the Book of Reference and the Land Plans, solely for the purpose of determining the land plots that the Applicant believes Our Client has an interest in as listed here. This review has not involved a technical overlay of plans nor full title referencing.	This comment is noted. Please see response to RR-042-6 regarding the Applicant's engagement with the respondent on their land interests.
RR-042-14	Landowner engagement	2.4 Nevertheless, we understand that the information in the Book of Reference relating to Our Client's interests is not fully accurate and we are therefore undertaking our own land referencing exercise to confirm this information. Given the guidance on drafting relevant representations indicates names should not be used, we will provide updated information to the Applicant in the first instance, and to the Examining Authority if required.	Please see response to RR-042-6 regarding the Applicant's engagement with the respondent on their land interests.
RR-042-15	Landowner engagement	3. Negotiations to avoid compulsory acquisition before the application for compulsory purchase powers 3.1 Our Client is keen to reach a private agreement with the Applicant relating to the impacts of the Application. However, Our Client considers there has not been meaningful engagement, and that although there have been meetings and correspondence this has felt like a box ticking exercise, with no meaningful consideration of the impacts on the Welborne Garden Village or alternatives proffered which would have less impact.	The Applicant is committed to working collaboratively with landowners and it remains the Applicant's firm preference to reach a voluntary agreement for the acquisition of land and rights where possible. As detailed within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken extensive attempts to meaningfully engage with landowners on voluntary agreements and has continued to have productive discussions with them either directly or through their professional representatives. In February 2025 a number of the professional representatives, including the respondent's land agent, formed a Land Agent Group to collectively consider and progress discussions on Heads of Terms for voluntary agreements to ensure that all land agents representing landowners impacted by the project were represented equally, regardless of land holding or perceived impact. The Applicant issued Heads of Terms to the Land Agent Group on 3 February 2025 to provide them an opportunity to review the proposals and gather comments ahead of the first meeting between the Land Agent Group and the Applicant. The Land Agent Group provided their initial comments on the Heads of Terms on 24 February 2025. Following this, the Applicant undertook a multidisciplinary review of the comments made. In addition to this, several points were also referred to external consultants to ensure a comprehensive review was completed and that the terms were aligned with what was being sought in the DCO application. The Applicant responded to the Land Agent Group on 5th August 2025 with further updates to the Heads of Terms. The first Agent Group meeting was held on 10 September 2025 where the Applicant and the Land Agent Group reviewed and discussed comments on the Heads of Terms. There was a second meeting on 23 January 2026 to

Reference	Theme	Issue raised	The Applicant's response
			discuss further feedback from the Land Agent Group, after which the Applicant issued the final template for the Heads of Terms on 26 February 2026. Following this, the Applicant commenced issuing Heads of Terms to landowners on 6 March 2026. The Applicant then reviewed further feedback received in June 2026 from the Land Agent Group on both the terms and commercial offer. A third Land Agent Group meeting was held to discuss these points further on the 14 July 2026. Based on this feedback the Applicant wrote to all landowners on the 7 August 2026 with an improved commercial offer and amended terms to address further points from the Land Agent Group. The Applicant met with the respondent on the 10 November 2026 where progress was made on the Heads of Terms. The Applicant considers that this sustained programme of engagement and negotiation demonstrates that significant efforts have been made to secure voluntary agreements prior to, and alongside, the compulsory acquisition process. Finally, the Applicant also prepared a technical note which was issued to the respondent's representatives on the 15 May 2026, which detailed the scheme development process undertaken for Intermediate Pumping Station F which considered the impacts on Welborne Garden Village and responded to alternative sites proposed by the respondent. As part of this technical note, the Applicant considered two alternative sites suggested by the respondent. The first was directly east of Forest Lane and west of Carpenters Copse. This site was not practicable due to the interface with various utilities that are being developed as part of Welborne Garden Village and the Applicant's proposed pipeline. The second alternative was directly east of Chalk Lane. This site was also not practicable as it would be located within the Welborne Garden Village site, potentially giving rise to conflicts in the development of both projects. Please see RR-042-1 for further details of how the Applicant has considered the Welborne Garden Village. The Applicant remains willing to discuss voluntary agreements and is continuing to engage with the respondent's land agent regarding their feedback and comments on the Heads of Terms, most recently on 10 November 2026. The Applicant aims to work collaboratively with landowners to address concerns and agree practical solutions wherever practicable.
RR-042-16	Location of AGP	4. Impacts on the Welborne Development 4.1 The Schedule attached at Annexure 8 sets out, in detail and plot by plot, the negative impacts of the Application on the Welborne Garden Village if granted. In broad terms, those are: 4.1.1 The proposed location of pumping station F and the access road required by the Applicant which will be directly adjacent to the Albany neighbourhood and impacts the access to the housing parcel. The pumping station will result in noise pollution, traffic routing and visual impact for housing	The location for Intermediate Pumping Station F (IPS-F) (Work No. 5A) has been selected due to the reduced environmental impact and the ability to integrate the site into the existing and future landscape. The Scheme Development Report [APP-073 to APP-075] explains the process that was undertaken to select the location of IPS-F. IPS-F has been sited to avoid Welborne Garden Village land identified for allotments/recreation and avoid overhead power lines. It was identified to benefit from existing access and natural screening from an adjacent copse of trees and was considered to be less visually prominent in this location. The Design Principles for IPS-F (see

Reference	Theme	Issue raised	The Applicant's response
		that will sit in close proximity to it. There is limited scope for mitigating these impacts. Our Client would need to amend the permission and increase landscape buffers, but the density limitations in the Welborne Garden Village will make it difficult to relocate houses lost from the Albany Neighbourhood.	the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) include proposals for woodland and scrub planting and hedgerow enhancement. These proposals will help integrate IPS-F within the landscape and improve habitat connectivity. The DCO application includes a Framework Construction Traffic Management Plan (CTMP) [APP-415] which sets out the mitigation measures to reduce impacts on the highway network associated with construction traffic. This management plan has been developed in consultation with Hampshire County Council. The operational traffic impacts of IPS-F are assessed in the Transport Assessment (Appendix 18.1 of the ES [APP-186 to APP-188] and concluded to be negligible. The Applicant has provided flexibility for the construction and operational access to IPS-F, as shown on Sheet 12 of the Works Plans – 2 of 3 documents [AS-008], so that these access proposals can be developed alongside the design of Welborne Garden Village, as it comes forward. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) sets out mitigation measures to reduce noise and vibration during construction. Detailed design would also seek to reduce operational noise and vibration as per design principle IPS-F_4 (Document reference 5.11, DCO Volume 5, Version 1)
RR-042-17	Construction compound locations	4.1.2 There are likely to be construction compounds placed within the Site, in an area earmarked for housing. That will delay the housing coming forward.	The Project would be constructed over approximately a five year period, however, a detailed construction programme has not been defined at this stage and will be developed by the Contractor once appointed. ES Chapter 3 Description of the Proposed Development [APP-082] sets out the outline construction programme, which has informed the environmental assessments. The construction programme will be phased and will be determined by the Contractor once appointed. Further engagement with affected parties and landowners would be undertaken ahead of construction.
RR-042-18	Landowner engagement	4.1.3 It also appears that land is to be acquired permanently which is currently set aside to be used for Biodiversity Net Gain and other environmental obligations arising from the Welborne Garden Village. This falls within the current ownership of the proprietors of the Roche Court Estate and is also discussed in their Relevant Representation.	The Relevant Representation submitted by the Roche Court Estate [RR-258] refers to plot 12-012 as being earmarked for Biodiversity Net Gain to satisfy obligations arising from the Welborne Garden Village. The Applicant confirms that compulsory acquisition powers are sought for rights and the creation of new rights (including imposing restrictive covenants) over this plot shown edged black and shaded blue on the Land Plans (Document reference 2.2, DCO Volume 2, Version 2). The Applicant confirms that the rights required in plot 12-012 are for Environmental Mitigation (EMEA-F-2), the requirements of which are summarised in the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). The Applicant is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. The Applicant is also engaging with the developers of Welborne Garden Village to discuss BNG interfaces. Given that plot 12-012 is proposed to be Environmental Mitigation, the Applicant considers that the Welborne Garden Village BNG obligations can co-exist with the Project proposals and

Reference	Theme	Issue raised	The Applicant's response
			the Applicant most recently attended a site meeting on the 10 November 2026 with the respondent to discuss their feedback further. Please see the Applicant's response to RR-042-1 for how the Applicant has considered the Welborne Garden Village.
RR-042-19	Project timescales and programme	4.1.4 In terms of construction, the Welborne construction programme is set out above and at Annexure 4. Notably the Albany neighbourhood will have heat energy and electricity available from 2029, so our Client had anticipated the commencement of construction thereafter. Having reviewed DCO documentation (see APP-094 paragraph 15.8.105 of ES Chapter 15 noise and vibration) it appears that (a) there will be impacts from construction arising on our Clients land in terms of use, noise, vibration etc (b) there may well be an overlap in the time of construction of the DCO project and the Welborne Garden Village and the DCO project will be taking ownership of / rights over plots also required for the construction of the Welborne estate leading to delays in the construction of Welborne and /or (c) the construction and marketing of the Albany neighbourhood will have to be significantly delayed until the DCO works are completed.	The Applicant has noted this comment. Paragraph 15.8.105 of ES Chapter 15 Noise and vibration [APP-094] relates to the operational noise assessment (rather than construction). The operational noise assessment (contained in ES Chapter 15 Noise and vibration [APP-094] and ES Appendix 15.3 Operational noise assessment [APP-181]) reports that at receptor FR2 (representing the closest Welborne Garden Village residential receptor to IPS-F), effects would be permanent minor adverse (not significant) when taking account of the mitigation secured in the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). This requires the appointed Contractor to design AGP to ensure that operational noise levels at Noise and Vibration Sensitive Receptors do not exceed the Lowest Observed Adverse Effects Level (LOAEL). With regard to construction impacts, the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) sets out mitigation measures to reduce noise and vibration during construction. This requires the appointed Contractor to prepare a Noise and Vibration Management Plan which will form part of, or be appended to, the detailed CEMP(s). With mitigation measures in place, residual construction noise and vibration effects would not be significant. The cumulative effects assessment contained in ES Chapter 20 Cumulative and in-combination effects [APP-099] considers effects from the interrelationship between the Project with other developments. This assessment includes consideration of the Welborne development which is presented under ID: FBC ALL021 in ES Appendix 20.2 Cumulative effects assessment [APP-209]. This assessment considers the entire Welborne development and concludes no residual likely significant effects in relation to the cumulative effects between the Project and the Welborne development. The Project would be constructed over approximately a five year period, however, a detailed construction programme has not been defined at this stage and will be developed by the Contractor once appointed. ES Chapter 3 Description of the Proposed Development [APP-082] sets out the outline construction programme, which has informed the environmental assessments. The construction programme will be phased and will be determined by the Contractor once appointed. The Project has been designed to avoid major housing allocation sites for future development, including Welborne Garden Village. Although the Order Limits do include a small area of land within the Welborne Garden Village allocated for a construction compound, there would be no permanent requirement for land within the allocation, except for the provision of

Reference	Theme	Issue raised	The Applicant's response
			permanent access through the development, the location of which is being discussed with the developers. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions. The Applicant has confirmed sufficient resources to meet these obligations as set out in the Funding Statement (Document reference 4.2, DCO Volume 4, Version 1). The Applicant is continuing to engage with the respondent regarding the Welborne Garden Village, and most recently attended a site meeting on the 10 November 2026 with the respondent to progress discussions.
RR-042-20	Landowner engagement	4.1.5 Our Client is an experienced master developer and the blight caused by the DCO means that they will not be able to market the Albany neighbourhood as they are unlikely to find a developer willing to build housing in such close proximity to the DCO scheme. The Welborne Garden Village scheme has enormous upfront infrastructure costs; the Albany neighbourhood is one of the lowest density areas with large dwellings and was anticipated to be one of the most profitable in the overall scheme. This is not simply a matter of compensation to our Client, but a hold up on the delivery of approximately 350 homes.	The Project would be constructed over approximately a five-year period, however a detailed construction programme has not been defined at this stage and will be developed by the Contractor once appointed. ES Chapter 3 Description of the Proposed Development [APP-082] sets out the outline construction programme, which has informed the environmental assessments. The construction programme will be phased and determined by the Contractor once appointed. Further engagement with the respondent will be undertaken ahead of construction, including a review of the phasing of the programme and the impacts on the Welborne Garden Village delivery. The Applicant aims to work collaboratively with landowners to address concerns and agree practical solutions wherever practicable. The Applicant is continuing to engage with the respondent regarding the Welborne Garden Village, and the Applicant most recently attended a site meeting on the 10 November 2026 with the respondent to progress discussions. Please see the Applicant's response in RR-042-22 regarding the delivery of the Albany neighbourhood.
RR-042-21	Construction impacts and effects	4.1.6 The Welborne development required the delivery of works to M27 Junction 10, these are almost complete. These works have severed the access from Pook Lane to the A32. An alternative access to the east has been provided (for use when the River Wallington is in flood 2-4 times a year and the properties between the A32 and the River Wallington are stranded) by improving the farm track from Pook Lane to Albany. This access is a permissive right granted by the Southwick Estate to the Pook Lane Residents, who are tenants of the Estate. It will be interrupted by the DCO works.	The Applicant acknowledges Buckland Development Limited's feedback regarding the permissive access route between Pook Lane and Albany Business Park. The Traffic Management Strategy (TMS) [APP-416] provides a commitment to provide continued access to residents whose access to properties is affected by the construction phase of the Project. Mitigation measures could include temporary plates or temporary tracks for out of hours access. Furthermore, the TMS and Section 6.4 of the Framework CTMP [APP-415] states that an out of hours phone number for residents to contact should access to their property be impacted by construction works will be provided during the construction phase. The Framework Rights of Way Management Plan (RoWMP), Appendix B to the Framework CTMP [APP-415] provides details of Public Rights of Way (PRoW) and permissive paths that are subject to management measures during the construction and operational phase of the Project. Mitigation

Reference	Theme	Issue raised	The Applicant's response
			measures set out within this document are also contained within the Access and PRoW Plan. Sheet 12 of the Access and PRoW Plans [APP-015 and APP-016] and section 6.3 of the Framework RoWMP provides details of proposals for the access track extending east from Albany Business Park. Streetworks are proposed which would upgrade this access track. To the south, the PRoW and permissive path would be temporarily diverted during the construction phase and would be unaffected during the operational phase.
RR-042-22	The draft DCO	4.1.7 The principal issue is that the Albany neighbourhood could come forward at any time from 2029, when our Client's Primary Substation to the north is operational. This part of the Welborne development could be easy to dispose of as it is not interlinked with the rest of the Welborne site. Our Client's concerns are that they cannot market this site whilst the DCO works are in progress. Once completed, there may be impacts and constraints that require layout changes, which could impact on development numbers. The DCO makes no attempt to co-locate their access with our Clients proposed access arrangement for the neighbourhood. Also of concern is the broad wording of the proposed DCO (in the blue area), where the Applicant seeks unspecified rights over the land, this has the potential to hamper our Clients' access and utility provision as well as proposed land uses. Without clarity on what rights the Applicants seek and in which location, our Clients cannot determine the potential impact. 4.1.8 All of that uncertainty is having effects even now, slowing down the design and progression of the Welborne Development (see the N column in the Schedule attached at Annexure 8).	The Applicant does not agree that the Project would prevent the marketing or delivery of the Albany neighbourhood. As set out in the draft DCO [APP-023], the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1) and the Statement of Reasons [APP-025], the rights sought are limited to those reasonably required for the construction, operation and maintenance of the Project and have been minimised where practicable. The Applicant has retained flexibility in the design of the Project, including potential access arrangements to IPS-F, to allow the detailed design of the Albany neighbourhood to come forward in due course. The Applicant does not consider that the Project would give rise to material constraints on the developability of the Albany neighbourhood. The Applicant remains willing to engage with Buckland Development Limited regarding any outstanding concerns.
RR-042-23	The draft DCO	4.2 Our Client remains willing to engage with the Applicants to consider and provide alternatives, both relating to alternative sites for the proposed infrastructure and/or alternative wording for the rights sought under, or requirements of, the draft DCO. It is particularly important that the DCO does not prejudice the Welborne Garden Village, and so protective provisions and/or a clause dealing with potential issues arising from the Hillside line of authority, should be included to ensure that the Welborne Garden Village and all of the benefits it will deliver do not become incapable of implementation.	The Applicant notes this comment and most recently attended a site meeting with Buckland Development Limited on the 10 November 2026 to discuss their feedback further. As explained in the Statement of Reasons [APP-025], ES Chapter 4 Consideration of alternatives [APP-083] and the Scheme Development Report (APP-073 to APP-075), the Applicant has considered alternatives to the Project and to compulsory acquisition, refined the extent of the Order Land through the design process and sought to minimise interference with private interests by acquiring rights rather than freehold interests wherever practicable. The Project has been designed to avoid major housing allocation sites for future development, including Welborne Garden Village. Although the Order Limits do include a small area of land within the Welborne Garden Village allocated for a construction compound, there would be no permanent requirement for land within the allocation, except for the provision of permanent access through the development, the location of which is being discussed with Buckland Development Limited and the landowner. In relation to concerns regarding the decision in *Hillside*, the Applicant does not consider that implementation of the Project would affect the ability to

Reference	Theme	Issue raised	The Applicant's response
			implement the planning permissions comprising Welborne Garden Village. The Applicant has included drafting in Article 49 of the Draft DCO [APP-023] to specifically address this point. Further details can be found in paragraphs 12.19 to 12.23 of the Explanatory Memorandum [APP-024].
RR-042-24	Landowner engagement	Annexure 1 Registered Title Plans for HP847889 and HP847890	The Applicant has had regard to these attachments in responding to this relevant representation.
RR-042-25	The process of developing the Project	Annexure 2 Site Plan and Parameter Plans for the Welborne Garden Village	
RR-042-26	The process of developing the Project	Annexure 3 Strategic Design Code for the Welborne Garden Village	
RR-042-27	The process of developing the Project	Annexure 4 Sequencing Plan, taken from the Welborne Infrastructure Delivery Plan	
RR-042-28	The process of developing the Project	Annexure 5 illustrative Biodiversity Priority Area Plan, taken from the Biodiversity Enhancement Strategy	
RR-042-29	The process of developing the Project	Annexure 6 BES Jigsaw Plan	
RR-042-30	The process of developing the Project	Annexure 7 Site Plan Primary substation 23/01722/FUL and P/23/1004/FP granted by Fareham B	
RR-042-31	The process of developing the Project	Annexure 8 Schedule See references RR-356-1 to RR-356-102	

Table 2-7 The Applicant's response to RR-043 from Carol Ann Jackson

Reference	Theme	Issue raised	The Applicant's response
RR-043-1	Principle of development	I am not supportive of Southern Water HWTWRP's application for a DCO (Development Consent Order) reflecting its usage of the pipeline to pump recycled waste water to Havant Thicket Reservoir highly risking contaminating Havants Spring Water which has been protected over Centurys and should remain so.	The Applicant notes this comment. The recycled water input to Havant Thicket Reservoir will be assessed as part of a water safety plan under the requirements of the Water Supply (Water Quality) Regulations 2016, which is regulated by the Drinking Water Inspectorate, as well as having regulated discharge consents for the Water Recycling Plant (WRP) discharge to Havant Thicket Reservoir and an abstraction licence to withdraw water from Havant Thicket Reservoir from the Environment Agency. The obligations on the Applicant to comply with Environment Agency regulations and the water safety plan will ensure the Applicant's adherence to strict water quality standards. The focus of the Applicant's water quality modelling has been to understand the impact of blending recycled and spring water on water quality and aquatic ecology in Havant Thicket Reservoir, as well as potential water quality effects on downstream water bodies receiving flows from the reservoir (Riders Lane Stream, Hermitage Stream, Langstone Harbour), and the Solent (releases of reject water from the water recycling process from Eastney Long Sea Outfall (LSO)). Outputs from the detailed water quality modelling and assessment of effects are fully reported in the ES Chapter 19 Water environment [APP-098].
RR-043-2	Portsmouth Water proposal	However, I have no issues with the pipeline itself as construction has already been started by Portsmouth Water providing we as our properties are directly within the construction framework.	The Applicant and Portsmouth Water are working closely to deliver their respective projects and will continue to openly share information about their projects and the interfaces between them. Given that the properties referred to are within the construction working area for the Havant Thicket Reservoir project, and the representation is understood to relate to Portsmouth Water's project, the Applicant acknowledges the respondent's lack of objection to the pipeline.
RR-043-3	Landowner engagement	31-July 2026, the Collective Residents of (redacted), Bedhampton, submitted a Request for Information to Southern Water's HWTWRP team, to help us understand the scope of the DCO upon our Properties' boundaries and our Rights; and how that DCO aligned with Portsmouth Water's already-exercised access-rights under The Water Industry Act, Section 159. Southern Water project team's 14-August 2026 response has provided the clarity and reassurance I required; and I have no open question nor concern regarding Southern Water's intended operation of the pipeline. Southern Water's response explained that any "during operational life" access requirement will be managed solely through and undertaken by Portsmouth Water.	The Applicant is pleased that its response dated 14 August 2026 has provided the clarity and reassurance required by the respondent.
RR-043-4	Landowner engagement	Since 15-December 2025, I and Collective Residents of (redacted), Bedhampton have been in dialogue with Portsmouth Water, regarding Portsmouth Water's access-rights upon any of our Properties. Portsmouth Water's recent (1-June 2026) written response, explained: "We have not developed plans for potential works that would involve access via properties on (redacted). This is because it is very unlikely that we will require access, either during construction or operation of the pipelines. Furthermore, if needed,	The Applicant is not party to discussions between the respondent and Portsmouth Water and is therefore unable to respond to this point.

Reference	Theme	Issue raised	The Applicant's response
		the plans would need to be developed in line with the particular circumstances at the time, both in terms of the detail of the work we would need to complete and any needs residents / owners may have at that stage."	

Table 2-8 The Applicant's response to RR-047 from Catesby Estates

Reference	Theme	Issue raised	The Applicant's response
RR-047-1	Landowner engagement	Land at Titchfield Lane, Wickham, Hampshire (Title HP761033) Catesby Estates has been one of the country's leading strategic land promotion companies for over 25 years, and forms part of Urban&Civic, the UK's leading Master Developer. In 2021 both companies were acquired by The Wellcome Trust, which manages around £39.9bn in funds. Catesby currently has around 163 sites in its portfolio and has previously promoted sites for some 61,500 residential units, along with mixed-use and commercial schemes, as part of Wellcome's wider investment portfolio supporting its charitable work.	The Applicant notes this comment.
RR-047-2	Landowner engagement	Catesby, together with the Landowners, have been promoting the Land at Titchfield Lane, Wickham (Title No. HP761033) since 2019 for residential development for around 220 new homes. These representations are submitted jointly with the registered Landowners and we confirm we have a Legal Interest over the land.	The Applicant confirms that the respondent has a Category 2 land interest within the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1).
RR-047-3	Landowner engagement	Southern Water's proposed Hampshire Water Transfer and Water Recycling Project directly affects the Land, involving permanent freehold acquisition, permanent pipeline easements, temporary possession for construction compounds, works required for access, permeant screening of the pumping station, landscaping and environmental mitigation. All of these issues will have a vast, material impact on our proposals for the site.	The rights sought by the Applicant in respect of the Land referred to by the respondent can be found within Schedule 5 to the Draft DCO [APP-023] and shown on Sheet 14 and Sheet 15 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2). The respondent can also find details on the types of works to be undertaken on Sheet 14 and Sheet 15 of the Works Plans [AS-008]. Within discussions with the owner of the Land regarding a voluntary agreement, the Applicant has sought to address the potential impacts to the Land by providing a mechanism for compensating losses associated with any part of the respondent's development that is rendered unimplementable solely due to the existence of the Project. Notwithstanding this, the site selection process as detailed within the Scheme Development Report [APP-073 to APP-075] for the Above Ground Plant (AGP) considered approved or consented residential developments and residential allocations in local authorities' adopted and emerging Local Plans. In many locations, landowners have highlighted to the Applicant that land is being promoted for residential development, however in the absence of an allocation in a Local Plan or a planning application, there is no certainty that the residential development would materialise.

Reference	Theme	Issue raised	The Applicant's response
RR-047-4	Landowner engagement	We would like to stress that we are not against the proposed project in principle, and we do not dispute the need for strategic water infrastructure in the area. Our concerns relate to how much land and how many rights are being sought over HP761033, why this is necessary, and how material engagement with Southern Water throughout the process has been lacking.	The Applicant notes this comment regarding the respondent's position and welcomes that the respondent is not against the principle of the Project. The Applicant confirms that under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors that the Applicant considers demonstrate that the conditions in section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance, have been satisfied. As detailed within the Statement of Reasons [APP-025], temporary possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the Project. The Applicant has sought to engage with the respondent throughout the development of the Project. The Applicant has engaged with the respondent at a site meeting on 17 May 2024 and 21 March 2025 and followed up with correspondence on 11 December 2025, directly responding to the concerns raised at these meetings. In May 2026, the Applicant proposed Heads of Terms to the owner of the land at HP761033 and included provisions to directly address points raised by the respondent. Since issuing the Heads of Terms to the landowner on 7 May 2026, the Applicant has regularly sought meetings since to discuss any site-specific requirements. The Applicant most recently attended a site meeting with the respondent and their representative on the 20 October 2026 to discuss their feedback further.
RR-047-5	Location of the proposed pipeline routes	Catesby's concerns in relation to the project are: • Excessive land being taken;	Intermediate Pumping Station G (Work No. 5B) is proposed in this location, and has been subject to an extensive site selection process, as set out in Sections 5.12 of the Scheme Development Report [APP-073]. The land required for the Intermediate Pumping Station has been determined considering the area required for infrastructure, security requirements and environmental mitigation to reduce adverse impacts. The working width for the Pipeline has been determined considering the size of the pipeline, the trench and the space needed to store and separate material so it can be reinstated properly. Additionally, sufficient space to accommodate construction vehicles and plant is required. The maximum working width for trenched open-cut construction of the Pipeline would be 40m (secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for

Reference	Theme	Issue raised	The Applicant's response
			documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. The Applicant would only exercise the compulsory acquisition and temporary use possession powers over land actually required to deliver the Project. The Project limits and parameters set out in the DCO application provide flexibility for the detailed design to be delivered within these parameters by the Contractor once appointed. This approach ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-047-6	Location of the proposed pipeline routes	• Lack of engagement regarding the positioning of the pipeline route, which we have requested is moved along the northern boundary. In its current positioning, this unnecessarily sterilises a large proportion of the land;	The Applicant considered the request to amend the Pipeline so that it follows the northern boundary of the field. Given the field has an irregularly shaped northern boundary, with residential gardens protruding into the field, it is not practicable to align the Pipeline to the field boundary without introducing a number of right-angled bends in the Pipeline. This would adversely impact the hydraulics of the Pipeline, requiring more energy and potentially additional pumping. As well as this, construction of the Pipeline would become closer to the rear of residential properties, potentially increasing impacts. The Applicant has confirmed that no planning application has been made at this site, and the site is not allocated for residential development in Winchester City Council's adopted or emerging local plan. Therefore, it would not be reasonable for the design of the Project to be impacted when there is no certainty that a development will come forward in this location.
RR-047-7	Location of the proposed pipeline routes	• The width, positioning and restrictions attached to the permanent easements;	The nature of the permanent easements have been carefully defined by the Applicant's technical teams, with the specific purpose of protecting access to and the integrity of the pipelines. The exact location of the permanent restrictions cannot be identified at this stage as the final location of the Pipeline has not been determined. This will be confirmed at the detailed design stage following approval of the DCO application. The purpose of the easement is to protect the integrity and operational requirements of the pipeline and to ensure appropriate access for inspection, maintenance, repair and replacement activities. The required width has been determined following a detailed technical assessment, taking account of the pipeline's diameter, depth, construction methodology, location and operational function. For sections of pipeline installed using open-cut construction, the Applicant is seeking an easement width of 11m (5.5m either side of the pipeline). This reflects the access and operational requirements associated with maintaining and, if necessary, excavating the pipeline in the future. Notably, this represents a reduction from the Applicant's published stand-off guidance for water mains

Reference	Theme	Issue raised	The Applicant's response
			of a comparable size and depth [1], which would typically require a wider protected corridor. This reduction from the normal requirement has been communicated to landowners and their agents where this is being challenged. For sections constructed using trenchless techniques, a reduced easement width is considered appropriate, taking into account depth, construction methodology and location. As the pipeline is installed at greater depth and future maintenance or operational access would be undertaken from either side of the trenchless section rather than directly above it, the same level of restriction is not required. The easement width has therefore been tailored to reflect the differing operational requirements of the construction methodologies. The Applicant is therefore satisfied that the easement widths proposed represent the minimum reasonably required to protect the pipeline and secure its safe operation over its lifetime. This reduction from the normal requirement has been communicated to landowners and their agents where this is being challenged.
RR-047-8	Landscape and visual	• The screening, landscaping, biodiversity and environmental mitigation requirements, which significantly affect our proposals;	The Applicant acknowledges the concern that the screening, landscaping, biodiversity and environmental mitigation requirements associated with the Project may affect potential future development proposals on the Land at Titchfield Lane, Wickham (Title No. HP761033). The Project has been designed to avoid, reduce and mitigate landscape, visual and ecological effects identified through the iterative design process. IPS-G would be situated within the western corner of the landholding, which comprises an arable field. This location is adjacent to existing commercial and industrial land uses immediately to the south, is the furthest part of the field from the edge of the South Downs National Park and provides good opportunities for landscape integration and visual screening. The design incorporates a range of embedded landscape and ecological mitigation measures, including woodland and hedgerow planting, habitat creation and biodiversity enhancement measures. These measures are illustrated within the Indicative Environmental Masterplan appended to the Design Approach Document [APP-077 to APP-079 – 3 documents] and described in the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). The likely landscape and visual effects of the Project are assessed in Environmental Statement (ES) Chapter 13 Landscape and visual [APP-092]. The assessment has been undertaken with reference to the existing baseline conditions and current land use at the time of assessment. The assessment includes viewpoint VP128, located along Footpath 251/1/1 between Titchfield Lane and Winchester Road, which is representative of views experienced by nearby residents and users of the local public right of way network. The assessment concludes that, following implementation of the proposed

Reference	Theme	Issue raised	The Applicant's response
			mitigation measures, landscape and visual effects during operation would not be significant. The landscape, visual and ecological mitigation measures would be secured through the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) and the Outline Landscape and Ecology Management Plan (LEMP) (Document reference 7.5, DCO Volume 7, Version 1) which set out the requirements for the implementation, establishment, management and monitoring of mitigation planting and habitat creation associated with the Project. The Applicant acknowledges that the final design of the Project may impact the respondent's proposed development. As evidenced in the Statement of Reasons [APP-025], the Applicant considers that the land required for the Project has been justified in accordance with the requirements in the Planning Act 2008 and the guidance related to procedures for the compulsory acquisition of land. Although the Applicant is willing to work with the respondent to coordinate proposals and reach a voluntary agreement, the Applicant wishes to highlight that the land being promoted for residential development is not allocated in the local plan or subject to a planning application. On this basis, the Applicant considers it would not be reasonable for the design of the Project to be impacted when there is no certainty the development would materialise. The Applicant remains committed to working collaboratively with landowners and is seeking a meeting with the respondent to discuss these matters further.
RR-047-9	Landowner engagement	• Technical matters need to be properly coordinated to align with the future development of the Land;	The Applicant notes this comment and most recently attended a site meeting with the respondent and their representative on the 20 October 2026 to discuss their feedback further.
RR-047-10	Land quality and ground conditions	• The damage that construction will have on the soil bearing, drainage outfalls and soil contamination;	The likely effects of the Project on soils have been assessed as part of the Environmental Impact Assessment reported within ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1). Construction activities will be undertaken in accordance with the mitigation and management measures secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and other relevant management plans. These measures include minimising soil compaction and damage to soil structure, reinstatement of disturbed areas following completion of relevant works and management of drainage features and outfalls. Specifically, a Construction Drainage Plan will be prepared by the Contractor to manage the quality and quantity of construction stage drainage. The plan will be informed by surveys undertaken by a specialist drainage contractor to locate drains and create pre-construction drawings to ensure appropriate reinstatement.

Reference	Theme	Issue raised	The Applicant's response
			In relation to land contamination, the Applicant has undertaken surveys and assessments to inform the indicative design of the Project. Should previously unidentified contamination be encountered during construction, appropriate investigation, management and remediation measures will be implemented in accordance with relevant legislation and environmental good practice. The Applicant therefore considers that appropriate assessment, mitigation and management measures have been incorporated into the Project to ensure that potential effects on soil resources, drainage infrastructure and contamination risks are appropriately controlled and mitigated.
RR-047-11	Landowner engagement	• Temporary possession for compounds, haul routes and reinstatement after construction;	The detailed design of the Project, including the particulars of land access requirements, will be developed following grant of consent and subject to approval by the relevant authorities. Prior to undertaking detailed design as a post-consent activity, it is not possible to confirm the precise area of land required or the duration of temporary possession. This is consistent with the 'Rochdale Envelope' approach where flexibility is required to address uncertainty that exists prior to the Project being consented. The Applicant is committed to keeping landowners informed as the design evolves and will provide clarity on land use requirements as soon as practicable. Sheet 14 and 15 of the Works Plans – 2 of 3 documents [AS-008] shows the location of construction compounds in this location. The Applicant confirms that commitments relating to reinstatement after construction can be found within Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3).
RR-047-12	Location of the proposed pipeline routes	We have tried to be as pragmatic as possible, rather than simply objecting. Together with our Landowners, we have repeatedly put forward suggestions to help Southern Water deliver the Project while reducing its impact on the Land and our proposals. This includes reducing land take, moving the pipeline further north, repositioning the pumping station, protecting future access and easement rights, and reconsidering how much screening and mitigation land is genuinely needed to facilitate the project.	The Applicant confirms that the respondent's previous comments regarding amending the pipeline route have been considered, as per RR-047-13. The Applicant provided a response to the comments via letter on 11th December 2025. The Applicant has also provided responses to feedback raised by the landowner in Appendix F (Statutory Summer 2024 Consultation) [APP-047] and Appendix G (Statutory Spring 2025 Consultation) [APP-050] to the Consultation Report [APP-029]. As outlined in the Statement of Reasons [APP-025], the Applicant considers that the relevant tests for compulsory acquisition have been met. The Statement of Reasons [APP-025] also details that temporary use powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the Project thus mitigating the extent of the acquisition of land and rights.
RR-047-13	Location of the proposed pipeline routes	The pipeline's position is very concerning to us given the amount of land it would sterilise and become undevelopable. We are yet to receive a true technical explanation as to why the route cannot be moved north, despite this being recorded in Southern Water & Dalcour Maclaren's own meeting minutes	See response to and RR-047-6.

Reference	Theme	Issue raised	The Applicant's response
		in May 2024. This was subsequently raised again in our Landowner's consultation response from July 2024 and we have been consistent with our approach since the projects inception.	
RR-047-14	Landowner engagement	Prior to Southern Water's proposals, we were Promoting a scheme of up to 220 homes. Following the proposals received from Southern Water, a revised layout in 2024 showed that the net developable area decreased and now shows a total of 171 homes. By January 2025, these figures reduced again to 140-160 new homes with Southern Water's scheme in place, against 220245 homes without the reduced site area. The currently proposed, permanent land take is now more extensive than that shown in the earlier proposals, therefore some coordination with Southern Water to establish exactly what impact the final proposals have on the site's development capacity will be required to allow us to make best use of the available land and coordination of accessways, easements and service routes for mutual benefit of all parties.	The Applicant acknowledges that there have been changes to the layout of the Project proposal since 2024. This has been as a result of the survey data obtained, refinement to project requirements and the consultation process over time. Although the respondent has highlighted that the land is being promoted for residential development, in the absence of an allocation in a local plan or a planning application, there is no certainty that the residential development would materialise. This, alongside impacts on protected species, the highway network and historic environment, has fed into route selection for the Project. Notwithstanding the above, the Applicant is open to engaging with the respondent on their latest proposals. The Applicant most recently attended a site meeting with the respondent and their representative on the 20 October 2026 to discuss their feedback further. As stated above and within the Statement of Reasons [APP-025], temporary use powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the Project thus mitigating the extent of the acquisition of land and rights.
RR-047-15	Landowner engagement	Even a small change to where, or how much land is permanently acquired will have a major effect on the future Masterplanning designs, quantum of net developable area, access arrangements to ensure there are no conflicting visibility splays or arrangements and no crossover of utilities servicing both projects. Southern Water should be required to demonstrate that the proposed land take is causing the least impact by configuring a design which is both practicable for their requirements, but also for ours too.	The Applicant has considered the potential for land to become developed and has amended the design of the Project where it intersects with land that is allocated in an adopted or emerging local plan, and where there is a live or approved planning application. The Applicant has confirmed that no planning application has been made at this site, and the site is not allocated for residential development in Winchester City Council's adopted or emerging local plan. Therefore, it would not be reasonable for the design of the Project to be influence when there is no certainty that a development will come forward in this location.
RR-047-16	Landowner engagement	Southern Water is seeking significant Compulsory Purchase Powers over the Land. Before these are granted, we think it is reasonable to expect clear evidence of why this land and these rights are actually needed, why alternatives have not been explored, and what effort have genuinely gone into reaching agreement with our Landowners.	As outlined in the Statement of Reasons [APP-025], the Applicant considers that the relevant tests for compulsory acquisition have been met. The Applicant confirms that alternatives have been explored and detailed within the Scheme Development Report [APP-073, APP-074 and APP-075], and in Appendix F (Statutory Summer 2024 Consultation) [APP-047] and Appendix G (Statutory Spring 2025 Consultation) [APP-050] to the Consultation Report [APP-029]. The Applicant remains committed to working collaboratively with landowners and its clear preference is to secure voluntary agreements for access and the acquisition of land and rights wherever possible. As outlined in the Statement

Reference	Theme	Issue raised	The Applicant's response
			of Reasons [APP-025], the Applicant has sought to acquire the land and associated rights by voluntary agreement in order to facilitate delivery of the Project. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with landowners regarding voluntary agreements and continues to progress those discussions. To facilitate collective engagement on voluntary agreements, a number of professional representatives formed a Land Agent Group in February 2025. The Applicant issued draft Heads of Terms to the Land Agent Group on 3 February 2025 and subsequently engaged in negotiations on the terms. This engagement included in-person meetings with the Land Agent Group and several revisions to both the Heads of Terms and the commercial offering in response to feedback received. Following these discussions, the Applicant commenced issuing Heads of Terms to the owner of the land pertinent to the respondent on the 7 May 2026. The Applicant confirms these terms included bespoke provisions to acknowledge the respondent's potential development. Since acceptance of the DCO application for Examination, the Applicant has made further amendments to clauses within the proposed Heads of Terms and an improved commercial offer to landowners, further demonstrating reasonable efforts to engage constructively and reach a voluntary agreement.
RR-047-17	Greeting	We wish to be registered as an Interested Party and recognised as an Affected Party for the Examination, and wish to be involved in both any ongoing design proposals and the Examination of the application.	The Applicant notes this comment.

Table 2-9 The Applicant's response to RR-061 from Justin Paul Cole on behalf of Cole Family

Reference	Theme	Issue raised	The Applicant's response
RR-061-1	Landowner engagement	Our position This representation is submitted by (redacted) in respect of the Cole family ownership interests in HP761033 at Titchfield Lane, Wickham. We do not object to the principle of the Project. Our objection is to the amount and position of the land and rights Southern Water wants from this holding and the effect on farming and the existing Catesby promoted development. The Land is subject to a pre existing promotion agreement with Catesby Estates. Southern Water has known about the future development aspirations for some time. We therefore expect Southern Water to take and restrict only the land it genuinely needs, to explain why less intrusive alternatives will not work and to coordinate its design with the landowners and Catesby.	The Applicant notes this comment.

Reference	Theme	Issue raised	The Applicant's response
RR-061-2	Location of AGP	1. IPS-G permanent land take, our main objection Plot 14-011 is 29,633 sq m, about 7.32 acres, of proposed permanent freehold acquisition. Southern Water's Design Principles limit the maximum final fenced footprint of IPS-G to 6,990 sq m, about 1.73 acres. That leaves about 22,643 sq m, or 5.59 acres, outside the maximum final fence. We accept that some land outside the fence may be needed for access, drainage, security, screening or necessary mitigation. What has not been properly explained is why all of that additional land needs to be owned permanently by Southern Water.	The Applicant has noted this comment. The land outside the IPS-G (Work No. 5B) footprint is required for access works, drainage works and environmental mitigation. Environmental mitigation is required to integrate the site into the existing environment and screen views of the site from nearby views. The Applicant requires designated mitigation land as a strict deliverable required to offset the direct, adverse environmental impacts and therefore these uses are to be included in the proposed freehold acquisition area so that it can ensure that integrated locational specific mitigation is delivered and that there is adequate enduring management, maintenance and control to ensure the assessed outcomes are capable of delivery across the enduring operational life of the Project for example planting establishes and sustains or to monitor drainage works. All designated mitigation land is strictly required to offset the direct, adverse environmental impacts.
RR-061-3	Location of AGP	Southern Water should identify, area by area, what every part of Plot 14-011 is for, why it needs to be on HP761033 and why freehold is needed rather than a smaller freehold area, defined rights, temporary possession or agreement. IPS-F also provides a useful comparison: its maximum fenced footprint is only 665 sq m smaller than IPS-G, but the permanent freehold associated with IPS-G is about 8,688 sq m greater. We accept the sites are not identical, but Southern Water should explain the site specific reason for that difference.	The Applicant has noted this comment. The land outside the IPS-G (Work No. 5B) footprint is required for access works, drainage works and environmental mitigation. Environmental mitigation is required to integrate the site into the existing environment and screen views of the site from nearby vantage points. The extent of the Work Area for IPS-G (Work No. 5B) and IPS-F (Work No. 5A) differ due to the different environmental baseline at each sites, requiring different approaches to access, drainage and environmental works. The Applicant requires these uses to be included in the proposed freehold acquisition area so that it has control over any management and maintenance, for example to ensure planting establishes or to monitor drainage works.
RR-061-4	Location of the proposed pipeline routes	2. Pipeline, move it as far north as reasonably practicable This has been our position from our very first meetings. Southern Water and Dalcour Maclaren's own minutes of 17 May 2024 record the landowners and Catesby asking why the pipe could not be moved further north to reduce the effect on potential development, and record that the closer to the northern boundary the better. Catesby's July 2024 consultation response repeated that request. Southern Water has referred generally to engineering, hydraulic and environmental constraints, but we still have not been given the land specific technical assessment showing what northerly alternatives were considered and what actual constraint prevents further movement north. The latest route also changes direction as it approaches or leaves the Land. We are not engineers, but Southern Water should explain why that flexibility cannot be used earlier.	The Applicant considered the request to amend the Pipeline so that it follows the northern boundary of the field. Given the field has an irregularly shaped northern boundary, with residential gardens protruding into the field, it is not practicable to align the Pipeline to the field boundary without introducing a number of right-angled bends in the Pipeline. This would adversely impact the hydraulics of the Pipeline, requiring more energy and potentially additional pumping. As well as this, construction of the Pipeline would become closer to the rear of residential properties, potentially increasing impacts. The Applicant has confirmed that no planning application has been made at this site, and the site is not allocated for residential development in Winchester City Council's adopted or emerging local plan. Therefore, it would not be reasonable for the design of the Project to be impacted when there is no certainty that a development will come forward in this location.
RR-061-5	Location of AGP	3. Screening, mitigation and western access Southern Water needs to separate land required for the operation of IPS-G from screening, landscaping, environmental mitigation, BNG and any additional enhancement. If mitigation on HP761033 is intended to deal with effects arising elsewhere in the Project, Southern Water should identify the	The environmental works proposed as part of the wider IPS-G site (Work No. 5B) are required to mitigate adverse impacts associated with the IPS-G development. Table 3-11 in ES Chapter 3 Description of the Proposed Development [APP-082] describes the environmental mitigation and enhancement proposed at IPS-G, differentiating between the different functions of mitigation and enhancement planting. Table 3-11 includes a

Reference	Theme	Issue raised	The Applicant's response
		effect, where it occurs, why our Land has been chosen, what alternatives were considered and why freehold is needed rather than rights or agreement.	description of why the area is required, e.g. the local effects that proposed planting is mitigating.
RR-061-6	Design principles	Design Principles IPS-G_7 and IPS-G_8 provide for woodland and scrub to the west and a 20 metre band of planting to the south where reasonably practicable. In its current form the western planting and permanent land take could restrict access towards the western lane and barns, agricultural machinery movement and land which may be important for future farming or development. Southern Water should explain why the planting cannot be narrowed, moved, designed with access gaps or managed by lesser rights or agreement.	The DCO does not authorise planting on the existing access track, as the design principles only apply to the extent of Work No. 5B as shown on sheet 14 of the Works Plans – 2 of 3 documents [AS-008]. The detailed design of IPS-G (Work No. 5B) and associated environmental works will ensure that access from the field to the existing access track is maintained. Having considered the comments received, the Applicant proposes to add a new design principle to ensure that the detailed design includes an access that enables the landowner to access the remainder of the field within which IPS-G is located. This is reflected in an updated copy of the Design Principles Document submitted at Deadline 1 (Document reference 5.11, DCO Volume 5, Version 1). As per Requirement 3 of the draft DCO [APP-023], the relevant local planning authority will approve the final detailed design for IPS-G.
RR-061-7	Construction impacts and effects	4. Catesby, easements and future development Southern Water should not design its infrastructure in isolation and leave the landowners and Catesby to work around it later. IPS-G, the pipeline, easements, access, roads, drainage, SuDS, utilities, levels, crossings, fencing, screening, mitigation and maintenance all need to be considered alongside the promoted development. The pipeline easement should be the minimum genuinely required and should preserve practical future crossings for roads, drainage, utilities, services and other development infrastructure.	The purpose of the easement is to protect the integrity and operational requirements of the pipeline and to ensure appropriate access for inspection, maintenance, repair and replacement activities. The required width has been determined following a detailed technical assessment, taking account of the pipeline's diameter, depth, construction methodology, location and operational function. For sections of pipeline installed using open-cut construction, the Applicant is seeking an easement width of 11m (5.5m either side of the pipeline). This reflects the access and operational requirements associated with maintaining and, if necessary, excavating the pipeline in the future. Notably, this represents a reduction from the Applicant's published stand-off guidance for water mains of a comparable size and depth [1], which would typically require a wider protected corridor. This reduction from the normal requirement has been communicated to landowners and their agents where this is being challenged. For sections constructed using trenchless techniques, a reduced easement width is considered appropriate, taking into account depth, construction methodology and location. As the pipeline is installed at greater depth and future maintenance or operational access would be undertaken from either side of the trenchless section rather than directly above it, the same level of restriction is not required. The easement width has therefore been tailored to reflect the differing operational requirements of the construction methodologies. The Applicant is therefore satisfied that the easement widths proposed represent the minimum reasonably required to protect the pipeline and secure its safe operation over its lifetime. The process for locating the pipeline is set out in the Scheme Development Report [APP-073 to APP-075 - 3 documents]. Where practicable, the Applicant has located the pipeline to align with field boundaries. However, this has not

Reference	Theme	Issue raised	The Applicant's response
			been possible in all locations due to other technical or environmental considerations. The Applicant continues to engage with affected parties to understand the potential effects of the construction and operation of the Project and to discuss their individual circumstances. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) sets out how the Project would avoid, reduce and mitigate effects on the environment and surrounding area during construction. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in accordance with the Compensation Code and relevant statutory provisions. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits, while retaining suitable flexibility until the detailed design has been confirmed. The Applicant would only exercise compulsory acquisition and temporary use powers over land actually required to deliver the authorised development. The Applicant aims to work collaboratively with potentially affected parties to address concerns and agree solutions wherever practicable. Affected parties are also entitled to seek independent professional advice and reimbursement of associated costs may be provided as part of the negotiation of voluntary agreements or in accordance with established law and practice if the DCO is granted.
RR-061-8	Location of AGP	The effect on development is already shown in Catesby's own master planning. Before Southern Water's proposals Catesby was working with around 220 homes. In 2024 a layout amended around Southern Water's proposals at that time fell to 171 homes. By January 2025 Catesby was showing around 140 to 160 homes with Southern Water, compared with 220 to 245 without it. These are Catesby's figures, not ours. The current DCO permanent land take around IPS-G is now more extensive than the pumping station compound shown on those earlier layouts, so Southern Water should work with the landowners and Catesby to establish what the current proposals now do to the development capacity of the site.	The Applicant has considered the potential for land to become developed and has amended the design of the Project where it intersects with land that is allocated in an adopted or emerging local plan, and where there is a live or approved planning application. The Applicant has confirmed that no planning application has been made at this site, and the site is not allocated for residential development in Winchester City Council's adopted or emerging local plan. Therefore, it would not be reasonable for the design of the Project to be impacted when there is no certainty that a development will come forward in this location.
RR-061-9	Construction impacts and effects	5. Construction access Southern Water proposes construction access from Titchfield Lane across HP761033. We do not want that access automatically removed or reinstated at the end of construction without first discussing the position with the landowners and Catesby. We want the option to retain the physical access for continued farming or future development, subject to any necessary approvals. Retaining it must not give Southern Water any additional permanent operational access rights over HP761033 unless separately agreed.	The construction access proposed at from Titchfield Lane across HP761033 is a temporary construction access. The assessment in the ES Chapter, the Framework CTMP [APP-415] and rights sought within the Draft DCO [APP-023] are all on the basis that this access is temporary and will be removed following the close of construction. To maintain the access after construction a separate planning application would need to be made by the landowner to Hampshire County Council.

Reference	Theme	Issue raised	The Applicant's response
RR-061-10	Legislation, policy and permits	6. Farming, soils and reinstatement The holding has been continuously farmed and cropped for more than 50 years and around three quarters is identified as Subgrade 3a Best and Most Versatile agricultural land. The construction compound area is Grade 4. NPS paragraphs 4.10.14 and 4.10.25 require proper consideration of BMV land and soil impacts. We want proper pre works and post works soil, agronomic, drainage, topographical and relevant ground condition surveys so that the condition before and after construction can be compared properly.	ES Chapter 12 Land use and agriculture [APP-091] provides an assessment on the temporary and permanent loss of agriculture land from the construction and operation of the Project and the impact on soil function. The Outline Soil Resource Management Plan (SRMP) (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) provides for the following measures: • The Contractor will be required to undertake pre and post-construction soil surveys • The Agricultural Liaison Officer (ALO) will be required to prepare the record of condition to capture the conditions of land prior to entry being taken to commence the construction works • The ALO will be required to coordinate the drainage surveys and the sharing of pre- and post-construction construction drainage schemes with landowners, occupiers and agents in advance of construction.
RR-061-11	Construction impacts and effects	The ground conditions are not theoretical. During an earlier survey visit, vehicles attending for Southern Water or its contractors became stuck in wet ground and our tenant had to pull them out. That experience shows why wet ground working, vehicle movements, compaction, drainage, soil handling and reinstatement need proper controls. We have repeatedly requested proper pre works and post works soil and ground surveys so the remaining land can be protected for farming and/or future development. Land returned to us should be no worse than it was before Southern Water's works. If farming suffers as a result, that loss should be properly dealt with. If planning permission is obtained while Southern Water is still on the Land or after it is returned, and its works have left ground, drainage or settlement problems which increase development costs, those additional costs should not simply be left with us, a future owner or developer.	Good construction practices set out in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3), which is secured by a requirement in the DCO, will manage the effects of construction. The mitigation measures outlined in the Outline CEMP will be carried forward and developed into a detailed CEMP, which will be prepared by the Contractor prior to the commencement of construction of the Project. A Construction Drainage Plan will also be developed to manage the quality and quantity of construction-stage drainage. The measures required to be included in the Construction Drainage Plan are set out in the Outline CEMP. The plan will be informed by surveys to locate drains and prepare pre-construction drawings to support appropriate reinstatement. It will be agreed with the Environment Agency (EA) and the relevant lead local flood authority post-DCO consent and will include measures to minimise water within the working area and maintain the ongoing drainage of surrounding land. The importance of soil management and reinstatement is reflected in the Outline Soil Resource Management Plan (SRMP), which is appended to the Outline CEMP. The Contractor, once appointed, would prepare and adhere to the detailed Soil Resource Management Plan in accordance with the Outline SRMP. In addition, as set out in ES Appendix 19.1 Flood Risk Assessment [APP-189 to APP-196 – 8 documents], the detailed design would include the drainage requirements and measures required to prevent deterioration of the existing drainage arrangements. The Applicant aims to work collaboratively with landowners to address concerns and agree solutions wherever practicable. Affected landowners are also entitled to seek independent professional advice and reimbursement of associated costs may be provided as part of the negotiation of voluntary

Reference	Theme	Issue raised	The Applicant's response
			agreements or in accordance with established law and practice if the DCO is granted.
RR-061-12	Landowner engagement	7. Engagement, Heads of Terms and the public Tracker We have engaged for years. Our own time record starts in December 2021. We have attended meetings, instructed advisers, involved Catesby, put forward practical alternatives and allowed the survey access requested of us over a prolonged period. In late 2025 Southern Water suggested a further meeting to discuss the plans. We explained that we first needed the outstanding information, particularly the actual permanent land requirement for IPS-G and the basis for the pipeline route, so that the meeting could be meaningful. That information was not provided and Southern Water did not then arrange the meeting. Important information has often arrived late, in parts and after repeated chasing. Dalcour Maclaren acknowledged on 24 July 2026 that a number of queries were still outstanding and that Southern Water's Project team had been chased. From our perspective Southern Water has become a brick wall to deal with. We cannot say how advice and feedback from Dalcour Maclaren, landowners and their agents is handled internally, but the same fundamental issues remain unresolved. We and Catesby have also asked for feedback on the consultation representations made. None has been provided. We have been told Southern Water is not obliged to give individual feedback, but that leaves us not knowing whether important points were accepted, considered or rejected and, if rejected, why.	The Applicant notes the respondent's comments raised regarding engagement and the quality of information provided during the development of the Project, however as detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken extensive engagement with landowners and considered all feedback provided throughout statutory and non-statutory consultation. The Applicant has sought to provide information on the Project as it has evolved and has considered feedback received from affected parties when refining the design. The Applicant wrote to the respondent and their land agent on the 11 December 2025 to provide an individual response to their feedback on the Summer 2024 and Spring 2025 Consultations. Notwithstanding the above, the Applicant acknowledges that, in the case of this respondent, the requested information was not provided in a timely manner. This was due to the need to coordinate input from a number of disciplines across the Project and to undertake the necessary review and sign-off process. The Applicant has subsequently sought to engage further with the respondent on their latest proposals. The Applicant reached out to the landowner's representative on 11 September 2026 seeking a meeting to discuss the proposal further, but this was rejected by the respondent's land agent on 11 September 2026 who advised that the respondent would not meet until a historic compensation claim was settled. The Applicant had previously sought to agree a resolution to this claim with the landowners and their land agent, however the offer from the Applicant to settle the claim has been rejected by the landowners and their land agent on several occasions. The Applicant most recently attended a site meeting with the respondent and their representative on the 20 October 2026 where the Applicant considers progress was made on the claim, with responses to the respondent's outstanding queries provided via email on the 13 October 2026 ahead of this meeting.
RR-061-13	Landowner engagement	Southern Water issued Heads of Terms on 7 May 2026, but no substantive Heads of Terms negotiations have started. The issue is not simply price. We still dispute what land and rights Southern Water actually needs. Its published Land and Rights Negotiations Tracker shows HP761033 as yellow, which its own key describes as 'Heads of Terms negotiations ongoing'. That does not accurately reflect reality and we want it corrected urgently. Southern Water also says it is confident the necessary land and rights can be acquired voluntarily. We do not understand the basis for that confidence while the land take, pipeline, access, mitigation, easement terms and pre works and post works soil surveys remain unresolved. At a face to face meeting, we were told to submit the time we had spent dealing with the Project. We did so, and our landowner time and expenses claim remains outstanding.	The Applicant has responded on the point regarding the land and rights required in RR-061-46. The Applicant is committed to working collaboratively with landowners and it remains the Applicant's firm preference to reach a voluntary agreement for the acquisition of land and rights where possible. As detailed within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken extensive attempts to meaningfully engage with landowners on voluntary agreements and has continued to have productive discussions with them either directly or through their professional representatives. In February 2025 a number of the professional representatives, including the respondent's land agent, formed a Land Agent Group to collectively consider

Reference	Theme	Issue raised	The Applicant's response
			and progress discussions on Heads of Terms for voluntary agreements to ensure that all land agents representing landowners impacted by the project were represented equally, regardless of land holding or perceived impact. The Applicant issued Heads of Terms to the Land Agent Group on 3 February 2025 to provide them an opportunity to review the proposals and gather comments ahead of the first meeting between the Land Agent Group and the Applicant. The Land Agent Group provided their initial comments on the Heads of Terms on 24 February 2025. Following this, the Applicant undertook a multidisciplinary review of the comments made. In addition to this, several points were also referred to external consultants to ensure a comprehensive review was completed and that the terms were aligned with what was being sought in the DCO application. The Applicant responded to the Land Agent Group on 5 August 2025 with further updates to the Heads of Terms. The first Agent Group meeting was held on 10 September 2025 where the Applicant and the Land Agent Group reviewed and discussed comments on the Heads of Terms. There was a second meeting on 23 January 2026 to discuss further feedback from the Land Agent Group, after which the Applicant issued the final template for the Heads of Terms on 26 February 2026. Following this, the Applicant commenced issuing Heads of Terms to landowners on 6 March 2026. The Applicant then reviewed further feedback received in June 2026 from the Land Agent Group on both the terms and commercial offer. A third Land Agent Group meeting was held to discuss these points further on the 14 July 2026. Based on this feedback the Applicant wrote to all landowners on the 7 August 2026 with an improved commercial offer and amended terms to address further points from the Land Agent Group including those referenced by the respondent. The Applicant considers that this sustained programme of engagement and negotiation demonstrates that significant efforts have been made to secure voluntary agreements prior to, and alongside, the compulsory acquisition process. The Applicant has subsequently sought to engage further with the respondent on Heads of Terms. To demonstrate this position, the Applicant reached out to the landowner's representative on 11 September 2026 seeking a meeting to discuss the proposal further, but this was rejected by the respondent's land agent on 11 September 2026 who advised that the respondent would not meet until a historic compensation claim was settled. The Applicant had previously sought to agree a resolution to this claim with the landowners and their land agent, however the offer from the Applicant to settle the claim has been rejected by the landowners and their land agent on several occasions. The Applicant most recently attended a site meeting with the respondent and their representative on the 20 October 2026 where the Applicant considers progress

Reference	Theme	Issue raised	The Applicant's response
			was made on the claim, further evidencing the Applicant's attempts to reach a voluntary agreement. Therefore, the Applicant considers that status of yellow in the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), which describes as 'Heads of Terms negotiations ongoing,' does accurately reflect the current position, given the Applicant remains willing to discuss voluntary agreements and is continuing to seek engagement with the respondent's land agent regarding their feedback and comments on the Heads of Terms.
RR-061-14	Landowner engagement	8. Compulsory acquisition and funding Southern Water is asking for extensive compulsory powers over private land. We are not saying it can never take land or rights needed for the Project. We are saying it should have to show what it needs, why it needs it here and why it needs freehold rather than a lesser interest. The land and rights taken should be no more than reasonably required. Southern Water should also confirm that the funding provision in APP-026 is adequate for the statutory consequences of the powers sought over HP761033, including effects on retained land where applicable.	The Applicant confirms that under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors that the Applicant considers demonstrate that the conditions in section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance, have been satisfied. As detailed within the Statement of Reasons [APP-025], temporary possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the project. Section 5.3.2 of the Statement of Reasons [APP-025] confirms that the Applicant has only included powers to compulsorily acquire the freehold interest in land where the acquisition of rights or taking of temporary possession would not be sufficient or appropriate to enable the construction, operation or maintenance of the Project. The Applicant refers to the response in RR-061-46 which clarifies where the requirement for permanent acquisition of the freehold is required and why permanent rights and temporary possession are insufficient for the operational requirements. The Funding Statement (Document reference 4.2, DCO Volume 4, Version 1) demonstrates that the necessary funding for the Project can be secured. As part of the preparation of the Funding Statement (Document reference 4.2, DCO Volume 4, Version 1), the potential land acquisition and compensation costs were assessed by a Chartered Surveyor from the property specialist firm Dalcour Maclaren in the form of a Property Cost Estimate. As part of this exercise, the private loss of each landowner and occupier was considered and factored into the overall Property Cost Estimate.

Reference	Theme	Issue raised	The Applicant's response
RR-061-15	Location of AGP	What would materially resolve our objections • Reduce Plot 14-011 to the minimum permanent land genuinely needed and explain every part of the remaining area.	The extent of IPS-G (Work No. 5B) is considered to represent the full extent of land required by the Applicant, to ensure the operability of the site and to ensure any adverse effects associated with the site can be adequately mitigated. The Applicant requires these uses to be included in the proposed freehold acquisition area so that it has control over any management and maintenance, for example to ensure planting establishes or to monitor drainage works.
RR-061-16	Location of the proposed pipeline routes	• Move the pipeline to the northernmost reasonably practicable position and provide the technical reasons if that cannot be done.	The Applicant considered the request to amend the Pipeline so that it follows the northern boundary of the field. Given the field has an irregularly shaped northern boundary, with residential gardens protruding into the field, it is not practicable to align the Pipeline to the field boundary without introducing a number of right-angled bends in the Pipeline. This would adversely impact the hydraulics of the Pipeline, requiring more energy and potentially additional pumping. As well as this, construction of the Pipeline would become closer to the rear of residential properties, potentially increasing impacts.
RR-061-17	Landowner engagement	• Separate operational land from screening, mitigation, enhancement and BNG, and use rights or agreement instead of freehold wherever that will do the job.	The Applicant notes this comment and would welcome the opportunity to discuss these matters further with the respondent.
RR-061-18	Construction impacts and effects	• Protect western access and give the landowners the option to retain the Titchfield Lane construction access without creating new permanent Southern Water rights unless agreed.	Please refer to the Applicant's response to RR-061-9.
RR-061-19	Landowner engagement	• Work properly with the landowners and Catesby on easements, crossings, roads, drainage, SuDS, utilities, screening, mitigation and the other future development interfaces, and establish what the current DCO proposals now do to the development capacity of the site.	The Applicant has responded on the easements point in RR-061-7. The Applicant has also responded on the queries regarding the land required for the IPS G site, including crossings, roads, drainage, SuDs and utilities at RR-061-2. Finally, the Applicant has provided a response on the screening and mitigation required in RR-061-5. The Applicant acknowledges that the final design of the Project will impact the respondent's proposed development. As evidenced in the Statement of Reasons [APP-025], the Applicant considers that the land required for the Project has been justified. has been justified. Although the Applicant is willing to work with the respondent to coordinate proposal and reach a voluntary agreement, the Applicant wishes to highlight that the land being promoted for residential development is not allocated in the local plan or subject to a planning application. On this basis, the Applicant considers it would not be reasonable for the design of the Project to be impacted when there is no certainty the development would materialise. As stated within the Statement of Reasons [APP-025], temporary possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily

Reference	Theme	Issue raised	The Applicant's response
			acquire the minimum extent of land and rights required to operate and maintain the project thus mitigating the extent of the acquisition of land and rights. The Applicant most recently attended a site meeting with the respondent and their representative on the 20 October 2026 to discuss how the Project can work with the respondent and Catesby. Further responses to the respondent's outstanding queries were provided via email on the 13 October ahead of this meeting.
RR-061-20	Land use and agriculture	• Protect more than 50 years of farming through proper soil, drainage, wet ground working and reinstatement controls, including the pre works and post works surveys already requested.	A SRMP will be in effect for the duration of the construction and operation phases of the Project. An Outline SRMP is provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), secured by Requirement 6 of the Draft DCO [APP-023], and includes protocols for determining appropriate soil handling conditions in relation to soil moisture state and rainfall criteria. The soils will be managed according to industry good practice to minimise damage caused to soils, including through compaction by machinery. The Outline SRMP also includes measures relating to soil handling, storage and reinstatement to minimise the risk of soil erosion and sediment runoff. The Outline SRMP highlights the appointment of an Agricultural Liaison Officer (ALO) who will be the primary point of contact for landowners to raise concerns during construction. The roles of the ALO are set out in paragraph B.2.16 and include preparing a pre-construction Record of Condition against which post-construction condition can be compared, the undertaking of site inspections during construction to monitor working practices including implementation of soil handling methodologies, and discussing and agreeing reinstatement measures on completion of construction works.
RR-061-21	Landowner engagement	• Provide the outstanding information, answer the alternatives we have put forward and correct the Land and Rights Negotiations Tracker urgently.	The Applicant has responded to the respondent's comments on alternatives in RR-061-4. The Applicant has sought to engage further with the respondent on their latest proposals where reasonably practicable to do so. To demonstrate this position, the Applicant reached out to the landowner's representative on 11 September 2026 seeking a meeting to discuss the proposal further, but this was rejected by the respondent's land agent on 11 September 2026 who advised that the respondent would not meet until a historic compensation claim was settled. The Applicant had previously sought to agree a resolution to this claim with the landowners and their land agent, however the offer from the Applicant to settle the claim has been rejected by the landowners and their land agent on several occasions. The Applicant most recently attended a site meeting with the respondent and their representative on the 20 October 2026 to discuss how the Project can work with the respondent and Catesby where the Applicant considers progress was made on the claim. Further responses to the respondent's outstanding queries were provided via email on the 13 October ahead of this meeting.

Reference	Theme	Issue raised	The Applicant's response
RR-061-22	Landowner engagement	• Continue genuine negotiations on the actual land and rights required and settle the outstanding time and expenses claim.	The Applicant remains committed to working collaboratively with landowners and its clear preference is to secure voluntary agreements for access and the acquisition of land and rights wherever possible. The Applicant has subsequently sought to engage further with the respondent on Heads of Terms. To demonstrate this position, the Applicant reached out to the landowner's representative on 11 September 2026 seeking a meeting to discuss the proposal further, but this was rejected by the respondent's land agent on 11 September 2026 who advised that the respondent would not meet until a historic compensation claim was settled. The Applicant had previously sought to agree a resolution to this claim with the landowners and their land agent, however the offer from the Applicant to settle the claim has been rejected by the landowners and their land agent on several occasions. The Applicant most recently attended a site meeting with the respondent and their representative on the 20 October 2026 where the Applicant considers progress was made on the claim, further evidencing the Applicant's attempts to reach a voluntary agreement.
RR-061-23	Landowner engagement	Our aim We have been in discussion with King's Counsel about where, as affected landowners, we should focus our efforts. We are not trying to stop the Project as a whole. Our aim is to nudge it away from unnecessary harm to our land and get to an amicable agreement with Southern Water. At the moment that is difficult. The juggernaut is moving forward, but basic questions about the land take, pipeline and other matters above remain unanswered. If Southern Water works properly with us and Catesby, the Project could be designed to work with, rather than against, the farming and future development of the Land, allowing it to continue supporting farming and potentially contribute to local and wider housing and commercial needs.	The Applicant notes this comment and most recently attended a site meeting with the respondent and their representative on the 20 October 2026 to discuss these matters further.
RR-061-24	Landowner engagement	1. Introduction This representation is submitted by Jonathan Sweeney, Mark Hayward and Justin Cole in respect of the Sweeney, Hayward and Cole family ownership interests in land registered under title HP761033 at Titchfield Lane, Wickham, Hampshire, referred to below as the Land. The Land is directly affected by the proposed Southern Water Hampshire Water Transfer and Water Recycling Project through permanent freehold acquisition, a permanent pipeline easement, temporary possession, construction compounds, access works, screening, landscaping, environmental mitigation and associated rights. We do not object to the principle of the Project or to the need for strategic water infrastructure. We do object to the extent, position and justification of the land and rights being sought over HP761033 and to key alternatives remaining unresolved despite having been raised repeatedly for more than two years.	The Applicant notes this comment and responds to the issues raised in this representation below.

Reference	Theme	Issue raised	The Applicant's response
RR-061-25	Location of AGP	Our main concerns are: • the excessive permanent land take associated with IPS-G;	Please refer to the Applicant's responses to RR-061-2, RR-061-3 and RR-061-15.
RR-061-26	Location of AGP	• the effect of that land take on good agricultural land which has been continuously farmed and cropped for more than 50 years;	The Applicant has noted this comment, and also notes that the agricultural land in this field would be lost if the proposed residential development came forward. Please refer to the Applicant's response to RR-061-41.
RR-061-27	Cumulative effects	• the effect on the existing Catesby promoted development;	The Applicant has considered the potential for land to become developed and has amended the design of the Project where it intersects with land that is allocated in an adopted or emerging local plan, and where there is a live or approved planning application. The Applicant has confirmed that no planning application has been made at this site, and the site is not allocated for residential development in Winchester City Councils (WCCs) adopted or emerging local plan. Therefore, it would not be reasonable for the design of the Project to be impacted when there is no certainty that a development will come forward in this location.
RR-061-28	Location of the proposed pipeline routes	• the failure to move the pipeline as far north as reasonably practicable despite repeated requests;	Please refer to the Applicant's response at RR-061-4.
RR-061-29	Location of AGP	• screening, landscaping, biodiversity and environmental mitigation being placed on the Land;	As per design principles IPS-G_6, IPS-G_7 and IPS-G_8 which are contained within the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1), this is required for environmental mitigation to mitigate the effects of the Project assessed in the ES, particularly assessments in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) and ES Chapter 13 Landscape and visual (Document reference 6.1, DCO Volume 6, Version 1).
RR-061-30	Construction impacts and effects	• construction access from Titchfield Lane and the need to preserve useful access after the works without creating new permanent Southern Water rights unless agreed;	Please refer to the Applicant's responses to RR-061-9 and RR-061-18.
RR-061-31	Landowner engagement	• the effect of the permanent land take and western planting on access towards the western lane and barns;	The DCO does not authorise planting on the existing access track, as the design principles only apply to the extent of Work No. 5B as shown on Sheet 14 of the Works Plans – 2 of 3 documents [AS-008]. The detailed design of IPS-G (Work No. 5B) and associated environmental works will ensure that access from the field to the existing access track is not blocked.
RR-061-32	Construction impacts and effects	• the width and restrictions associated with the permanent pipeline easement and the need for practical future crossing rights;	Please refer to the Applicant's response to RR-061-7.

Reference	Theme	Issue raised	The Applicant's response
RR-061-33	Landowner engagement	• drainage, SuDS, levels, utilities and other matters which need to be coordinated with the landowners and Catesby;	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. The Applicant would welcome the opportunity to discuss these matters further with the respondent.
RR-061-34	Land use and agriculture	• soil condition, wet ground working, drainage, compaction and proper reinstatement;	The Applicant acknowledges the concerns regarding soil condition, wet ground working, drainage, soil compaction and land reinstatement. An Outline SRMP is included as Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). The Outline SRMP includes protocols for determining appropriate soil handling conditions, including soil moisture status and rainfall criteria, to minimise the risk of soil damage during construction. Soils will be managed in accordance with established industry good practice to minimise compaction and structural damage, including through appropriate handling, storage and reinstatement procedures. The Outline SRMP also includes measures relating to soil stripping, stockpiling, reinstatement and monitoring, together with measures in the Outline CEMP to minimise the risk of soil erosion and sediment runoff. The Contractor will prepare and implement the detailed SRMP(s) in accordance with the Outline SRMP. These measures are contained within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and secured through the relevant requirements of the draft DCO [APP-023].
RR-061-35	Landowner engagement	• temporary possession, compounds and haul routes; and	The detailed design of the Project, including the particulars of land access requirements will be developed following grant of consent and subject to approval by the relevant authorities. Prior to undertaking detailed design as a post-consent activity, it is not possible to confirm the precise area of land required or the duration of temporary possession. This is consistent with the 'Rochdale Envelope' approach where flexibility is required to address uncertainty that exists prior to the Project being consented, further detail on this is provided in ES Chapter 3 Description of the Proposed Development [APP-082]. The Applicant is committed to keeping landowners informed as the design evolves and will provide clarity on land use requirements as soon as practicable. Sheet 14 and 15 of the Works Plans – 2 of 3 documents [AS-008] shows the location of construction compounds in this location.
RR-061-36	Location of the AGP	• the continuing lack of complete land specific information and proper technical justification for important alternatives we have raised;	The site for IPS-G (Work No. 5B) has been subject to an extensive site selection process, as set out in Sections 5.12 of the Scheme Development Report [APP-073]. Regarding alternatives for the Pipeline, the Applicant also considered a number of alternative routes in the surrounding area, as set out in Sections 5.6 of the Scheme Development Report [APP-073]. RR-061-4 sets out the

Reference	Theme	Issue raised	The Applicant's response
			Applicant's response to the request for the pipeline to be moved to the northern edge of the field.
RR-061-37	Landowner engagement	• the published Land and Rights Negotiations Tracker not accurately reflecting reality, including showing Heads of Terms negotiations as ongoing when no substantive negotiations have started; and	Please refer to the Applicant's response to RR-061-13.
RR-061-38	Landowner engagement	• the unresolved landowner time and expenses claim.	The Applicant has previously sought to agree a resolution to this claim with the landowners and their land agent, however the offer from the Applicant to settle the claim has been rejected by the landowners and their land agent on several occasions. The Applicant does not consider the claim received by the respondent to be reasonable nor reflect an actual loss incurred. Nonetheless, the Applicant stands by the offer previously made despite it being in excess of what the Applicant considers an actual loss incurred in order to encourage the respondent to engage with the Project. The Applicant met with the respondent on 20 October 2026 where the Applicant considers progress was made on the claim.
RR-061-39	Landowner engagement	We have not simply objected. We and our agent have attended meetings, provided information, asked detailed questions and repeatedly suggested practical ways of reducing the effect on the Land. These have included reducing the IPS-G land take, moving the pipeline north, protecting access and crossing rights, reconsidering screening and mitigation, and coordinating Southern Water's design properly with the landowners and Catesby. Before extensive compulsory powers are granted, Southern Water should have to explain clearly why the land and rights it wants are needed, why less damaging alternatives have not been adopted and why a smaller freehold area, defined rights, temporary possession or agreement would not be enough. The Representors wish to be registered as Interested Parties and recognised as Affected Persons for the purposes of the Examination.	The Applicant notes this comment and most recently attended a site meeting with the respondent and their representative on the 20 October 2026 to discuss these matters further. Please refer to the Applicant's responses to RR-061-2, RR-061-3 and RR-061-15.
RR-061-40	Land use and agriculture	2. The Land, farming history, Catesby promotion and proposed works The Land at Titchfield Lane, Wickham is shown on the Works Plans at Sheets 14 and 15 of 30. The works affecting it include IPS-G / Work No. 5B, permanent freehold acquisition, the pipeline and easement, temporary possession, construction compounds, access from Titchfield Lane, screening, landscaping, drainage and environmental mitigation. Southern Water's Agricultural Land Classification material identifies around three quarters of the Land as Subgrade 3a Best and Most Versatile agricultural land. The area identified for the construction compound is Grade 4.	The Applicant notes the comment. ES Appendix 12.1 Agricultural land Quality [APP-169] identifies the distribution of agricultural land quality within the Order Limits, including areas of Subgrade 3a Best and Most Versatile (BMV) agricultural land. The effects of the Project on agricultural land resources are assessed in ES Chapter 12 Land use and agriculture [APP-091]. The assessment concludes that the temporary loss of BMV agricultural land during construction would result in a moderate adverse significant effect for Grades 1 and 2 land and a minor adverse, non-significant effect on Subgrade 3a land. The permanent loss of agricultural land associated with Above Ground Plant (AGP) at IPS-G would result in a minor adverse, non-significant effect on Subgrade 3a land. The siting of the AGP was subject to a site selection process before being brought forward, as detailed in ES Chapter 4 Consideration of alternatives

Reference	Theme	Issue raised	The Applicant's response
			[APP-083] and the Scheme Development Report [APP-073, APP-074, APP-075 – 3 documents]. The initial site selection process noted the land at IPS-G to be Grade 3, which is a provisional grading and is not definitive. The classification as Subgrade 3a at the site detailed in ES Chapter 12 Land use and agriculture [APP-091] is based on subsequent detailed survey data which was not available at the time of the initial site selection exercise. The classification of one soil profile in an adjacent field parcel as Grade 4 is an indicative grade based on the analysis of a sample of topsoil and subsoil taken from the field. The agricultural land grade is only one of several considerations in developing the design of the Project. Mitigation measures secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) include the implementation of a SRMP, which sets out requirements for the stripping, storage, handling and reinstatement of soils. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), [APP-413] and [APP-414] for documents 2 and 3 also includes measures to maintain agricultural access where reasonably practicable, provide additional crossing points where feasible, relocate field water supplies where necessary and engage with affected landowners and occupiers throughout construction. Following construction, temporarily affected land would be reinstated to support its return to agricultural use.
RR-061-41	Landowner engagement	More than 50 years of farming The holding has been continuously farmed and cropped for more than 50 years. That matters because the proposals are not simply affecting an unused parcel of land. They affect a long established productive agricultural holding. Permanent acquisition removes farmed land altogether, while temporary possession, haul routes, compounds and construction traffic can affect the condition and productivity of the retained land if they are not properly controlled and reinstated.	The Applicant has responded on the mitigation measures relating to agricultural land in RR-061-20. The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss. In relation to the permanent loss of arable land, the Applicant notes that the respondent is itself proposing residential development on the land as referenced in their relevant representation which may result in changes to the existing agricultural use of the land. The Applicant remains committed to working collaboratively with landowners and its clear preference is to secure voluntary agreements for access and the acquisition of land and rights wherever possible.

Reference	Theme	Issue raised	The Applicant's response
			The Applicant has subsequently sought to engage further with the respondent on Heads of Terms. To demonstrate this position, the Applicant reached out to the landowner's representative on 11 September 2026 seeking a meeting to discuss the proposal further, but this was rejected by the respondent's land agent on 11 September 2026 who advised that the respondent would not meet until a historic compensation claim is settled. The Applicant had previously sought to agree a resolution to this claim with the landowners and their land agent, however the offer from the Applicant to settle the claim has been rejected by the landowners and their land agent on several occasions. The Applicant most recently attended a site meeting with the respondent and their representative on the 20 October 2026 to discuss these matters further and considers progress was made on the claim.
RR-061-42	Landowner engagement	Preexisting Catesby promotion agreement The Land is subject to a preexisting promotion agreement with Catesby Estates for future development. We do not disclose or rely on the confidential commercial terms of that agreement in this representation. Southern Water is already aware of the promoted status and future development aspirations of the Land and has acknowledged those matters in its dealings with us, including in the Heads of Terms issued for HP761033. The development issue is therefore not new and has not been raised simply because the DCO is now being examined. Southern Water should design and implement its proposals so that permanent loss, sterilisation and restriction of land are kept to the minimum reasonably necessary. This means proper coordination with the landowners and Catesby before relevant parts of the detailed design become fixed.	The Applicant acknowledges that the final design of the Project will impact the respondent's proposed development. As evidenced in the Statement of Reasons [APP-025], the Applicant considers that the land required for the Project has been justified. Although the Applicant is willing to work with the respondent to coordinate proposal and reach a voluntary agreement, the Applicant wishes to highlight that the land being promoted for residential development is not allocated in the local plan or subject to a planning applicant. On this basis, the Applicant considers it would not be reasonable for the design of the Project to be impacted when there is no certainty the development would materialise. The Applicant most recently attended a site meeting with the respondent and their representative on the 20 October 2026 to discuss these matters further and consider how future development aspirations can be coordinated. As stated above and within the Statement of Reasons [APP-025], temporary possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the project thus mitigating the extent of the acquisition of land and rights. The Applicant remains committed to working collaboratively with landowners and its clear preference is to secure voluntary agreements for access and the acquisition of land and rights wherever possible. The Applicant has subsequently sought to engage further with the respondent on Heads of Terms. To demonstrate this position, the Applicant reached out to the landowner's representative on 11 September 2026 seeking a meeting to discuss the proposal further, but this was rejected by the respondent's land agent on 11 September 2026 who advised that the respondent would not meet until a historic compensation claim was settled. The Applicant had previously sought to agree a resolution to this claim with the landowners and their land agent, however the offer from the Applicant to settle the claim has been rejected by the landowners and their land agent on several occasions.

Reference	Theme	Issue raised	The Applicant's response
			The Applicant most recently attended a site meeting with the respondent and their representative on the 20 October 2026 to discuss these matters further and consider how future development aspirations can be coordinated. The Applicant considers progress was made on the claim.
RR-061-43	Landowner engagement	Coordination with the landowners and Catesby Southern Water should not simply tell the landowners and Catesby what it has decided to build and expect the future development to work around it. The following matters need to be considered together wherever they overlap: • the location and final footprint of IPS-G; • permanent land take; • pipeline alignment; • easement width and restrictions; • future road, utility and drainage crossings, highway visibility splays; • construction and future access; • internal roads; • drainage, attenuation, SuDS and soakaways; • levels and utility routes; • fencing and security; • screening and landscaping; • biodiversity and environmental mitigation; • temporary construction land; • soil handling and ground condition; • reinstatement; and • future maintenance access. There may be areas where Southern Water and the future development both need access, drainage, attenuation, service corridors, landscaping or mitigation. If so, those requirements should be looked at together. A compatible design may reduce land take and avoid Southern Water sterilising land which Catesby would otherwise be able to use efficiently.	The Applicant acknowledges that the final design of the Project will impact the respondent's proposed development. As evidenced in the Statement of Reasons [APP-025], the Applicant considers that the land required for the Project has been justified. Although the Applicant is willing to work with the respondent to coordinate proposal and reach a voluntary agreement, the Applicant wishes to highlight that the land being promoted for residential development is not allocated in the local plan or subject to a planning applicant. On this basis, the Applicant considers it would not be reasonable for the design of the Project to be impacted when there is no certainty the development would materialise. Notwithstanding the above, the Applicant is open to engaging with the respondent on their latest proposals where reasonably practicable to do so. To demonstrate this position, the Applicant reached out to the landowner's representative on 11 September 2026 seeking a meeting to discuss the proposal further, but this was rejected by the respondent's land agent on 11 September 2026 who advised that the respondent would not meet until a historic compensation claim was settled. The Applicant had previously sought to agree a resolution to this claim with the landowners and their land agent, however the offer from the Applicant to settle the claim has been rejected by the landowners and their land agent on several occasions. The Applicant most recently attended a site meeting with the respondent and their representative on the 20 October 2026 to discuss these matters further and consider how future development aspirations can be coordinated. The Applicant considers progress was made on the claim.
RR-061-44	Location of the AGP	3. Ground 1, excessive permanent land take for IPS-G Our first and most important concern is the amount of land Southern Water wants to own permanently around IPS-G. The Book of Reference, Document 4.3, identifies Plot 14-011 as 29,633 sq m of agricultural land and woodland to be acquired permanently in freehold, about 7.32 acres. Southern Water's Design Principles Document, Document	Outside of the maximum footprint of the IPS-G site (Work No. 5B) the Applicant requires land for access and drainage works and environmental mitigation works. The environmental mitigation works are required to provide visual screening of views from residential properties and improve ecological connectivity. Please also refer to the response to RR-061-45.

Reference	Theme	Issue raised	The Applicant's response
		5.11, Design Principle IPS-G_3, limits the maximum final footprint of IPS-G to 6,990 sq m, about 1.73 acres, and defines footprint as the area within the external fence. That means the proposed freehold acquisition is about 4.24 times the maximum final fenced IPS-G site. About 22,643 sq m, or 5.59 acres, lies outside the maximum final fence. That is a very large difference and Southern Water should explain it properly. Section 122 of the Planning Act 2008 means Southern Water has to show that the land it wants to acquire compulsorily is required for the development, or to facilitate or be incidental to it, and that there is a compelling case in the public interest. In simple terms, the land and rights taken should be no more than reasonably required. Southern Water should justify Plot 14-011 itself, not just the Project generally. We accept that some land outside the final fence may be needed for legitimate purposes. What we do not accept is that the whole 29,633 sq m can simply be treated as necessary permanent freehold without a proper breakdown.	The Applicant most recently attended a site meeting with the respondent and their representative on the 20 October 2026 to discuss these matters further and consider how future development aspirations can be coordinated.
RR-061-45	Landowner engagement	Southern Water should identify separately: • the final operational compound; • security and fencing land; • any permanent access need; • drainage and SuDS; • operational maintenance space; • visual screening; • landscaping; • environmental or biodiversity mitigation; • buffer zones; • contingency or design flexibility; and • anything else for which land is being acquired. For each of those areas Southern Water should explain what it is for, why it needs to be on HP761033 in that position and extent, and why freehold is required instead of temporary possession, defined rights, agreement with the landowners or another less intrusive way of delivering the same purpose. The Book of Reference itself shows Southern Water using less intrusive mechanisms on adjoining parts of the same holding. Plot 14-007, 359 sq m, and Plot 14-012, 19,607 sq m, are identified for acquisition of rights. Plots 14-013, 6,108 sq m, and 14-014, 9,231 sq m, are identified for temporary possession. Southern Water should therefore explain why every part of Plot 14-011 has to be owned outright.	The Applicant confirms that compulsory acquisition powers are sought across plot 14-011 in respect of all interests (including freehold) as shown edged black and shaded pink on the Land Plans (Document reference 2.2, DCO Volume 2, Version 2) in connection with Works No.5B shown on the Works Plans [AS-008]. The nature and extent of the works including the permanent change of land use from its current agricultural purpose, together with the Applicant's requirement to exercise ongoing control over the land and restrict access to authorised personnel, are incompatible with continued use by the current landowners. On this basis, the acquisition of the freehold is necessary, proportionate and justified. The Applicant confirms that compulsory acquisition powers are sought for rights and the creation of new rights (including imposing restrictive covenants) over plot 14-012 which is shown edged black and shaded blue on the Land Plans (Document reference 2.2, DCO Volume 2, Version 2) in connection with Works No.4 as being construction of a pipeline between the Water Recycling Plant and Otterbourne Water Supply Works. Finally, the Applicant confirms that temporary possession powers have been sought over plot 14-013 and 14-014 which is shown edged black and shaded yellow on the Land Plans (Document reference 2.2, DCO Volume 2, Version 2) in connection with Works No.6 as being the establishment of temporary construction compounds. Further details on the rights sought by the Applicant in respect of the land referred to by the respondent can be found within Schedule 5 to the Draft DCO [APP-023] and shown on Sheet 14 and Sheet 15 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2). The respondent can also find details on the types of works to be undertaken on Sheet 14 and Sheet 15 of the Works Plans ([AS-008].

Reference	Theme	Issue raised	The Applicant's response
			In accordance with the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition have been met. As detailed within the Statement of Reasons [APP-025], temporary use powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the project thus mitigating the extent of the acquisition of land and rights. It remains the Applicant's firm preference to reach a voluntary agreement for the acquisition of land and rights where possible and the Applicant is willing to discuss voluntary agreement requirements further with the respondent. The Applicant will continue to engage with the respondent's land agent regarding their feedback and comments on the Heads of Terms. The Applicant most recently attended a site meeting with the respondent and their representative on the 20 October 2026 to discuss these matters further and consider how future development aspirations can be coordinated.
RR-061-46	Design of the AGP	Comparison with IPS-F IPS-F is a useful comparison because IPS-F and IPS-G are both Intermediate Pumping Stations. The Design Principles limit the maximum final IPS-F footprint to 6,325 sq m and IPS-G to 6,990 sq m. Both have a maximum building height of 8 metres. We accept that site conditions can differ and are not saying both sites must have exactly the same amount of land. However, the Book of Reference identifies permanent freehold plots associated with IPS-F totalling about 20,945 sq m, compared with 29,633 sq m at IPS-G. The maximum final IPS-G footprint is only 665 sq m larger, but the permanent freehold is about 8,688 sq m, or 2.15 acres, greater. That difference makes a clear site specific explanation for IPS-G important.	The land requirements associated with an Intermediate Pumping Station F (IPS-F) and Intermediate Pumping Station G (IPS-G) are not determined solely by the footprint of the final operational asset. Site-specific requirements such as permanent access arrangements, topography, drainage, landscaping, environmental mitigation, maintenance access, utility connections, security requirements and the configuration of the pipeline connections can all influence the extent of land required. The ES identifies that both IPS-F and IPS-G include associated access and environmental mitigation measures which are specific to their individual locations.
RR-061-47	Location of AGP	Best and Most Versatile agricultural land Around three quarters of HP761033 is identified as Subgrade 3a Best and Most Versatile agricultural land. The National Policy Statement for Water Resources Infrastructure, July 2025, identifies Grades 1, 2 and 3a as Best and Most Versatile land. Paragraph 4.10.14 says applicants should seek to minimise impacts on Best and Most Versatile agricultural land and, where significant development on agricultural land is necessary, use poorer quality land where possible. Paragraph 4.10.25 says the Secretary of State will take account of the economic and other benefits of Best and Most Versatile land and expect appropriate soil mitigation. Southern Water should therefore explain how the permanent acquisition and rights affecting Subgrade 3a land have been minimised, what use of poorer quality land has been considered and why the interests now sought are the	The process to locate the AGP sites and the Pipeline, as set out in the Scheme Development Report [APP-073 to APP-075], has considered the potential impacts on best and most versatile agricultural land in line with the National Policy Statement for Water Resources Infrastructure. An IPS is required in this location due to the topography of the Pipeline between the WRP site and Otterbourne WSW. Much of the land in this area is either Grade 2 of 3 agricultural land, and therefore there is limited opportunity to avoid potential Best and Most Versatile agricultural land. The Applicant has also had to consider other factors when siting IPS-G, including impacts on the environment and the local community which are also subject to policy set out in the National Policy Statement for Water Resources Infrastructure. The Applicant notes the comment. ES Appendix 12.1 Agricultural Land Quality [APP-169] identifies the distribution of agricultural land quality within the Order Limits, including areas of Subgrade 3a Best and Most Versatile agricultural land. The effects of the Project on agricultural land resources are assessed in

Reference	Theme	Issue raised	The Applicant's response
		minimum reasonably necessary. This is particularly relevant when Grade 4 land exists within the holding and is already proposed for temporary construction use.	ES Chapter 12 Land Use and Agriculture [APP-091], which considers both temporary and permanent land requirements and identifies mitigation measures to minimise effects and facilitate reinstatement of affected land following construction.
RR-061-48	Landowner engagement	Effect on the promoted development The effect on the promoted development is already real, not theoretical. Catesby's earlier work showed around 220 homes before Southern Water's proposals. An April 2024 layout amended around the then pipeline, easement and 70 metre by 90 metre compound showed 171 homes, and Catesby's July 2024 consultation response described the reduction as about 50 homes, from around 220 to around 170. By January 2025 Catesby was showing around 140 to 160 homes on a layout accommodating Southern Water, compared with 220 to 245 homes on an alternative without Southern Water. These are Catesby's own masterplanning figures, not figures we have produced for this representation. The current DCO now seeks 29,633 sq m of permanent freehold around IPS-G. That is a much more extensive permanent land take than the pumping station compound shown on the earlier Catesby layout. Southern Water should therefore work with the landowners and Catesby to establish what the current DCO proposals now do to the site's development capacity and whether the land take or layout can be changed to reduce that effect.	The Applicant has responded to comments regarding future development in RR-061-8. The Applicant acknowledges that there have been changes to the layout of the proposal since 2024. This has been as a result of the survey data obtained, refinement to project requirements and the consultation process. Although the Applicant is willing to work with the respondent to coordinate proposal and reach a voluntary agreement, the Applicant wishes to highlight that the land being promoted for residential development is not allocated in the local plan or subject to a planning applicant. On this basis, the Applicant considers it would not be reasonable for the design of the Project to be impacted when there is no certainty the development would materialise. Notwithstanding the above, the Applicant is open to engaging with the respondent on their latest proposals where reasonably practicable to do so. To demonstrate this position, the Applicant reached out to the landowner's representative on 11 September 2026 seeking a meeting to discuss the proposal further, but this was rejected by the respondent's land agent on 11 September 2026 who advised that the respondent would not meet until a historic compensation claim was settled. The Applicant had previously sought to agree a resolution to this claim with the landowners and their land agent, however the offer from the Applicant to settle the claim has been rejected by the landowners and their land agent on several occasions. The Applicant most recently attended a site meeting with the respondent and their representative on the 20 October 2026 to discuss these matters further and consider how future development aspirations can be coordinated. The Applicant considers progress was made on the claim.
RR-061-49	Location of AGP	Screening and environmental mitigation Southern Water also needs to separate land genuinely needed for the operation of IPS-G from land needed for screening, landscaping, environmental mitigation, BNG or additional environmental enhancement. These are different purposes and should not simply be grouped together as a reason for permanent freehold acquisition. Southern Water's own Design Principles distinguish necessary environmental mitigation from additional environmental enhancement. They say compulsory acquisition is not sought solely for additional enhancement. Any mitigation on HP761033 should therefore be identified by reference to the actual Project effect it is intended to address. We are particularly concerned that some of the land may be intended to provide mitigation for effects arising elsewhere in the Project rather than	The environmental works proposed as part of the wider IPS-G site (Work No. 5B) are required to mitigate adverse impacts associated with the IPS-G development. Table 3-11 in ES Chapter 3 Description of the Proposed Development [APP-082] describes the environmental mitigation and enhancement proposed at IPS-G, differentiating between the different functions of mitigation and enhancement planting. Table 3-11 includes a description of why the area is required, e.g. the local effects that proposed planting is mitigating.

Reference	Theme	Issue raised	The Applicant's response
		effects caused by IPS-G or the pipeline on HP761033. If that is the case, Southern Water should say exactly what effect is being mitigated, where it occurs, how much mitigation is needed and why our Land has been selected. For each area of screening, landscaping, mitigation, BNG or enhancement proposed on HP761033, Southern Water should explain: • what Project effect it is intended to address and where that effect occurs; • why it needs to be on HP761033; • why the amount proposed is necessary; • what other locations have been considered; • whether it is necessary mitigation, additional enhancement or BNG; • why permanent freehold or permanent compulsory rights are needed; • why it cannot be dealt with through a voluntary land management or other agreement; • why that approach has not been discussed with us; and • how the proposal has been coordinated with the landowners and Catesby. We understand through our agent that Southern Water has indicated in relation to other affected landowners that environmental mitigation may, where appropriate, be dealt with by voluntary agreement. No comparable proposal has been put to us. If a voluntary or lesser rights solution can achieve the same result, Southern Water should explain why that has not been explored here.	
RR-061-50	Design principles	The western screening is of particular concern. Design Principle IPS-G_7 provides for woodland and scrub between the north west edge of IPS-G and the existing woodland to the west. IPS-G_8 also provides for hedgerow and a 20 metre wide band of broadleaved woodland and scrub to the south where reasonably practicable. In its current form the western planting could create a permanent barrier where access and future flexibility are important. It could restrict access towards the western lane and barns, agricultural machinery movement and future farming or development. We do not want to give up permanent control of land which may be needed for those purposes if screening can be narrowed, repositioned, designed with gaps or routes, or managed under lesser rights or agreement. If land is needed specifically to screen IPS-G, Southern Water should also explain why the screening cannot sit within or immediately around a materially smaller operational compound, or be arranged so that the western side of the holding remains usable and accessible.	Please refer to the Applicant's response to RR-061-6.

Reference	Theme	Issue raised	The Applicant's response
RR-061-51	Location of the proposed pipeline routes	4. Ground 2, pipeline alignment, northernmost reasonably practicable route Our position has consistently been that, if the pipeline has to cross HP761033, it should be moved as far north as reasonably practicable. This is not a new point raised for the Examination. Southern Water and Dalcour Maclaren's meeting minutes dated 17 May 2024 record the landowners and Catesby asking why the pipe could not be routed further north along the boundary to reduce the effect on potential development and record that the closer to the northern boundary the better. The minutes record an action to review the pipe location and provide further information. The same meeting also records the landowners and Catesby asking Southern Water to revisit a more northerly location for IPS-G. Catesby's formal July 2024 consultation response then expressly asked for the water main to be pushed as far north as possible to align with the northern boundary so far as feasible. The same point has continued to be raised through our agent and later consultation and meetings. Southern Water has referred generally to engineering, hydraulic and environmental constraints. What we still do not have is the substantive land specific technical assessment showing what northern alternatives were considered, how they were compared and what actual constraint prevents the route moving further north.	The Applicant considered the request to amend the Pipeline so that it follows the northern boundary of the field. Given the field has an irregularly shaped northern boundary, with residential gardens protruding into the field, it is not practicable to align the Pipeline to the field boundary without introducing a number of right-angled bends in the Pipeline. This would adversely impact the hydraulics of the Pipeline, requiring more energy and potentially additional pumping. As well as this, construction of the Pipeline would become closer to the rear of residential properties, potentially increasing impacts.
RR-061-52	Location of the proposed pipeline routes	A more northerly route would: • reduce severance; • reduce the amount of land affected by the easement; • reduce interference with the promoted development; • improve flexibility for future layout; • preserve access and servicing options; • reduce the number of future pipeline crossings; and • keep Southern Water's permanent infrastructure closer to the edge of the promoted site. The latest route also raises an obvious question because it appears capable of changing direction as it approaches and leaves the Land. We accept that pipeline engineering cannot be decided simply by looking at a plan. However, if the route can change direction, Southern Water should explain why that flexibility cannot be used earlier to move the route further north across HP761033.	See the Applicant's response to RR-061-51.
RR-061-53	Location of the proposed pipeline routes	If there is a genuine engineering, hydraulic, environmental, topographical or construction reason, Southern Water should identify it and provide the supporting evidence. If there is not, the pipeline should be moved north.	Please refer to the Applicant's response to RR-061-51.

Reference	Theme	Issue raised	The Applicant's response
		We ask Southern Water to set out the alternative alignments considered across HP761033, show whether the northernmost reasonably practicable route has been assessed, explain any constraint preventing further movement north, explain the changes in direction on the current route and coordinate the route and easement with the landowners and Catesby. In short, we want the pipeline to hug the northern boundary of our land.	
RR-061-54	Construction impacts and effects	5. Ground 3, construction and future access This section is about the construction access Southern Water proposes from Titchfield Lane across HP761033. We are not seeking in this representation to change Southern Water's currently proposed permanent operational access arrangements elsewhere. Southern Water proposes construction access from Titchfield Lane across HP761033 to serve the works and construction compound. Where that access is created or materially improved, we do not want it automatically closed, removed or reinstated at the end of construction without first discussing the position with the landowners and Catesby. The landowners would like the option to retain the physical access for continued farming or for incorporation into the future development of the site, subject to any necessary planning, highway and other approvals. If we choose to retain it, Southern Water's reinstatement obligations should be adjusted accordingly. Retaining the physical access must not give Southern Water any additional permanent operational access rights over HP761033 unless those rights are separately considered and agreed with the landowners and Catesby. There is also a separate access concern on the western side of the holding. The current extent of Plot 14-011 and the proposed western screening could restrict practical access towards the western lane and barns. This is important for agricultural machinery and land management and may also be important to the future development. The land take, planting and mitigation should not unnecessarily close off or narrow that access. This is one of the reasons why the amount and layout of permanent acquisition around IPS-G needs to be reduced and properly justified.	Please refer to the Applicant's responses to RR-061-9 and RR-061-6.
RR-061-55	Location of the proposed pipeline routes	6. Ground 4, pipeline easement, future rights and coordinated design The permanent pipeline easement should be limited to the minimum width genuinely required for safe operation, inspection, maintenance and replacement. Southern Water should explain the width and restrictions it is seeking and avoid restrictions which go further than needed. The easement also needs to recognise that HP761033 is an existing promoted development site. Clear future crossing rights should be available for: • roads;	The purpose of the easement is to protect the integrity and operational requirements of the pipeline and to ensure appropriate access for inspection, maintenance, repair and replacement activities. The required width has been determined following a detailed technical assessment, taking account of the pipeline's diameter, depth, construction methodology, location and operational function. For sections of pipeline installed using open-cut construction, the Applicant is seeking an easement width of 11m (5.5m either side of the pipeline). This reflects the access and operational requirements associated with maintaining and, if necessary, excavating the pipeline in the future. Notably, this represents

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		• footpaths and cycle routes; • foul and surface water drainage; • sewers; • electricity, gas, telecommunications and water services; • SuDS and other drainage infrastructure; and • other lawful development infrastructure. Southern Water's consent to crossings should be based on reasonable technical criteria and should not be unreasonably withheld or delayed. The easement should not give Southern Water an effective veto over future lawful development.	a reduction from the Applicant's published stand-off guidance for water mains of a comparable size and depth [1], which would typically require a wider protected corridor. This reduction from the normal requirement has been communicated to landowners and their agents where this is being challenged. For sections constructed using trenchless techniques, a reduced easement width is considered appropriate, taking into account depth, construction methodology and location. As the pipeline is installed at greater depth and future maintenance or operational access would be undertaken from either side of the trenchless section rather than directly above it, the same level of restriction is not required. The easement width has therefore been tailored to reflect the differing operational requirements of the construction methodologies. The Applicant is therefore satisfied that the easement widths proposed represent the minimum reasonably required to protect the pipeline and secure its safe operation over its lifetime. The reduction from the normal requirement has been communicated to landowners and their agents where this is being challenged.
RR-061-56	Location of AGP	Detailed design should be coordinated with the landowners and Catesby across drainage, attenuation, SuDS, access, roads, utilities, levels, screening, landscaping, mitigation, fencing and maintenance corridors. Where Southern Water, the landowners and Catesby may need infrastructure in the same area, the aim should be a compatible solution rather than two schemes designed separately and left to conflict later.	The Applicant will continue to engage with the landowner as the design of the Project develops following approval of the DCO application. The detailed design of IPS-G will be subject to the approval of Winchester City Council, as set out in Requirement 3 of the Draft Development Consent Order (DCO) [APP-023].
RR-061-57	Land use and agriculture	7. Ground 5, soils, agricultural land quality, drainage and future ground condition The effect of construction on soils and ground conditions needs proper protection. A photographic Schedule of Condition on its own is not enough for agricultural soil or future ground condition. The holding has been continuously farmed and cropped for more than 50 years and around three quarters is identified as Subgrade 3a Best and Most Versatile agricultural land. We have repeatedly asked for proper pre works and post works surveys at Southern Water's cost so that the condition before construction can be compared properly with the condition afterwards. The baseline should cover, as appropriate: • soil type and profile; • agricultural soil quality; • topsoil and subsoil depth; • soil structure and compaction; • drainage and infiltration;	The Applicant refers to the response to RR-061-20. Environmental Statement (ES) Appendix 12.1 Agricultural Land Quality [APP-169] identifies and characterises seven soil types throughout the Order Limits based on the analysis of 90 soil samples. Due to the temporary, short-term and very localised nature of disturbance to soils for the installation of the pipeline, a detailed pre-construction survey was not undertaken. The soil information that has been obtained has characterised the soil type and profile, the agricultural soil quality, the topsoil and subsoil depths, and soil structure and compaction. The Outline Soil Resources Management Plan (SRMP) provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and secured by Requirement 6 of the Draft DCO [APP-023] notes at paragraph B.2.16 that the Agricultural Liaison Officer (ALO) will be responsible for a number of roles, including undertaking a pre-construction Record of Condition, the coordination of drainage surveys and keeping landowners informed of pre- and post-construction drainage schemes. Measures WE4 and WE5 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) note that a Construction Drainage Plan will be prepared by the Contractor, which will be informed by baseline

Reference	Theme	Issue raised	The Applicant's response
		• levels and topography; • existing land drains; • relevant ground conditions; and • anything else reasonably required by the landowners' agronomist or technical advisers.	drainage surveys undertaken by a specialist drainage contractor, to locate drains and to ensure appropriate reinstatement.
RR-061-58	Land use and agriculture	There is already a practical example of why wet ground conditions matter. During an earlier survey visit, vehicles attending for Southern Water or its contractors became stuck in wet ground and our tenant had to pull them out. We mention this because it demonstrates the characteristics of the Land and why construction traffic, wet ground working, compaction and drainage need to be managed properly. Southern Water should agree a proper soil handling, stripping, storage and reinstatement method before works start. Topsoil and subsoil should be kept separate. Construction traffic and soil handling should be controlled so that avoidable damage is not caused, particularly during unsuitable wet conditions. After the works, equivalent surveys should be carried out using the same or a comparable method. If Southern Water's works have caused deterioration, Southern Water should put it right and fund the necessary remediation and aftercare. The surveys also provide a clear before and after record if farming losses or later development costs need to be considered.	The Outline Soil Resources Management Plan (SRMP), as contained in Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) , acknowledges that the main adverse impacts on soils during construction occur as a result of handling in inappropriate conditions, notably compaction and smearing when handling soils that are too wet. Paragraphs B.9.1 to B.9.14 of the Outline SRMP set out the methods for determining appropriate soil handling conditions and criteria for when soil handling may or may not take place and specify that soil handling should only take place in suitable soil moisture and weather conditions. The provisions of the SRMP ensure that damage to soil is avoided or minimised, and that soil structures are maintained, such that the land can be reinstated to its original use as soon as practicable following the installation of the pipeline. Good practice methodologies for soil handling, stripping, storage and reinstatement will be contained in the detailed SRMP, secured by Requirement 6 of Schedule 2 to the draft DCO [APP-023]. The Outline SRMP states that any defects identified and agreed between the landowner, Agricultural Liaison Officer (ALO) and Contractor will be ameliorated by the Contractor prior to handing back control of the land.
RR-061-59	Land use and agriculture	Agricultural quality Temporarily affected agricultural land should be returned to at least its previous agricultural quality and productive condition. We have been advised that agricultural land disturbed by major construction can take several years to return to its former productive condition. If farming suffers because of Southern Water's works, that loss should not simply be left with the landowner. This is another reason why the pre works and post works surveys matter.	The Applicant refers to the response to RR-061-58. Additionally, paragraph B.4.3 of the Outline Soil Resources Management Plan (SRMP), as contained in Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), provides for measures to ameliorate soils such that disturbed land will be reinstated to its original land quality.
RR-061-60	Construction impacts and effects	Future development and ground condition There is also a separate future development concern. Excavation, backfilling, compaction, disturbed ground, drainage changes and settlement can all affect land which may later be developed. If planning permission is obtained while Southern Water is still on the Land or after it is returned, and Southern Water's works have left ground, drainage or settlement problems which increase development costs, those additional costs should not be left with us, a future owner or developer. Southern Water should put right, or compensate for, problems caused by its works.	The Applicant acknowledges the concern regarding the potential for Project-related disturbance of ground conditions, drainage systems and land suitability to affect future use or development of land following completion of works. The likely significant effects of the Project on land quality and ground conditions have been assessed in ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1), whilst the likely significant effects on land use and agricultural interests have been assessed in ES Chapter 12 Land use and agriculture [APP-091]. These assessments take account of embedded and secured mitigation measures relating to construction practices, management of soils, protection of existing drainage systems, control of ground disturbance and reinstatement of

Reference	Theme	Issue raised	The Applicant's response
			land following construction. Following implementation of these measures, the residual effects are assessed as not significant. Following completion of the works, affected land would be reinstated in accordance with the provisions of the Draft DCO [APP-023]. The Applicant would continue to engage with affected landowners and occupiers to reduce impacts as far as reasonably practicable. The Draft DCO also includes provisions relating to the restoration of temporarily occupied land and the treatment of any loss or damage arising from the exercise of powers under the order, in accordance with the relevant provisions of the DCO and the statutory framework.
RR-061-61	Construction impacts and effects	8. Ground 6, temporary possession, compounds, haul routes and reinstatement Temporary possession, compounds, haul routes, working areas and access should be no larger, longer or more intrusive than genuinely necessary. For each temporary area affecting HP761033 Southern Water should explain: • what it is for; • how long it is needed; • the construction method; • haul routes and traffic arrangements; • how agricultural access will be maintained; • soil stripping and storage; • drainage protection; • working restrictions in unsuitable ground conditions; • reinstatement; and • aftercare.	The Scheme Development Report - 1 of 3 documents [APP-073] sets out the process that has been undertaken to locate construction compounds. This has considered the proximity to residential properties and existing commercial and agricultural uses of the land. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) includes measures to control the impact of construction compounds. The Traffic Management Strategy [APP-416] further outlines how traffic around HP761033 will be managed, particularly in Section H: Wickham to Shedfield.
RR-061-62	Landowner engagement	Any land which does not need to be owned permanently should come out of the permanent acquisition area and, if it is genuinely needed during construction, be dealt with through temporary possession or agreement. Reinstatement should not automatically mean putting every feature back exactly as it was if the landowners and Catesby reasonably want to retain an improvement created by the Project. This is particularly relevant to the Titchfield Lane construction access and could also apply to drainage or other useful infrastructure. Any land handed back should also be covered by the soil, drainage and ground condition protections set out above.	The Applicant refers to its response to RR-061-45 outlining a summary of the rights sought over the respondent's land. It remains the Applicant's firm preference to reach a voluntary agreement for the acquisition of land and rights where possible and the Applicant is willing to discuss voluntary agreement requirements further with the respondent. The Applicant will continue to engage with the respondent's land agent regarding their feedback and comments on the Heads of Terms. The Applicant most recently attended a site meeting with the respondent and their representative on the 20 October 2026 to discuss these matters further and consider how future development aspirations can be coordinated. Land would be restored to its existing condition following the installation of the pipeline in accordance with a detailed SRMP that would be prepared by the Contractor as set out in the Outline SRMP, as contained in as contained in

Reference	Theme	Issue raised	The Applicant's response
			Appendix B of the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and submitted with the DCO application. The land would therefore be farmable following reinstatement. The Outline SRMP sets the criteria for the appropriate timing, weather conditions and soil moisture conditions for handling soils, including topsoil and the appropriate plant to be used in order that the quality of topsoil and subsoil can be maintained and that the land can be fully reinstated. The construction works access has been designed as temporary with the necessary planning permission. To maintain the access after construction a separate planning application would need to be requested by the landowner to Hampshire County Council.
RR-061-63	Landowner engagement	9. Ground 7, information and engagement We want to record our serious frustration with Southern Water's engagement on HP761033. From our experience Southern Water has become a brick wall to deal with. We and our agent have repeatedly asked for the information needed to understand what is proposed, test the land and rights being sought and consider practical alternatives. Important information has often arrived late, in parts and after repeated chasing. There have been occasions when only part of the information requested has been provided, questions have not been answered in full, the response has created further questions or several months have passed before a useful answer has been received. We cannot say what happens internally within Southern Water or how the advice and feedback from Dalcour Maclaren, affected landowners and their professional agents is dealt with. What we can say is that obtaining substantive answers and decisions has been extremely difficult. We do not know whether the points being raised are not reaching the relevant decision makers or are simply not being acted upon. Either way, the result for us has been the same.	Please refer to the Applicant's response to RR-061-12.
RR-061-64	Consultation	This concern is reinforced by Dalcour Maclaren itself acknowledging on 24 July 2026 that a number of queries were still outstanding and that Southern Water's Project team had been chased. Our concern is that, despite years of engagement through Southern Water's own land agents, basic land specific questions remain unresolved. We and Catesby have also asked for feedback on the consultation representations made. None has been provided. We have been told Southern Water is not obliged to give individual feedback. The practical problem is that we still do not know whether important points we raised were accepted, considered or rejected and, if rejected, why. That makes it harder to understand Southern Water's position and work towards agreement.	The Applicant has had regard to all feedback made at consultations and during engagement outside of the consultation periods. Feedback was reviewed by subject matter experts to consider whether it would be reasonable and practicable to implement amendments to the design of the Project as suggested by feedback. The process the Applicant undertook to develop the design of the Project is set out in the Scheme Development Report [APP-073, APP-074, APP-075]. The consideration of relevant responses received to consultation and publicity has been set out in the following locations: • Summer 2024 Consultation o Section 9.7 of the Consultation Report [APP-029]; and o Appendix F.29 (The Applicant's response to feedback) [APP-047]

Reference	Theme	Issue raised	The Applicant's response
			• Spring 2025 Consultation o Section 10.7 of the Consultation Report [APP-029]; and o Appendix G.25 (The Applicant's response to feedback) [APP-050] • Autumn 2025 Consultation o Section 11.7 of the Consultation Report [APP-029]; and o Appendix H.9 (The Applicant's response to feedback) [APP-051] • Spring 2026 Consultations o Section 12.7 of the Consultation Report [APP-029]; and o Appendix I.13 (The Applicant's response to feedback) [APP-052] In addition, the Applicant wrote to the respondent and their land agent on 11 December 2025 to provide an individual response to their feedback on the Summer 2024 and Spring 2025 Consultations. The Applicant reviewed the correspondence with the respondent on 24 July 2026. An email was sent on that date to provide answers to queries relating to survey access and data, as well as a separate email on a compensation claim. Whilst the Applicant noted in that email that there were outstanding queries, it subsequently responded to those queries and provided the relevant data in the same correspondence. The Applicant considers that these matters have since been resolved.
RR-061-65	Location of AGP	Information still outstanding or not properly explained The matters which have been outstanding for significant periods, supplied only in stages or remain insufficiently explained include: • detailed IPS-G plans and the actual permanent land requirement for IPS-G; • the area by area justification for Plot 14-011; • scaled pipeline and easement information, route evolution and the technical assessment of a more northerly pipeline route; • compounds, haul routes and construction arrangements; • screening, landscaping, biodiversity and environmental mitigation, including what effects any mitigation is intended to address; • access arrangements, including the Titchfield Lane construction access and the effect of the western land take and planting on access towards the lane and barns; • drainage and the interaction with the future Catesby development;	The detailed design of IPS-G has not been developed yet, and will be undertaken following approval of the DCO application. The detailed design of IPS-G will be subject to the approval of Winchester City Council, as set out in Requirement 3 of the Draft DCO [APP-023]. Outside of the maximum footprint of the IPS-G site (Work No. 5B) the Applicant requires land for access and drainage works and environmental mitigation works. The environmental mitigation works are required to provide visual screening of views from residential properties and improve ecological connectivity. The Applicant considered the request to amend the Pipeline so that it follows the northern boundary of the field. Given the field has an irregularly shaped northern boundary, with residential gardens protruding into the field, it is not practicable to align the Pipeline to the field boundary without introducing a number of right-angled bends in the Pipeline. This would adversely impact the hydraulics of the Pipeline, requiring more energy and potentially additional pumping. As well as this, construction of the Pipeline would become closer to the rear of residential properties, potentially increasing impacts. Sheet 14 and 15 of the Works Plans – 2 of 3 documents [AS-008] shows the location of construction compounds in this location.

Reference	Theme	Issue raised	The Applicant's response
		• the pre works and post works soil and agronomic surveys, methodology and baseline information which we have requested over a prolonged period; • tree and Arboricultural constraints information, some of which was later supplied; and • clear definitions of the permanent rights, easements and restrictions being sought.	The drainage for IPS-G has not yet been designed in detail. The DCO application includes a Sustainable Drainage Systems Strategy, which forms part of ES Appendix 19.1 Flood Risk Assessment 8 of 8 documents [APP-196]. Requirement 15 of the Draft DCO [APP-023] sets out that the development of IPS-G may not commence until details of the proposed surface water drainage have been submitted to and approved by the relevant planning authority in consultation with the lead local flood authority and the Environment Agency, and that the surface water drainage must be substantially in accordance with the sustainable drainage systems strategy set out in ES Appendix 19.1 Flood Risk Assessment 8 of 8 documents [APP-196]. The Applicant notes the comment. ES Appendix 12.1 Agricultural Land Quality [APP-169] identifies the distribution of agricultural land quality within the Order Limits, including areas of Subgrade 3a Best and Most Versatile agricultural land. The effects of the Project on agricultural land resources are assessed in ES Chapter 12 Land Use and Agriculture [APP-091], which considers both temporary and permanent land requirements and identifies mitigation measures to minimise effects and facilitate reinstatement of affected land following construction. The DCO application includes plans of the trees within and adjacent to the Order Limits. This is set out in ES Appendix 13.5 Arboricultural Impact Assessment [APP-175, APP-176]. The Applicant has responded on the point regarding the land and rights required in RR-061-45. The extent of the rights, easements and restrictions over land will be confirmed once the detailed design of the Project has been developed following approval of the DCO application.
RR-061-66	Landowner engagement	Changed plans and the meeting suggested in late 2025 On one occasion we and our agent attended a meeting having prepared on the basis of plans supplied in advance. During the meeting Dalcour Maclaren presented materially revised information affecting the land take and/or screening and explained that it had only recently received that information from Southern Water. We had therefore prepared using information which had already been superseded. We are not alleging deliberate withholding. The point is that late changes of this kind make proper, informed negotiation much harder and cause time to be spent reviewing positions which have already changed.	The Applicant has sought to provide information on the Project as it has evolved but acknowledges that there have been changes to the layout of the proposal throughout pre-application and ahead of DCO submission. This has been as a result of the survey data obtained, refinement to project requirements and the consultation process. The Scheme Development Report [APP-073, APP-074 and APP-075] sets out the process that was undertaken to select the pipeline routes, construction compounds and AGP sites.
RR-061-67	Landowner engagement	In late 2025 Southern Water itself suggested a further meeting to go through the plans in more detail. We did not refuse the meeting. We explained that, for it to be meaningful, we first needed the outstanding information and answers already requested. In particular, we needed to understand the actual amount of permanent land Southern Water says it requires for IPS-G and the basis for the proposed pipeline route across HP761033. That information was not	The Applicant notes this comment and as above, has sought to provide information on the Project as it has evolved but acknowledges that there have been changes to the layout of the proposal throughout the Project and ahead of DCO submission.

Reference	Theme	Issue raised	The Applicant's response
		provided and Southern Water did not then arrange the meeting. Those same fundamental questions remain unresolved today.	Please refer to the Applicant's response to RR-061-45 for a summary of the rights sought over the respondent's land and corresponding works requirements. It remains the Applicant's firm preference to reach a voluntary agreement for the acquisition of land and rights where possible and the Applicant is willing to discuss voluntary agreement requirements further with the respondent. The Applicant will continue to engage with the respondent's land agent regarding their feedback and most recently attended a site meeting with the respondent and their representative on the 20 October 2026, with responses to the respondent's outstanding queries provided via email on the 13 October ahead of this meeting.
RR-061-68	Landowner engagement	Our willingness to engage and allow surveys The present lack of agreement is not because we have refused to engage. Our own contemporaneous time record starts in December 2021. Since then we have attended meetings, responded to correspondence, reviewed changing plans, instructed a professional land agent and other advisers, involved Catesby, provided information and repeatedly put forward practical alternatives.	The Applicant notes this comment and is grateful for the respondent's engagement to date.
RR-061-69	Landowner engagement	We also allowed the survey access requested of us over a prolonged period. We understand that survey access was not granted by all affected landowners. We continued to cooperate while trying to obtain the information needed to understand and assess the Project on our Land. During one survey visit vehicles attending for Southern Water or its contractors became stuck in wet ground and our tenant had to pull them out. The soils section explains why that experience is also relevant to wet ground working, compaction, drainage and reinstatement.	The Applicant notes this comment and is grateful for the respondent's cooperation with surveys to date. The Applicant confirms that a compensation claim was received and settled for the incident referenced in the response.
RR-061-70	Landowner engagement	Heads of Terms and meaningful negotiation Southern Water issued populated Heads of Terms on 7 May 2026. Receipt of those Heads of Terms does not mean that substantive negotiations have started. From our perspective no substantive Heads of Terms negotiations have taken place.	Please refer to the Applicant's response to RR-061-13.
RR-061-71	Landowner engagement	The issue is not simply the price or wording of the Heads of Terms. Before we can sensibly negotiate the proposed freehold acquisition and easements, Southern Water needs to establish and justify what land and rights it actually needs. We still dispute the amount of permanent freehold land, the pipeline position, access, mitigation, easement terms and other matters set out in this representation. We remain willing to negotiate, but Southern Water first needs to provide the outstanding information, properly answer the alternatives we have raised and be willing to discuss changes to the land and rights being sought.	Please refer to the Applicant's response to RR-061-45 for a summary of the rights sought over the respondent's land, easement terms and corresponding works requirements. The Applicant has also responded on the queries regarding the land required for the IPS G site, including crossings, roads, drainage, SuDs and utilities in RR-061-2. Finally, the Applicant has provided a response on the screening and mitigation required in RR-061-5. The Applicant also refers to the response to RR-061-14 and confirms it remains the firm preference to reach a voluntary agreement for the acquisition of land and rights where possible and the Applicant is willing to discuss voluntary agreement requirements further with the respondent. The Applicant

Reference	Theme	Issue raised	The Applicant's response
			will continue to engage with the respondent's land agent regarding their feedback and most recently attended a site meeting with the respondent and their representative on the 20 October 2026, with responses to the respondent's outstanding queries provided via email on the 13 October ahead of this meeting.
RR-061-72	Landowner engagement	Land and Rights Negotiations Tracker We are particularly concerned about Southern Water's published Pre-application Land and Rights Negotiations Tracker, Document 4.4. It does not accurately reflect reality and we want it corrected urgently.	Please refer to the Applicant's response to RR-061-13.
RR-061-73	Landowner engagement	Southern Water's own Status Key says that yellow means 'Heads of Terms negotiations ongoing'. HP761033 is shown as yellow. However, Southern Water's entry says that populated Heads of Terms were issued on 7 May 2026 and that it is awaiting comments following confirmation of receipt by our representative. From our perspective no substantive Heads of Terms negotiations have started. Receiving Heads of Terms is not the same as negotiating or agreeing them.	Please refer to the Applicant's response to RR-061-13.
RR-061-74	Landowner engagement	Fundamental matters remain unresolved, including the actual amount of permanent land required for IPS-G, why such a large area is said to require freehold acquisition, the pipeline alignment, access, screening and environmental mitigation, easement terms and future crossing rights, the pre works and post works soil and agronomic surveys, drainage and reinstatement.	Please refer to the Applicant's response to RR-061-45 for a summary of the rights sought over the respondent's land, easement terms and corresponding works requirements. The Applicant has also responded on the queries regarding the land required for the IPS G site, including crossings, roads, drainage, SuDs and utilities in RR-061-2. Finally, the Applicant has provided a response on the screening and mitigation required in RR-061-5. It remains the Applicant's firm preference to reach a voluntary agreement for the acquisition of land and rights where possible and the Applicant is willing to discuss voluntary agreement requirements further with the respondent. The Applicant will continue to engage with the respondent's land agent regarding their feedback and most recently attended a site meeting with the respondent and their representative on the 20 October 2026, with responses to the respondent's outstanding queries provided via email on the 13 October 2026 ahead of this meeting. The Applicant confirms that commitments relating to reinstatement, soil surveys and drainage can be found within Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), as secured by Requirement 6 of the Draft Development Consent Order [APP-023].
RR-061-75	Landowner engagement	Southern Water also states in the Tracker that it is 'confident the necessary land and rights can be acquired by voluntary agreement'. We do not understand the basis for that confidence when substantive Heads of Terms negotiations have not started and the amount, position and form of the land and rights remain disputed.	Please refer to the Applicant's response to RR-061-13.

Reference	Theme	Issue raised	The Applicant's response
RR-061-76	Landowner engagement	The Tracker should therefore be corrected urgently so that the public Examination record reflects the actual position and why agreement has not been reached. It should record that no substantive Heads of Terms negotiations have yet taken place, important information and responses remain outstanding, fundamental matters remain disputed and no agreement has been reached on the principal land or rights sought over HP761033. Southern Water should also explain the basis for its statement that it is confident voluntary agreement will be reached.	Please refer to the Applicant's response to RR-061-13.
RR-061-77	Landowner engagement	Outstanding time and expenses The landowners and their professional advisers have spent considerable time dealing with Southern Water's proposals over a number of years. The work has included meetings, correspondence, reviewing changing plans, survey access, chasing information and putting forward alternatives intended to reduce the effect of the Project on HP761033. At a face to face meeting we were told to submit the time we had spent dealing with the Project. Our own time record starts in December 2021 and we submitted a landowner time and expenses claim in 2025. It remains unresolved and should now be dealt with promptly. It is separate from our substantive objections to the land and rights, but it forms part of the wider history of our engagement.	Please refer to the Applicant's response to RR-061-13.
RR-061-78	Landowner engagement	Information and alternatives schedule Southern Water should now provide a clear schedule showing: • the information requested by the landowners and their agent; • what has been supplied and what remains outstanding; • when anything still outstanding will be supplied; • the alternatives we have put forward; • whether each alternative has actually been assessed and the result; and • where an alternative has been rejected, the reason for rejecting it. That schedule should be reflected accurately in the Land and Rights Negotiations Tracker. The Examining Authority should be able to see not simply that agreement has not been reached, but why it has not been reached.	The Applicant notes this comment and would welcome the opportunity to discuss these matters further with the respondent.
RR-061-79	Landowner engagement	10. Ground 8, compulsory acquisition, practical protections and funding Southern Water is seeking extensive compulsory powers over HP761033. We are not saying it can never acquire land or rights needed to deliver the Project. Our point is that it should have to show, plot by plot and where necessary area by area, that what it wants is genuinely needed and no more extensive than reasonably required.	Please refer to the Applicant's response to RR-061-45 for a summary of the rights sought over the respondent's land and corresponding works requirements. It remains the Applicant's firm preference to reach a voluntary agreement for the acquisition of land and rights where possible and the Applicant is willing to discuss voluntary agreement requirements further with the respondent. The Applicant will continue to engage with the respondent's land agent regarding

Reference	Theme	Issue raised	The Applicant's response
			their feedback and is seeking a meeting with the respondent to discuss these matters further.
RR-061-80	Landowner engagement	Permanent ownership should not be used simply because it is easier or gives Southern Water more flexibility if a lesser interest, temporary possession or agreement would do the job.	Please refer to the Applicant's response to RR-061-45.
RR-061-81	Planning/Scheme development	This is particularly important because of the 22,643 sq m outside the maximum final IPS-G fence, the amount of Subgrade 3a land affected, more than 50 years of farming, the Catesby promotion, the unresolved screening and mitigation, the western access concern, the northerly pipeline request, the permanent easement and the continuing gaps in information.	The Applicant acknowledges the concerns raised regarding the effect of the Project on Subgrade 3a Best and Most Versatile agricultural land, the continued agricultural use of the holding and measures for soil management and reinstatement following construction. In relation to concerns regarding access, screening and environmental mitigation, the Applicant refers the respondent to RR-061-6, RR-061-45, RR-061-49, RR-061-50 and RR-061-55. Concerns relating to future development coordination are addressed in RR-061-19 and RR-061-43. ES Appendix 12.1 Agricultural Land Quality [APP-169] identifies the distribution of agricultural land quality within the Order Limits, including areas of Subgrade 3a Best and Most Versatile agricultural land. The effects of the Project on agricultural land resources, including permanent and temporary land requirements, are assessed in ES Chapter 12 Land use and agriculture [APP-091]. The process for locating IPS-G and the Pipeline considered potential effects on Best and Most Versatile agricultural land alongside engineering, environmental and community considerations, as set out in the Scheme Development Report – [APP-073 to APP-075 – 3 documents]. For agricultural land temporarily affected during construction, soil handling and reinstatement will be managed in accordance with the Outline Soil Resources Management Plan contained in Appendix B of the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), secured in Requirement 6 of the Draft Development Consent Order [APP-023]. This includes controls relating to soil moisture and weather conditions, soil stripping, separate storage of topsoil and subsoil, compaction, drainage, reinstatement and monitoring. The Agricultural Liaison Officer will also prepare a pre-construction Record of Condition, undertake inspections during construction and discuss reinstatement measures with the landowner or occupier. Any defects identified and agreed between the landowner, Agricultural Liaison Officer and Contractor will be addressed before control of the land is returned. The detailed Soil Resources Management Plan will be prepared and implemented by the Contractor in accordance with the Outline Soil Resources Management Plan. Temporarily affected agricultural land will be reinstated to its original land quality, as far as reasonably practicable.

Reference	Theme	Issue raised	The Applicant's response
RR-061-82	Landowner engagement	If the DCO is made, the practical protections we want include: • permanent acquisition limited to the minimum land genuinely required for IPS-G; • temporary possession, defined rights or agreement instead of freehold wherever that will do the job; • proper coordination with the landowners and Catesby before detailed design is fixed; • the pipeline following the northernmost reasonably practicable route; • easement widths and restrictions kept to the minimum necessary; • clear future crossing rights and reasonable consent procedures; • no unnecessary sterilisation of the promoted development; • screening and mitigation designed so that western access, farming and future development remain practical; • voluntary mitigation arrangements used where reasonably practicable; • additional environmental enhancement not acquired compulsorily solely for enhancement; • drainage, SuDS and other overlapping infrastructure coordinated with the landowners and Catesby; • proper pre works and post works soil, agronomic, drainage, topographical and ground surveys at Southern Water's cost; • full remediation and aftercare where the works cause deterioration; • the option for the landowners to retain the physical Titchfield Lane construction access if they wish, without creating additional permanent Southern Water rights unless separately agreed; • tightly defined maintenance and access rights; and • protections which continue to apply if Southern Water transfers relevant rights or responsibilities to another party.	The Applicant notes this summarising comment which has been responded to throughout this document and would welcome the opportunity to discuss these matters further with the respondent.
RR-061-83	Project finance and cost	Funding Statement Southern Water's Funding Statement, APP-026, Document 4.2, says the Project estimate includes land acquisition and identified compensation costs and refers to an allowance for Project land costs. Given the extent of permanent acquisition and rights sought over HP761033 and the existing Catesby promotion, we ask Southern Water to confirm that its Project estimate and land cost allowance fully reflect the promoted status of the Land and are adequate for the compensation consequences of the powers sought, including effects on retained land where applicable.	The Funding Statement (Document reference 4.2, DCO Volume 4, Version 1) demonstrates that the necessary funding for the Project can be secured. As part of the preparation of the Funding Statement (Document reference 4.2, DCO Volume 4, Version 1), the potential land acquisition and compensation costs were assessed by a Chartered Surveyor from the property specialist firm Dalcour Maclaren in the form of a Property Cost Estimate. As part of this exercise, the private loss of each landowner and occupier was considered and factored into the overall Property Cost Estimate..

Reference	Theme	Issue raised	The Applicant's response
RR-061-84	Project finance and cost	We are not asking the Examining Authority to decide compensation values and we do not rely on confidential valuation material here. The point is simply that Southern Water should be able to show that the Project is funded for the lawful consequences of the powers it is asking for.	Through the funding structure outlined in the Funding Statement (Document reference 4.2, DCO Volume 4, Version 1) the Applicant is satisfied that the required funding is already available to secure the land and rights required for the delivery of the Project.
RR-061-85	Landowner engagement	11. Summary of requests 1. Reduce and justify the IPS-G land take. Explain, area by area, why Plot 14-011 requires 29,633 sq m of permanent freehold when the maximum final fenced IPS-G footprint is 6,990 sq m, and remove from permanent freehold any land Southern Water cannot show is genuinely required.	Please refer to the Applicant's response to RR-061-45.
RR-061-86	Location of the proposed pipeline routes	2. Move the pipeline north. Move the pipeline to the northernmost alignment across HP761033 and make it hug the northern boundary of our land.	Please refer to the Applicant's response to RR-061-51.
RR-061-87	Location of the proposed pipeline routes	3. Explain the pipeline route. Identify the alternatives considered and explain why the route can change direction but cannot move further north earlier if that remains Southern Water's position.	The Pipeline can change direction, however the more changes in direction the Pipeline has to make, the greater the pumping requirements which increases the energy needed and potential may necessitate additional pumping infrastructure. Therefore, avoiding changes is direction is preferred. Given this land is not subject to an approved or live planning application and is not allocated in an adopted or emerging local plan it is not considered appropriate to introduce multiple changes of direction in this location.
RR-061-88	Design of AGP	4. Separate operational land from screening, mitigation and enhancement. Identify what each area is for, what effect any mitigation addresses, whether any part is enhancement or BNG and why freehold rather than rights, temporary possession or agreement is needed.	Table 3-11 in ES Chapter 3 Description of the Proposed Development [APP-082] sets out the locations where environmental mitigation and enhancement is proposed, differentiating between mitigation and enhancement planting in each of the Environmental Mitigation and Enhancement Areas. Table 3-11 includes a description of what each area is for and why it is required (e.g. the effect that is mitigated). All planting with a screening function is identified as mitigation. The Applicant confirms that compulsory acquisition powers are sought in respect of all interests (including freehold) as shown edged black and shaded pink on the Land Plans (Document reference 2.2, DCO Volume 2, Version 1) in connection with Works No.5B shown on the Works Plans [AS-008]. The nature and extent of the works, including the permanent change of land use from its current agricultural purpose, together with the Applicant's requirement to exercise ongoing control over the land and restrict access to authorised personnel, are incompatible with continued use by the current landowners. On this basis, the acquisition of the freehold is necessary, proportionate and justified. It remains the Applicant's firm preference to reach a voluntary agreement for the acquisition of land and rights where possible and the Applicant is willing to discuss voluntary agreement requirements further with the respondent. The Applicant will continue to engage with the respondent's land agent regarding

Reference	Theme	Issue raised	The Applicant's response
			their feedback and comments on the Heads of Terms. The Applicant is seeking a meeting with the respondent to discuss these matters further.
RR-061-89	Landowner engagement	5. Protect the existing promoted development. Recognise the pre existing Catesby promotion, take account of Catesby's successive layouts showing reduced development capacity as Southern Water's proposals have been accommodated, and work with the landowners and Catesby to minimise further avoidable loss, sterilisation and restriction of the Land.	Please refer to the Applicant's response to RR-061-19.
RR-061-90	Landowner engagement	6. Work directly with the landowners and Catesby. Coordinate IPS-G, pipeline alignment, easements, access, roads, crossings, drainage, SuDS, levels, utilities, screening, landscaping, mitigation, temporary works and reinstatement before avoidable constraints are fixed.	Please refer to the Applicant's response to RR-061-19.
RR-061-91	Construction impacts and effects	7. Protect the Titchfield Lane construction access. Do not automatically remove or reinstate the physical access created or improved for construction. Give the landowners the option to retain it for farming or future development, without creating any additional permanent Southern Water operational rights unless separately agreed.	Please refer to the Applicant's response to RR-061-9.
RR-061-92	Location of the proposed pipeline routes	8. Protect the western boundary and access. Reduce, reposition or redesign western planting and land take so that access towards the lane and barns, agricultural machinery movement and future use are not unnecessarily blocked.	Please refer to the Applicant's response to RR-061-6.
RR-061-93	Location of the proposed pipeline routes	9. Minimise the easement and protect future crossings. Keep the easement and restrictions to what is genuinely needed and ensure roads, drainage, services, utilities and other future development infrastructure can cross subject to reasonable technical requirements.	The Applicant has responded on the point regarding the land and rights required in RR-061-45. The extent of the rights, easements and restrictions over land will be confirmed once the detailed design of the Project has been developed following approval of the DCO application.
RR-061-94	Location of AGP	10. Explain the IPS-F comparison. Give the site specific reason why IPS-G requires about 8,688 sq m more permanent freehold than IPS-F when their maximum final fenced footprints differ by only 665 sq m.	Please refer to the Applicant's response to RR-061-3.
RR-061-95	Landowner engagement	11. Use agreement or lesser rights for mitigation where possible. Where mitigation is genuinely needed, explain why it has to be on HP761033, why that amount is needed and why a less intrusive interest or voluntary agreement will not work. If it deals with effects elsewhere in the Project, identify those effects and where they arise.	The environmental works proposed as part of the wider IPS-G site (Work No. 5B) are required to mitigate adverse impacts associated with the IPS-G development. Table 3-11 in ES Chapter 3 Description of the Proposed Development [APP-082] describes the environmental mitigation and enhancement proposed at IPS-G, differentiating between the different functions of mitigation and enhancement planting. Table 3-11 includes a description of why the area is required, e.g. the local effects that proposed planting is mitigating.

Reference	Theme	Issue raised	The Applicant's response
			Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors that the Applicant considers that the conditions in section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance, have been satisfied. As detailed within the Statement of Reasons [APP-025], temporary possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation and construction works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the Project. Section 5.3.2 of the Statement of Reasons [APP-025] confirms that the Applicant has only included powers to compulsorily acquire the freehold interest in land where the acquisition of rights or taking of temporary possession would not be sufficient or appropriate to enable the construction, operation or maintenance of the Project. The Applicant refers to the response in RR-061-45 which clarifies where the requirement for permanent acquisition of the freehold is required and why permanent rights and temporary possession are insufficient for the operational requirements.
RR-061-96	Planning/Scheme development	12. Protect Best and Most Versatile agricultural land and the long established farm. Explain, by reference to NPS paragraphs 4.10.14 and 4.10.25, how impacts on Subgrade 3a land have been minimised, why poorer quality land has not been used where possible and how more than 50 years of productive farming will be protected.	Paragraph 4.10.14 of the National Planning Statement (NPS) for water resources infrastructure (2025) refers to minimising impacts on Best and Most Versatile (BMV) agricultural land and where significant development is necessary, to use poorer quality grades where possible. The land affected by the Pipeline will be subject to short-term, temporary disturbance, before being reinstated to its existing condition. The Applicant does not consider that this represents significant development in terms of loss of agricultural land. Paragraph 4.10.25 indicates that the Secretary of State will take into account the economic and other benefits of BMV agricultural land, and ensure the applicant has put forward appropriate mitigation measures to minimise impact on soil resources. The Applicant confirms that the use of the agricultural land for the Pipeline will be short-term and temporary, and that appropriate mitigation measures to minimise impacts on soils are contained in the Outline Soil Resources Management Plan (SRMP) contained in Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), secured in Requirement 6 of the Draft DCO [APP-023]. The Scheme Development Report [APP-073 to APP-075 – 3 documents] and Environmental Statement (ES) Chapter 4 Consideration of alternatives [APP-083] provide the detailed process the Applicant has followed in evaluating alternatives to the Project. As stated in paragraph 4.5.20 of ES Chapter 4 Consideration of alternatives: *The evaluation also considered the impact on best and most versatile agricultural land as development of the AGP could result in the permanent loss of agricultural land, dependent on their final location. Impacts on best and most versatile agricultural land were not considered for the development of pipelines as it was assumed that agricultural land could be reinstated following the completion of construction works.*

Reference	Theme	Issue raised	The Applicant's response
			As noted in response to RR-061-86, the Applicant considered the request to amend the Pipeline so that it follows the northern boundary of the field. Given the field has an irregularly shaped northern boundary, with residential gardens protruding into the field, it is not practicable to align the Pipeline to the field boundary without introducing a number of right-angled bends in the Pipeline. This would adversely impact the hydraulics of the Pipeline, requiring more energy and potentially additional pumping. As well as this, construction of the Pipeline would become closer to the rear of residential properties, potentially increasing impacts.
RR-061-97	Landowner engagement	13. Coordinate overlapping infrastructure requirements. Make sure Southern Water's access, drainage, SuDS, utilities, screening, landscaping and mitigation do not prevent an efficient future Catesby solution and are designed compatibly where possible.	Please refer to the Applicant's response to RR-061-19. The Applicant has also responded on the queries regarding the land required for the IPS G site, including crossings, roads, drainage, SuDs and utilities at RR-061-2. Finally, the Applicant has provided a response on the screening and mitigation required in RR-061-5. The Applicant most recently attended a site meeting with the respondent and their representative on the 20 October 2026 to discuss these matters further and consider how future development aspirations can be coordinated.
RR-061-98	Land use and agriculture	14. Undertake proper pre works and post works surveys. Carry out soil, agronomic, drainage, topographical and relevant ground condition surveys at Southern Water's cost using a method which allows a proper before and after comparison and provides a clear record if loss, remediation or additional costs later need to be considered.	Refer to responses to RR-61-10, RR-61-11 and RR-061-20.
RR-061-99	Construction impacts and effects	15. Protect soil quality and wet ground conditions. Prevent soil mixing, compaction, drainage damage and avoidable wet ground damage, taking account of the practical ground conditions already experienced during survey work. Agricultural land disturbed by the works may take several years to return to its former productive condition. If farming suffers because of Southern Water's works, Southern Water should put it right or properly deal with the resulting loss.	The Applicant recognises the importance of protecting soil resources, maintaining agricultural land quality and avoiding unnecessary damage to land drainage systems during construction. The likely significant effects of the Project on land use and agriculture during construction, operation and decommissioning have been assessed in ES Chapter 12 Land use and agriculture [APP-091]. Such measures are secured through the DCO [APP-023] and would be implemented through an Outline Soil Resource Management Plan (SRMP) prepared in accordance with the Outline SRMP appended to the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). The Outline SRMP sets out the approach to soil management and reinstatement to support the preservation of soil quality and the restoration of land following completion of the works.
RR-061-100	Construction impacts and effects	16. Protect future ground conditions. If planning permission is obtained while Southern Water is still on the Land or after it is returned, do not leave us, a future owner or developer with additional development costs caused by Project related ground, drainage or settlement problems. Southern Water should put right, or compensate for, problems caused by its works.	Please refer to the Applicant's response to RR-061-60.

Reference	Theme	Issue raised	The Applicant's response
RR-061-101	Location of the proposed pipeline routes	17. Justify temporary possession and construction areas. Reduce compounds, haul routes, working areas and temporary rights to what is genuinely necessary and explain their purpose, duration, working methods and reinstatement.	The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The Project limits and parameters set out in the DCO application provide flexibility for the detailed design to be delivered within these parameters by the Contractor once appointed. This approach ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-061-102	Landowner engagement	18. Provide the outstanding information and answer alternatives properly. Provide complete land specific information, set out what remains outstanding, identify each substantive alternative we have proposed, confirm whether it was assessed and give the reason for any rejection.	The Applicant notes this comment and would welcome the opportunity to discuss these matters further with the respondent. The Applicant is seeking to engage with the respondent's land agent to clarify what remains outstanding, so that information can be provided or DCO application documents can be signposted.
RR-061-103	Landowner engagement	19. Correct the Land and Rights Negotiations Tracker urgently. The published Tracker does not accurately reflect reality. It should record that no substantive Heads of Terms negotiations have yet taken place, identify the outstanding information and alternatives, record the fundamental matters which remain disputed, including land take, pipeline alignment, access, mitigation, easement terms and pre works and post works soil and agronomic surveys, and record that no agreement has been reached. Southern Water should also explain the basis for saying it is confident the necessary land and rights can be acquired voluntarily.	Please refer to the Applicant's response to RR-061-13.
RR-061-104	Landowner engagement	20. Demonstrate the need for compulsory acquisition and adequate funding. Show that the land and rights sought are no more than reasonably required, that reasonable alternatives and acquisition by agreement have genuinely been explored, and confirm that APP-026 and the Project land cost allowance properly reflect the promoted status of HP761033 and the compensation consequences of the powers sought.	Please refer to the Applicant's responses to RR-061-2, RR-061-3 and RR-061-14.
RR-061-105	Landowner engagement	21. Settle the outstanding time and expenses claim. At a face to face meeting we were told to submit the time we had spent dealing with the Project. We did so. The landowner time and expenses claim submitted in 2025 remains unresolved and should now be dealt with promptly.	Please refer to the Applicant's response to RR-061-38.

Table 2-10 The Applicant's response to RR-063 from Conrad Energy

Reference	Theme	Issue raised	The Applicant's response
RR-063-1	Principle of development	With regards to Plot 15-013, this is subject to the permanent acquisition of rights. Conrad Energy have planning consent to install a 49.9MW solar farm, which includes this plot. Conrad have a signed option over the plot and an accepted grid offer with SSE to connect and energise the solar farm once installed. We formally object to the proposals in the current form.	The Applicant acknowledges the interface with the recently approved solar development at land to the north of Blind Lane, and will continue engagement with the developer to reduce conflicts between the two developments. The Applicant has considered various options for the Pipeline in this location and considers the land to the north of Blind Lane to be the optimal location, taking into account a range of technical and environmental criteria.
RR-063-2	Principle of development	Planning was consented for Conrad's solar farm in Wickham on 25/09/2025. Planning reference 24/02804/FUL. Conrad have an accepted 49.9MW grid offer with SSE. Conrad submitted the Wickham solar farm project into the NESO grid reform process last summer and we currently await notification of our confirmed grid connection date, which is due to be confirmed in the coming months. Once the date is received, Conrad will be financially and legally committed to meet strict milestones to ensure the connection date is met.	
RR-063-3	Landowner engagement	Conrad have a signed option agreement with the landowner, with option fees already paid and annual payments ongoing. The lease will be entered once the project is ready to build, in line with the grid connection date.	The Applicant confirms it has included the respondent's interest within the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1). The Applicant has requested details of the option agreement and any subsequent lease to better understand the associated land interests.
RR-063-4	Cumulative effects	Once installed, the Wickham solar farm will be in operation for 40 years, generating enough renewable energy to power the equivalent of approximately 18,000 homes, with the energy generated by the solar farm feeding directly into the grid.	The Applicant acknowledges the nature and scale of the approved solar development at land north of Blind Lane, and will continue engagement with the developer to reduce conflicts between the two developments. The development is contained in Environmental Statement (ES) Appendix 20.1 List of 'other developments' – longlist and shortlist [APP-208] as a project on the longlist, but it was not shortlisted for assessment in the Cumulative Effects Assessment (CEA) [APP-209] on the basis there wasn't the potential for significant cumulative effects based on the consideration of the shortlisting criteria set out in Table 20-10 in ES Chapter 20 Cumulative and in-combination effects [APP-099].
RR-063-5	Location of the proposed pipeline routes	The proposed route of the Hampshire Water Transfer and Water Recycling Project (Plot 15-013) goes through a section of a parcel of land which Conrad have under option and have planning consent to build the solar farm. The route of the pipe, if consented, would result in a significant loss of solar panels in that area, resulting in a significant loss of revenue over the 40 year operational life. Due to the route of the pipe, it would also result in the sterilisation of the remaining triangle of land to the east of the proposed water pipe route where solar panel would also be installed, resulting in further loss of solar panels, and therefore loss of revenue through lost generation. The overall financial losses to Conrad due to lost generation would be very significant.	The Applicant acknowledges the interface with the approved solar development at land to the north of Blind Lane, and will continue engagement with the developer to reduce conflicts between the two developments. The Applicant notes that the pipeline would intersect a relatively small section of overall solar development site. The Applicant has considered various options for the Pipeline in this location, considers the land to the north of Blind Lane to be the optimal location, considering a range of technical and environmental criteria. Further site specific assessments would be required to determine what works could take place within the Pipeline's easement. Any works within the easement area would need to comply with the relevant easement

Reference	Theme	Issue raised	The Applicant's response
			requirements and be agreed through the appropriate land and technical approval processes. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions.
RR-063-6	Location of the proposed pipeline routes	The installation of the Wickham solar farm is likely to commence, and potentially be fully installed, before the WTWRP. To accommodate the WTWRP, Conrad would either need to sacrifice the whole area of land where solar was intended to be installed, to enable the installation of the water pipe at a later date, or else fully install and then remove the section of the solar installation at a later date to enable the WTWRP installation. Both options will have very significant financial and practical implications for Conrad Energy.	The Applicant confirms that it has engaged and will continue to engage with the respondent regarding the interaction between their solar development and the Project in an endeavour to mitigate impacts and address the concerns raised in their relevant representation. The Applicant has held several meetings with the respondent on the 24th November 2025, 20th April 2026, 22nd June 2026 and has set up a recurring bi-monthly meeting with the respondent to allow the opportunity for continued engagement between the two projects. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in accordance with the Compensation Code and relevant statutory provisions. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits, while retaining suitable flexibility until the detailed design has been confirmed. The Applicant would only exercise compulsory acquisition and temporary use powers over land actually required to deliver the authorised development.
RR-063-7	Location of the proposed pipeline routes	On other practical points, the WTWRP route goes through Conrad's consented construction and operational access for the whole parcel of land in question, as well as over the consented location of the MV substation and transformers. Moving the access point to enable access to the remaining field would require a planning amendment and new surveys, and would be subject to approval. Likewise with the moving of the equipment.	The Applicant considers that the interface with the construction and operational access would be managed through detailed construction planning, including the sequencing of works, implementation of appropriate traffic management measures and coordination of construction activities. Ongoing engagement with Conrad Energy will inform the detailed construction sequencing and this will be influenced by the use and availability of the affected land at the time of construction and will be subject to further discussion and agreement.
RR-063-8	Principle of development	Due to the conflict between the WTWRP proposed route and Conrad's consented solar farm project in Wickham, which has an accepted grid connection and land agreements in place, we formally object to the proposals in the current form.	The Applicant acknowledges the respondent's position.
RR-063-9	Landowner engagement	In order to resolve our objection, we would expect the applicant to engage with us on co-location.	The Applicant confirms that it has engaged and will continue to engage with the respondent regarding the interaction between their solar development and the Project in an endeavour to mitigate impacts and address the concerns raised in their relevant representation. The Applicant has held several meetings with the respondent on the 24 November 2025, 20 April 2026, 22 June 2026 and has set up a recurring bi-

Reference	Theme	Issue raised	The Applicant's response
			monthly meeting with the respondent to allow the opportunity for continued engagement between the two projects.

Table 2-11 The Applicant's response to RR-074 from Ian Judd and Partners on behalf of David Doe

Reference	Theme	Issue raised	The Applicant's response
RR-074-1	Greeting	Please see the supporting email. Relevant Representation Prepared on Behalf of David Alan Doe In Relation to Hampshire Water Transfer and Water Recycling Project 1. Key Information Name of Interest party: [REDACTED] Business Name Address: West Oaks, Pricketts Hill, Shedfield, Southampton SO32 2JW Email Address: [REDACTED] @hotmail.co.uk Telephone Number: [REDACTED]	The Applicant notes this comment.
RR-074-2	Landowner engagement	Name & Address of Property Affected: Land at Pricketts Hill Land Plan Reference No: 15-015 237 square metres - Acquisition of Rights 15-016 89 square metres - Temporary Rights 15-017 391 square metres - Temporary Rights 15-018 3544 square metres - Acquisition of Rights 15-019 5 square metres- Acquisition of Rights Linear length of pipe: 97 Use of Land: Residential Property, commercial yard and pasture field Land Agent Instructed: Ian Judd and Partners, 4 High Street, Bishops Waltham, Southampton, Hampshire, SO32 1AB - 01489 896422 [REDACTED]@ianjuddandpartners.co.uk [MAP]	The Applicant notes this comment.
RR-074-3	Principle of development	2. Summary of Submission 2.1. I wish to become an interested party and submit my strongest objection to this Development Consent Order Application.	The Applicant notes this comment.

Reference	Theme	Issue raised	The Applicant's response
		2.2. The Order Limits are with 7.25m of my house.	
RR-074-4	Location of the proposed pipeline routes	3. Summary of Land Use 3.1. I own West Oaks, a total of 2.71 acres (1.10ha) of land at Pricketts Hill near Wickham. I live, with my wife in the dwelling onsite, as shown on the attached plan. I am a retired farm employee and farm contractor. This is the extent of my property, as shown orange on the plan. 3.2. The proposed order limits are within 7.25m of my front door, the order limits include my wastewater treatment plant and drainage area, the only access to my house and yard and my water supply. The impact on my property has not been given any consideration, when alternative routes exist.	The Pipeline route has been designed using an extensive route selection process as set out in the Scheme Development Report [APP-073, APP-074, APP-075]. In this area, key considerations for the Pipeline route selection were the South Downs National Park to the east, and residential areas and woodland around Shedfield to the west. In this field, the Pipeline has been routed through a gap between two trees to avoid the loss of trees that border the northern and eastern boundaries. The final design of the Pipeline will be determined at the detailed design stage, and will be informed by further investigations and surveys which will consider the presence of existing utilities and below ground assets. Please see the Applicant's responses to RR-074-5 to RR-074-10 for further detailed information on the points raised in RR-074-4.
RR-074-5	Land use and agriculture	3.3. My wife and I are pension age, and we need to ensure we can get to and from our home, without long walks. In an emergency we need to get emergency responders to a home. This project will cut all access to our home.	The Applicant acknowledges the concern regarding continued access to the property during construction, including the need to maintain access for residents and emergency services. The Project will ensure that access is retained to properties during the construction phase. Any access roads severed by the pipeline route would have crossing points installed to maintain access until the full reinstatement is complete. As detailed in the Traffic Management Strategy [APP-416], access to properties would be retained during the construction period. Appropriate arrangements will also be maintained to ensure access for emergency services where required. The Applicant therefore considers that access to residential properties will be maintained during construction and that appropriate measures are in place to avoid severance of access.
RR-074-6	Location of the proposed pipeline routes	4. Alternative Route 4.1. I propose an alternative route to relocate the pipeline proximity from my homes to east of the land. The route is shown red on the plan. This route avoids disturbance to my access and drive, my dwelling and the risk to the oak tree. It doesn't so adversely affect the development potential of my property. 4.2. This alternative route would allow Southern Water to construct the pipeline without as substantial impact on my dwelling.	Please refer to the Applicant's response to RR-074-4. In this field, the Pipeline has been routed through a gap between two trees to avoid the loss of trees that border the northern and eastern boundaries. Moving the Pipeline to the east of the field as suggested would result in the loss of trees at the north of the field and either side of Piricketts Hill.
RR-074-7	Land use and agriculture	5. Impact on the dwelling 5.1. We have concerns, given the close proximity, of the pipeline works on our health.management, and reducing working widths where sensitive constraints are present. The health assessment concluded that, following mitigation, there	The Applicant acknowledges this comment on the impacts of the Project on the dwelling and health. ES Chapter 12 Land use and agriculture, [APP-091] assesses the likely significant effects of the Project on residential properties, including properties within the Order Limits and residential properties located within 500m of the Order Limits. The assessment also considers temporary impacts on access,

Reference	Theme	Issue raised	The Applicant's response
		would be no significant adverse effects on population health as a result of air quality, odour, land quality or water environment impacts.	boundary features and in-combination amenity effects. Access to residential properties would be maintained at all times during construction and, where access roads are severed by the pipeline route, crossing points would be installed until full reinstatement is complete. As detailed in the Traffic Management Strategy [APP-416], appropriate arrangements would also be maintained to ensure access for emergency services where required. Given the short-term nature of closures and measures to reduce disruption, the magnitude of impact is assessed as minor adverse and not significant. In addition, ES Chapter 17 Socio-economics, Tourism and Health (Document reference 6.1, DCO Volume 6, Version 1) includes a detailed assessment of the potential health effects associated with the Project, drawing upon the findings of relevant topic-specific assessments, including air quality and odour, noise and vibration, traffic and transport, landscape and visual, land quality and ground conditions, and the water environment. A range of measures are embedded within the design and construction approach to protect health and wellbeing, including implementation of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), secure site management measures, controls to minimise dust, noise and vibration, traffic management arrangements, management of Public Rights of Way, and reductions in working width where sensitive constraints are present. The health assessment concluded that, following mitigation, there would be no significant adverse effects on population health as a result of air quality, odour, land quality or water environment impacts in Shedfield. The Applicant therefore considers that the potential effects of the Project on residential amenity and health have been appropriately assessed within ES Chapter 12 Land Use and Agriculture [APP-091] and ES Chapter 17 Socio-economics, Tourism and Health (Document reference 6.1, DCO Volume 6, Version 1).
RR-074-8	Noise and vibration	The noise, dust, vibration within 10m of our home.	The construction and operational phase noise and vibration impacts of the project have been assessed, as reported in ES Chapter 15 Noise and vibration [APP-094]. With reference to the construction noise and vibration assessment, set out in ES Appendix 15.1 Construction noise and vibration assessment [APP-179], this dwelling (R65) will be mainly affected by construction noise associated with the short-term works (<4-weeks), associated with the 'Pipeline –Construction' and 'Road Crossing' stages. As a minimum all construction noise impacts/effects would be mitigated through the implementation of Best Practicable Means (BPM) with additional noise and vibration mitigation measures where required. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) provides potential mitigation options, the final package of noise mitigation will be identified in a Noise and Vibration Management Plan to be submitted to the relevant Local Planning Authority for approval prior to commencement of construction.

Reference	Theme	Issue raised	The Applicant's response
			Vibration generating activity (such as shaft construction or tunnelling) would not take place within a proximity to R65, as outlined in Table 15-35 of ES Chapter 15 Noise and vibration [APP-094], that would result in adverse impact/effect on people or property, i.e. R65 is greater than 50m from vibration activity. Consequently, no significant construction noise and/or vibration impacts/effects would result. R65 is more than 1km from any source of operational noise or vibration (i.e. the Water Recycling Plant, Break Pressure Tank and Intermediate Pumping Stations). Hence this dwelling will not experience operational noise effects from the project and, with reference to ES Appendix 15.3 Operational noise assessment [APP-181], this dwelling (R65) would experience very low operational noise levels, below the threshold for observable effect. The Applicant has assessed the potential impacts of construction dust and particulate matter and odour emissions within section 6.8 of the ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1). Commensurate controls are detailed within environmental measures AQ1 to AQ18 as outlined in Table 5-1 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). With the implementation of mitigation measures commensurate to the highest level of risk assessed, the effect of construction dust and particulate matter emissions from the Project, including at the location of the property on Pricketts Lane, is considered to be not significant.
RR-074-9	Construction impacts and effects	We have concerns that the volume of heavy traffic could impact the foundations and structural stability of our home.	Construction traffic would be managed through approved construction control measures, including the routing of vehicles, management of construction activities and monitoring of construction impacts where appropriate. Heavy vehicle movements would be temporary in nature and would be undertaken in accordance with the controls and mitigation secured through the Traffic Management Strategy (TMS) [APP-416]. The Applicant would also require contractors to comply with relevant industry standards and good practice during construction, in accordance with commitments in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). With respect to evaluating vibration effects which would be the likely cause of structural damage to building foundations, section 15.5.49 of ES Chapter 15 Noise and Vibration [APP-094], evaluates the effect of construction vibration on buildings and states that "No structures with very high sensitivity to potential vibration damage impacts were identified within the construction vibration study area." The Applicant considers that these measures would help to manage construction traffic and minimise potential effects on nearby properties during construction.

Reference	Theme	Issue raised	The Applicant's response
RR-074-10	Construction impacts and effects	5.2. Many of our services pass through the order limits and could be damaged by the works.	The Applicant acknowledges the comment relating to potential effects on utility connections to the property. The Applicant has engaged in ongoing consultation with all the affected statutory undertakers to understand and account for their assets within the Order Limits. Schedule 10 of the draft DCO [APP-023] includes protective provisions for utilities during the detailed design and construction of the Project. The final design of the Pipeline will be determined at the detailed design stage. Prior to construction of the Project, engagement will be undertaken with landowners to determine the final location of the pipeline. A full utility survey would be carried out by the contractor, once appointed, to locate any service in the vicinity of the pipeline route as part of this engagement. The DCO application provides for further investigation where necessary, with relevant measures secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). The Contractor will refresh data on the locations of utilities at reasonable appropriate points during the design and construction of the Project to provide relevant information to plan, manage, monitor and co-ordinate health and safety in the construction phase. The risk of damage to utilities will be managed through the Contractor's Permit to Dig which will include details for avoidance of utilities and an emergency response which will be employed should a utility be damaged.
RR-074-11	Landowner engagement	6. Southern Waters Conduct to date 6.1. We have been disappointed in Southern Waters conduct to date. There are very few homeowners directly affected by the scheme, yet no effort has been made by Southern Water to identify the issues with their route and come up with engineered alternatives. 6.2. They have been most aggressive in their negotiations, ignoring our concerns and insulting in the offers made for the rights they wish to acquire.	The Applicant acknowledges the comments from the respondent. The Applicant does not recognise the suggestion that very few homeowners are directly affected by the Project. The Applicant is committed to working collaboratively with landowners and it remains the Applicant's firm preference to reach a voluntary agreement for the acquisition of land and rights where possible. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with landowners regarding voluntary agreements and has continued discussions with landowners since submission of the DCO application. The Applicant does not recognise the accusations levelled at its approach to the respondent. The Applicant notes the respondent's comments raised regarding engagement, however as detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken extensive engagement with landowners and considered all feedback provided throughout statutory and non-statutory consultation. The Applicant notes that the respondent did not provide formal feedback during the

Reference	Theme	Issue raised	The Applicant's response
			statutory consultation process and, as such, does not recognise the suggestion that the respondent's concerns have been ignored. The Applicant disagrees with the accusation that the commercial values offered are insulting. The Applicant's position on commercial values has been justified to the respondent via their representative on a number of occasions and aligns with established precedents set within the water industry. This approach was outlined in detail by the Applicant to the respondent's agent on 28 January 2026 and no response or counter proposal was received. The position on commercial values was also detailed within the cover letter sent alongside the Heads of Terms on 6 March 2026. The Applicant has also made several amendments to the proposed Heads of Terms and improved the commercial offer during the negotiations to reflect feedback provided by the respondent's representative and other land agents acting for landowners impacted by the Project. This increased offer was issued to the respondent on the 7 August 2026.
RR-074-12	Location of the pipeline routes	7. Need for Compulsory Purchase Powers 7.1. We believe that quantum of land within the order limits is necessary to facilitate the scheme and it volume of land taken is not proportionate for a pipe of this scale -0.8m.	The Applicant acknowledges the respondent's comments in relation to the Order Limits and acquisition of permanent rights. However, under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance. Please also refer to the Applicant's response to RR-074-13 below in relation to land take.
RR-074-13	Location of the proposed pipeline routes	7.2. On our property the order limits extending to 0.97 acres for 97 linear meters of pipe, which equates to an average of 40m in width, with a maximum width of around 63m. 7.3. We understand that Southern Water have chosen not to undertake detailed design and want an element of flexibility, this flexibility could be reduced to 20m in width. It is clear that the scale of the Order Limits significantly more than is reasonably necessary or proportionate for a pipe that 0.8m in width. 7.4. There is nothing within their submission that provides an justification for this excessive width of the order Limits.	The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs. The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction

Reference	Theme	Issue raised	The Applicant's response
			working areas, storage areas, pipeline trench and soil storage areas. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as further secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m for a maximum length of 42m.
RR-074-14	Location of the proposed pipeline routes	7.5. The Acquiring Authority have not provided any justification for the scale/quantum of the Order Limits. They have stated (Para 3.3.3 Document Reference 4.1) that the maximum working width is 40m. Yet later (para 3.3.1 Document Reference 4.1- please note numbering error in document) the working width may be up to 50m.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as further secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m for a maximum length of 42m.
RR-074-15	Location of the proposed pipeline routes	8. Scale of the Working Area 8.1. The justification for the working width is lacking any reality, below is an exact Graphic 3-3 Para 3.5.92 document Reference 6.1. [GRAPHIC]	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, which is secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3)). This would provide the necessary space for a haul road, construction working areas, material storage areas, pipeline trench and soil storage areas. This is set out at section 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3)). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m, over a distance of a maximum of 42m. The haul road/working area must be a sufficient width to allow a suitably sized excavator to track back at 90 degrees to the pipe to lift it and then lower into the trench. A suitably sized excavator capable of carrying out a tandem lift of a string of pipes would circa 11m long hence the 11m required. The working area for the trench excavation is calculated using the width of the excavator capable of pipeline installation (circa 3.5m) and a 2m deviation of the pipeline route in each direction without compromising the pipelaying process. If the pipeline has to change direction the joints are designed to allow a slight angle deviation to alter the direction this is a gradual process and requires sufficient space to allow for it. Therefore, a total of 7.5m.

Reference	Theme	Issue raised	The Applicant's response
			The pipe storage/jointing area must be wide enough to allow the pipes to be welded together to form the strings before lowering into the trench. As there will be welders working on this while the excavator is operating a 1m safety exclusion zone has to be in place. The total of the pipe storage/jointing area is therefore a total of 3.5m The area required for topsoil storage is based on topsoil being 200mm thick, which equates to $8m^3$ for a 40m working width. With a side slope of 1:1 and maximum height of 1.8m an area of 7m has been allocated which includes for any bulking factor. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The area required for subsoil provides enough width in this area to segregate upper and lower subsoils, therefore there would be two separate mounds, which ensures the subsoil can be reinstated properly. A 1:1 side slope and a bulking factor has been incorporated which equates to 7m. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The above areas equate to a working width of 40m.
RR-074-16	Construction impacts and effects	8.2. This has a "Working Area and Haul Road" of 11m and a pipe trench 4m wide. This is excessive, yet only totals 15m in width. They want a further 25m for topsoil and subsoil storage.	Please refer to the Applicant's response to RR-074-15.
RR-074-17	Location of the proposed pipeline routes	8.3. I have undertaken a simple calculation of what may be needed as a working width – The Haul Road may be 3m wide, with occasional passing places, – Working area 8m, this allows 6m of digger working area, plus 2m pipe storage – Pipe width - this will be 1.5m plus say 1.5m each side of pipe = 4.5m – Topsoil Storage - A fair estimate is assume 150mm of top soil, across 20m equates to $3m^3$ of top soil, stacked at 1:2, say 2.5m x 1.25m = $3.75m^3$, therefore 2.5m for topsoil storage. – Sub-soil Storage - If the trench is 4 wide and assume a depth of 2m (2.15m below ground level) deep 7.5m3 of subsoil, again assume 1:2 stack equates to 4m of subsoil storage. – Excess 2m excess for fencing and other uses – Total working area required - 24m in width	Please refer to the Applicant's response to RR-074-15.

Reference	Theme	Issue raised	The Applicant's response
RR-074-18	Location of the proposed pipeline routes	8.4. It is completely unjustified, unreasonably, unnecessary for the purpose, and disproportionate to permit a working area greater than 24m in width for open cut sections of pipe	Please refer to the Applicant's response to RR-074-15.
RR-074-19	Landowner engagement	8.5. If Southern Water wish to used additional space this can be done by agreement at a market rent with individual landowners.	Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance. The Applicant has set out where land over which powers of temporary possession only are sought is shown edged black and shaded yellow on the Land Plans (Document reference 2.2, DCO Volume 2, Version 2). The Applicant is also seeking temporary possession powers over all other land within the Order Limits to facilitate the construction of the Project. The land over which these powers are sought is shown edged black and shaded pink or blue on the Land Plans (Document reference 2.2, DCO Volume 2, Version 2). The Applicant has been seeking voluntary agreements for all land identified for temporary use. Details of this engagement can be found within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1). As detailed within the Statement of Reasons [APP-025], temporary possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the project. Whilst the Applicant's preference is to reach a voluntary agreement, it considers that the temporary possession powers sought within the DCO are necessary to ensure that the Project can be delivered where agreement cannot be reached. Reasonable losses incurred by landowners arising out of the temporary use of land will be reimbursed in line with the compensation code. The Applicant therefore considers that the temporary possession powers sought are justified and proportionate, whilst maintaining that a voluntary agreement remains its preferred outcome where possible.

Reference	Theme	Issue raised	The Applicant's response
RR-074-20	Location of the proposed pipeline routes	9. Scale of Easement Width 9.1. We haven't been provided any justification of the easement width restriction. Southern Water requested a 11m easement for open cut with permanent restriction place on this land. Yet for tunnelled section the easement has been reduced to 5m.	The purpose of the easement is to protect the integrity and operational requirements of the pipeline and to ensure appropriate access for inspection, maintenance, repair and replacement activities. The required width has been determined following a detailed technical assessment, taking account of the pipeline's diameter, depth, construction methodology, location and operational function. For sections of pipeline installed using open-cut construction, the Applicant is seeking an easement width of 11m (5.5m either side of the pipeline). This reflects the access and operational requirements associated with maintaining and, if necessary, excavating the pipeline in the future. Notably, this represents a reduction from the Applicant's published stand-off guidance for water mains of a comparable size and depth [1], which would typically require a wider protected corridor. This reduction from the normal requirement has been communicated to landowners and their agents where this is being challenged. For sections constructed using trenchless techniques, a reduced easement width is considered appropriate, taking into account depth, construction methodology and location. As the pipeline is installed at greater depth and future maintenance or operational access would be undertaken from either side of the trenchless section rather than directly above it, the same level of restriction is not required. The easement width has therefore been tailored to reflect the differing operational requirements of the construction methodologies. The Applicant is therefore satisfied that the easement widths proposed represent the minimum reasonably required to protect the pipeline and secure its safe operation over its lifetime.
RR-074-21	Location of the proposed pipeline routes	9.2. We have assessed other water providers easement width and the typical easement width for an 800mm pipe is 8m total width. 9.3. We have requested justification for this easement width; this hasn't been supplied. We therefore believe this is unreasonable, unjustified and disproportionate and should be reduced.	Please refer to the Applicant's response to RR-074-20. In accordance with the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition have been met. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits, whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) sets out the maximum diameter of the pipelines for the different Project components, which may be greater than the 800mm referenced by the Respondent. The Applicant considers the permanent rights sought are justified in order to protect and preserve the integrity of the Project.
RR-074-22	Landowner engagement	10. Private Negotiations and Alternative to Compulsory Purchase	The Applicant notes the comments from the respondent. The Applicant refutes the suggestion that it seeks to rely on statutory powers and confirms its preference to reach a voluntary agreement. The Applicant has

Reference	Theme	Issue raised	The Applicant's response
		10.1. We found Southern Water heads of terms insulting. It demonstrates how little they value our land. They are only playing lip-service and have no intention of reaching any form of settlement with Landowners and Occupiers 10.2. This is apparent from the Pre-application Land and Rights Negotiation Tracker (Document 4.4) only 1 landowner has returned Heads of Terms out of 172 Category 1 Landowners. The one that has been return is a middle section of a drill section, so no above ground access is needed. 99.4% of landowners have not entered heads of terms, clearly demonstrates that Southern Water have not made any significant effort to reach agreement with Landowners and Interested Partys and they are relying on taking land by compulsion. 10.3. I am concerned that Southern Water intend to use legislation to take my land, only because it's cheaper and easier than trying to reach a compromised agreement.	made several amendments to the proposed Heads of Terms and improved the commercial offer during negotiations with the respondent to demonstrate this preference. In addition, the Heads of Terms proposed align with those adopted across other utilities and infrastructure projects, which have also been agreed by respective Land Agent Groups, demonstrating the reasonableness of the terms proposed. Whilst the Applicant would prefer to be able to advise the Examining Authority of a higher return of signed Heads of Terms, it does not consider this to be because the terms offered to the respondent are unreasonable. To date, despite formally requesting evidence demonstrating why the commercial offer is considered unreasonable on 28 January 2026, the Applicant is yet to receive a response. The Applicant disagrees with the suggestion that significant efforts have not been made to reach an agreement with landowners. The Applicant has made several amendments to the proposed Heads of Terms as confirmed by a relevant representation made by a member of the Land Agent Group [RR-233] and improved the commercial offer during the negotiations to demonstrate this preference. As detailed within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with landowners regarding voluntary agreements and has continued discussions with landowners, either directly or through their professional representatives. Since February 2025, the Applicant has continued to engage with the respondent's representative through discussions with the Land Agent Group. Following issuing the Heads of Terms to the respondent on 3 March 2026, the Applicant attended a meeting with the respondent's representative on 13 May 2026 to discuss the voluntary agreement, offered updated terms on the 7 August 2026 and followed up on the updated offer on the 11 September 2026. The Applicant met with the respondent and their appointed land agent on 3 November 2026 to discuss heads of terms and the Project. The Applicant confirms that it is their preference to secure voluntary agreements for the acquisition of land and rights wherever possible.

Table 2-12 The Applicant's response to RR-079 from Woolley & Wallis LLP on behalf of David Patrick John Ellrich and Diane Mary Ellrich, and RR-342 from Woolley & Wallis LLP on behalf of P D L Milligan Trust

Reference	Theme	Issue raised	The Applicant's response
RR-079-1	Landowner Engagement	Financial terms being offered by Southern Water for voluntary agreements do not reflect the true disturbance likely to be suffered or the diminution in value of the land.	It remains the Applicant's firm preference to reach a voluntary agreement for the acquisition of land and rights where possible. The Applicant confirms that if a voluntary agreement is not reached with the respondent, reasonable losses arising out of the use of land will be reimbursed in line with the compensation code. The Applicant considers that the commercial offers made to landowners are reasonable. To date, despite formally requesting evidence of the respondent's assessment of the diminution in value on 28 January 2026, the Applicant is yet to receive a response. The Applicant welcomes further negotiation with the respondent in hopes of reaching agreement.
RR-079-2	Landowner Engagement	No recognition or allowance for development hope value within Southern Water's voluntary agreement.	On 30 July 2026, the Applicant offered the landowner a development clause that would allow the landowner to claim compensation for the reasonable diminution in value of the affected land if the development is prevented or rendered unimplementable solely due to the existence of the Project. The Applicant considers that this clause, which has also been offered to other respondents where appropriate, adequately addresses the respondent's comment. The Applicant has considered the potential for land to become developed and has amended the design of the Project where it intersects with land that is allocated in an adopted or emerging local plan, and where there is a live or approved planning application. The Applicant has confirmed that no planning application has been made at this site, and the site is not allocated for residential development in Winchester City Council's adopted or emerging local plan. Therefore, it would not be reasonable for the design of the Project to be impacted when there is no certainty that a development will come forward in this location.
RR-079-3	Location of the proposed pipeline routes	Pipeline route has not been designed to avoid land with long-term development potential, sterilising large tracts of land on the edge of existing settlements.	The Scheme Development Report [APP-073, APP-074, APP-075] sets the extensive process undertaken by the Applicant to identify the Pipeline route, having regard to a range of technical, planning and environmental criteria. The Applicant has also sought to avoid or reduce intersections with development sites that are subject to a live or approved planning application or allocated in local authority's adopted or emerging local plans. The Applicant has confirmed that no planning application has been made at this site, and the site is not allocated for residential development in Winchester City Council's adopted or emerging local plan. In the absence of an extant planning permission, live planning application or allocation within Winchester City Council's adopted or emerging development plan, the Applicant does not consider it reasonable to amend the design of the

Reference	Theme	Issue raised	The Applicant's response
			Project on the basis of potential future development that has not been formally progressed through the planning system.
RR-079-4	Landowner Engagement	Landowners are being disadvantaged and deterred from taking proper professional advice by the artificially low fee caps being imposed by Southern Water.	The Applicant has been reimbursing professional land agent costs arising from consultation and survey access since commencement of the Project. The Applicant is not aware of any outstanding fees incurred by the respondent. In respect of professional costs associated to the voluntary agreements, the Applicant has clarified to the respondent and their land agent that the cap is an initial fee cap. The Applicant has also pointed to provisions within the Heads of Terms allowing the respondent's land agent to seek an uplift to the cap should reasonable circumstances require. Notwithstanding these commitments in the voluntary agreement, under the RICS Professional Standard on compulsory purchase and statutory compensation, there is no obligation to cover professional fees until a statutory claim arises. In respect of professional costs associated with examination of the DCO, government guidance in the Department for Communities and Local Government's 'Awards of costs: examinations of applications for development consent orders' document dated July 2013 advises that parties are normally expected to meet their own costs.
RR-079-5	Landowner Engagement	Southern Water is refusing to reimburse landowners for their reasonable costs involved participating in the examination process.	The Applicant refers to the response to RR-079-4.
RR-079-6	EIA approach and methodology	Insufficient technical detail available on the project to enable landowners (or agents) to assess the true impact on land.	The Applicant notes the concern that insufficient technical detail has been provided to enable landowners and their representatives to assess the environmental effects of the Project on land interests. The Applicant considers that the information submitted with the Application is appropriate for the DCO application stage and provides a sufficient basis for understanding the nature and extent of the Project and its likely significant environmental effects during construction, operation and decommissioning. The Environmental Statement (ES) has been prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment (EIA)) Regulations 2017. The ES has been prepared in accordance with the Planning Inspectorate's EIA Scoping Opinion [APP-105], the response to which is documented in ES Appendix 5.3 Response to EIA Scoping Opinion [APP-106]. The EIA has been undertaken in accordance with the methodology described in ES Chapter 5 EIA Approach and Methodology [APP-084], which explains the use of the Rochdale Envelope approach. This approach is commonly applied to nationally significant infrastructure projects and enables environmental effects to be assessed against defined design parameters and reasonable worst case assumptions where aspects of detailed design will be developed post consent. Information regarding the location, extent and

Reference	Theme	Issue raised	The Applicant's response
			principal components of the Project is provided within the Works Plans [AS-007 – 1 of 2 documents, AS-008 – 2 of 2 documents and APP-014], Land Plans (Document reference 2.2, DCO Volume 2, Version 2), ES Chapter 3 Description of the Proposed Development [APP-082] and associated application drawings. Together, these documents identify the land required for the Project, the proposed works, temporary construction areas and permanent operational infrastructure, enabling affected parties to understand the extent of land interests potentially affected by the Project. In particular, ES Chapter 12 Land use and agriculture [APP-091] assesses the likely significant effects on land use, agricultural land and soils, including potential impacts on agricultural land holdings. The chapter sets out the assessment methodology, identifies relevant receptors and assesses the likely significant effects associated with the Project. In addition, ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1) provides the assessment of the likely significant effects on socio-economics, tourism and health from the construction, operation and decommissioning of the Project. This includes access to land that is defined as green space and used for recreation and physical activity including walking, cycling and horse riding. The chapter should be read alongside ES Chapter 12 Land use and agriculture [APP-091], as baseline data is shared across the socio-economics, tourism and health, and land use and agriculture assessments.
RR-079-7	Construction impacts and effects	Concerns over construction and operational impacts including access arrangements, accommodation works, notice periods and drainage infrastructure.	The potential effects arising during operation have been considered in the Operational Environmental Management Plan [APP-422]. For construction impacts please refer to the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Access requirements have been considered as part of the Project's design and construction planning. Where construction activities have the potential to temporarily affect access to residential properties, access would be maintained, and where road closures are proposed in proximity to one another, a sequential approach would be adopted to reduce disruption and impacts on journey times. Further information on construction access and traffic management is provided in the Framework Construction Traffic Management Plan [APP-415]. Where works affect individual land interests, the detailed arrangements, including appropriate accommodation works and access requirements, will be developed having regard to the circumstances of the affected holding and through continued engagement with the relevant landowner or occupier. Appropriate notification would be provided in accordance with the applicable provisions of the DCO and any relevant agreements before the exercise of the authorised powers. Drainage has also been considered as an integral part of the Project design. The Project incorporates Sustainable Drainage Systems (SuDS) and the

Reference	Theme	Issue raised	The Applicant's response
			application states that these are intended to ensure that the Project does not increase the rate or volume of surface-water runoff or increase flood risk elsewhere. The proposed SuDS Strategy for the Above Ground Plant and Water Recycling Plant is set out in ES Appendix 19.1 Flood Risk Assessment - 8 of 8 documents [APP-196] and has been developed in accordance with the principles underpinning the National Standards for Sustainable Drainage Systems. For methods for dealing with flooding during construction please refer to the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). The Applicant therefore considers that the DCO application provides an appropriate framework for managing construction and operational effects associated with access and drainage, with site-specific arrangements and accommodation works to be developed as the Project progresses and through continued engagement with affected landowners and occupiers.
RR-079-8	Landowner Engagement	Engagement from Southern Water's agents is at best perfunctory and merely a precursor to this examination.	The Applicant considers the engagement with affected parties and their land agents to have been extensive throughout the pre application stage, including meetings, written correspondence and consultation events, with ongoing discussions regarding the acquisition of land and rights, as detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1). To facilitate collective engagement on voluntary agreements, a number of professional representatives formed a Land Agent Group in February 2025. The Applicant issued draft Heads of Terms to the Land Agent Group on 3 February 2025 and subsequently engaged in negotiations on the terms. This engagement included in-person meetings with the Land Agent Group and several revisions to both the Heads of Terms and the commercial offering in response to feedback received. Following these discussions, the Applicant issued Heads of Terms to the respondent on 6 March 2026. Following further engagement, the Applicant wrote to the respondent on the 30 July 2026 proposing a development clause to cover points raised by the respondent (refer to the Applicant's response to RR-079-2). Since acceptance of the DCO application for Examination, the Applicant has made further amendments to clauses within the proposed Heads of Terms and an improved commercial offer to the respondent on 7 August 2026, further demonstrating reasonable efforts to engage constructively and reach a voluntary agreement. The Applicant remains committed to ongoing engagement during the Examination and, where appropriate, will continue discussions with the respondent and their representative to understand their concerns and consider whether further mitigation, accommodation measures or agreements can be secured. It remains the Applicant's preference to work collaboratively with affected parties and to seek voluntary agreements wherever possible.

Table 2-13 The Applicant's response to RR-083 from Ian Judd and Partners on behalf of Denise Furse

Reference	Theme	Issue raised	The Applicant's response
RR-083-1	Greeting	Please find Relevant Representation sent by email. Relevant Representation Prepared on Behalf of Denise Furse In Relation to Hampshire Water Transfer and Water Recycling Project 1. Key Information Name of Interest party: Denise Furse Address: [REDACTED] Email Address: [REDACTED] Telephone Number: [REDACTED]	The Applicant notes this comment.
RR-083-2	Landowner engagement	Name & Address of Property Affected: Land South of Shirrell Heath High Street Land Plan Reference No: 16-007 16-008 16-010 Area of Acquisition Rights requested: 1032 square metres 291 square metres Area of Temporary Rights Requested: 1622 square metres Linear length of pipe: 37m Use of Land: Private Leisure and recreation, equestrian grazing. Private allotments and small holding. Interest Parties on my land: I am the owner occupier of my land Land Agent Instructed: Ian Judd and Partners, 4 High Street, Bishops Waltham, Southampton, Hampshire, SO32 1AB (redacted) @ianjuddandpartners.co.uk [MAP]	The Applicant notes this comment.
RR-083-3	Principle of development	2. Summary of Submission 2.1. I wish to become an interested party and submit my strongest objection to this Development Consent Order Application.	The Applicant notes this comment.

Reference	Theme	Issue raised	The Applicant's response
RR-083-4	Land use and agriculture	3. Summary of Land Use 3.1. I own a total of 2.83 acres (1.15 ha) of land south of Farthing Cottage, Shirrell Heath. We use our land for our private enjoyment, we keep our horses, geese, and other poultry on the land, we tend to vegetables and grow food for our consumption.	The Applicant notes that the land is used for private enjoyment, including the keeping of horses and poultry and the growing of food for personal consumption.
RR-083-5	Landowner engagement	3.2. It has been our long-held plan for us to use my property for our retirement. We are now in our 60s and 70s and are looking to enjoy our land which has taken significant work to acquire and build up the small holding for our retirements. 3.3. This project could have significant impact on us for the next 10 years. This the period of time we saved to enjoy our land the most.	The Applicant notes this comment. None of the restrictions set out in Schedule 5 to the draft DCO [APP-023] will prohibit the respondent from continuing to use the land for its existing purpose once construction is complete. The Applicant confirms that compensation will be paid for any reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-083-6	Landowner engagement	4. Southern Waters Conduct to date 4.1. We have been disappointed in Southern Waters conduct to date. We have tried hard to work with Southern Water's agents and surveyors, however, they have been incompetent, lacking knowledge, care or concern for my property. 4.2. Every Southern Water agent appears to threaten compulsory acquisition at every meeting. There is no desire from Southern Water to try to reach a voluntary agreement, unless its solely on their terms. 4.3. We took part in the public consultation in 2024 & 2025, yet our concerns have never been taken seriously and have never been addressed. The public consultations were just a formality that Southern Water gave lip-service to. 4.4. It should be noted that communication has been poor between Southern Water to landowners with limited feedback on the 2024 or 2025 Consultation. The 2024 Consultation Feedback identified the lack of trust in Southern Water. They do not appear to have done anything to improve the relationship between Southern Water and landowners. 4.5. Our trust and faith that Southern Water would act in a responsible manner to "take care" of our land & work in partnership with landowners is long gone. Southern Water have proven time and again they cannot be trusted as a responsible entity. The Secretary of State should have given consideration to Southern Water's historic inadequacies and put in place strict measures to hold Southern Water to account if this DCO is approved.	The Applicant does not recognise the accusations levelled at its approach to landowners. The Applicant confirms that consultation responses were received from the respondent at both the 2024 and 2025 consultation events. The Applicant wrote to the respondent on 9 December 2025 with a response to this feedback addressing the points raised by the respondent. Within this correspondence, the Applicant confirmed that changes had been made to the compound alignment based on the feedback provided. Further information can also be found within the Consultation Report [APP-029]. During discussions with landowners, the Applicant has acted responsibly in making landowners aware of the statutory alternatives available, should voluntary agreements not be reached. In relation to surveys, the use of statutory powers under Section 172 of the Housing and Planning Act 2016 has been referenced in correspondence to ensure the respondent is aware of the statutory powers available but confirmed that these would only be relied upon following reasonable attempts to secure access by voluntary agreement. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with the respondent regarding a voluntary agreement. The Applicant's engagement has invited the respondent to provide information about their land but to date, no information has been shared.
RR-083-7	The Applicant's wider operations and Project interfaces	Southern Water have stated publicly that some senior employees have changed and the company is now different. It is very clear that despite the change in senior employees, the company still cannot be trusted to do what they say they will. This has been demonstrated repeatedly both on this project and generally.	The Applicant recognises concerns about its historic performance and the effect this has on public trust. The Project would not rely on general assurance alone. It is subject to DCO examination, environmental permitting, Drinking Water Inspectorate (DWI) regulation, water safety planning, monitoring, reporting and operational controls, all of which it must demonstrate compliance with in order to successfully operate.

Reference	Theme	Issue raised	The Applicant's response
RR-083-8	Landowner engagement	Example 1: The agreed and signed "License For Groundwater Monitoring Borehole" for the installation, monitoring and removal of a borehole on my property stated, "The ground will be reinstated to a condition as near as possible to that before the works started". When Southern Water's Contractors attended site to remove the borehole and reinstate my land, the Contractors refused to comply with the agreed and signed reinstatement, insisting that they had to backfill with a different material that did not comply with the signed agreement and therefore was not consistent with the soil type of my land.	The Applicant considers that reinstatement was completed satisfactorily and is not aware of any outstanding issues or compensation claims. If the respondent considers this to be incorrect, we welcome further engagement.
RR-083-9	Landowner engagement	Example 2: The "Land Interest Questionnaire" that was sent to me by Southern Water's Land Agents requested that I sign to agree to the boundaries of my owned land being as shown on an attached plan of 'my land'. There were several significant errors to the boundaries of my owned land on the attached plan. We had a site meeting with Southern Water's Land Agents during which we provided them with a copy of the official boundary plan from my official Land Registry document. This was on 21st March 2024 and to date we have still not yet received a document containing a plan showing the correct boundaries of my land, so the "Land Interest Questionnaire" has still not been signed and agreed by me. It should be noted that the 'Southern Water Plan' as reproduced in section 1 of this document is also therefore still not correct.	The Applicant confirms that following the information provided at the site meeting on 21 March 2024, the Applicant wrote to the respondent with an updated Land Interest Questionnaire on 9 April 2024 with an updated plan. The Applicant welcomes further engagement from the respondent if the updated information does not reflect the correct boundaries.
RR-083-10	Landowner engagement	Example 3: Southern Water have still not paid compensation for the borehole installation, monitoring and removal that was claimed in December 2024.	The Applicant confirms that this compensation query has been escalated to the respondent's representative on 11 September 2026, as the Applicant has not been made aware of any outstanding compensation claims. Once the claim is received, the Applicant confirms it will provide a response to the respondent as it has done with other landowners along the route.
RR-083-11	Landowner engagement	5. Need for Compulsory Purchase Powers 5.1. The Department for Communities and Local Government, Planning Act 2008, Guidance related to Procedures for the compulsory acquisition of land (CA Guidance), sets out the requirements Acquiring Authorities should meet to be granted CPO powers. 5.2. Para 6. "provides that a development consent order may only authorise compulsory acquisition if the Secretary of State is satisfied that: - the land is required for the development to which the consent relates, or is required to facilitate, or is incidental to, the development,". 5.3. Para 8. "The applicant will also need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate"	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 (PA 2008) and the considerations set out in the Compulsory Acquisition Guidance.

Reference	Theme	Issue raised	The Applicant's response
RR-083-12	Landowner engagement	5.4. Para 9. "The applicant must have a clear idea of how they intend to use the land which it is proposed to acquire. 5.5. Para 11. Section 122 of the Planning Act sets out two conditions which must be met to the satisfaction of the Secretary of State before compulsory acquisition can be authorised. The first of these is related to the purpose for which compulsory acquisition is sought. These three purposes are set out in section 122(2): (i) the land is required for the development to which the development consent relates. For this to be met, the applicant should be able to demonstrate to the satisfaction of the Secretary of State that the land in question is needed for the development for which consent is sought. The Secretary of State will need to be satisfied that the land to be acquired is no more than is reasonably required for the purposes of the development. (ii) the land is required to facilitate or is incidental to the proposed development. An example might be the acquisition of land for the purposes of landscaping the project. In such a case the Secretary of State will need to be satisfied that the development could only be landscaped to a satisfactory standard if the land in question were to be compulsorily acquired, and that the land to be taken is no more than is reasonably necessary for that purpose, and that is proportionate.	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the PA 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the PA 2008 and the considerations set out in the Compulsory Acquisition Guidance. The Applicant's proposed use of the land is set out in the Works Plans [AS-008] with detail of each Works Number set out in 'Schedule 1 – Authorised Development' to the draft DCO [APP-023]. The respondent is affected by 'Works No.4 – Pipeline between the WRP site and Otterbourne WSW' and 'Works No.6 – Construction Compounds' for which the Applicant is seeking the acquisition of rights and temporary possession powers as set out in the Land Plans (Document reference 2.2, DCO Volume 2, Version 2). The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. As detailed within the Statement of Reasons [APP-025], temporary use possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the project.
RR-083-13	Location of the proposed pipeline routes	5.6. We believe that part of the land included within the order limits is not necessary to facilitate the scheme and the volume of land taken is not proportionate. 5.7. On our property the order limits extending to 2.83 acres, 0.66 acres is being taken by this scheme, 23% for only 36 linear meters of pipe. The area within the order limits is 44m x 53m, considerably larger than needed. Despite my request during the 2024 or 2025 Consultation for Southern Water to reduce the area of my land taken for the scheme, (as it seemed unnecessarily large), Southern Water have significantly increased the area of land they now want to take without any communication or explanation whatsoever.	In this location the Applicant requires land to construct the Pipeline and to locate a temporary construction compound to support trenchless construction under the narrow access track that leads to High Street. Trenchless construction is proposed so that access can be maintained along this access track, and as it would be too narrow to install the Pipeline using open cut construction.

Reference	Theme	Issue raised	The Applicant's response
RR-083-14	Location of the proposed pipeline routes	5.8. The Acquiring Authority have not provided any justification for the scale/quantum of the Order Limits. They have stated (Para 3.3.3 Document Reference 4.1) that the maximum working width is 40m. Yet later (para 3.3.1 Document Reference 4.1- please note numbering error in document) the working width may be up to 50m. 5.9. We understand that Southern Water have chosen not to undertake detailed design and want an element of flexibility, this flexibility could be reduced to 20m in width. It is clear that the scale of the Order Limits is significantly more than is reasonably necessary or proportionate for a pipe that is 0.8m in width. 5.10. We believe the Order Limits should be significantly reduced to a maximum of 20m. If the Acquiring Authority require a greater area for unnecessary off-site storage, they can rent commercially available space off site. 5.11. There is nothing within their submission that provides a justification for this excessive width of the order Limits.	The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The design of the Project as set out in the DCO application provides flexibility for refinement informed by further surveys and investigations at the detailed design stage. The detailed design will be developed following approval of the DCO application and the appointment of a Contractor. This approach ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs. The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m for a maximum length of 42m. If part of the required construction storage were to be located off-site, this would significantly increase the duration of construction works and the number of construction vehicle movements on the highway network. Both of these factors would result in adverse impacts on the environment and local communities.
RR-083-15	Location of the proposed pipeline routes	6. Scale of the Working Area 6.1. We believe the Working Width is excessive, unjustified and should be reduced. The justification for the "Working Width" is lacking any reality of what may be required for construction. Below is an extract Graphic 3-3 Para 3.5.92 document Reference 6.1. [GRAPHIC]	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, which is secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide the necessary space for a haul road, construction working areas, material storage areas, pipeline trench and soil storage areas. This is set out at section 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working

Reference	Theme	Issue raised	The Applicant's response
			width either side of the length that is reduced may need to be widened up to 50m, over a distance of a maximum of 42m. The haul road/working area must be a sufficient width to allow a suitably sized excavator to track back at 90 degrees to the pipe to lift it and then lower into the trench. A suitably sized excavator capable of carrying out a tandem lift of a string of pipes would circa 11m long hence the 11m required. The working area for the trench excavation is calculated using the width of the excavator capable of pipeline installation (circa 3.5m) and a 2m deviation of the pipeline route in each direction without compromising the pipelaying process. If the pipeline has to change direction the joints are designed to allow a slight angle deviation to alter the direction this is a gradual process and requires sufficient space to allow for it. Therefore, a total of 7.5m. The pipe storage/jointing area must be wide enough to allow the pipes to be welded together to form the strings before lowering into the trench. As there will be welders working on this while the excavator is operating a 1m safety exclusion zone has to be in place. The total of the pipe storage/jointing area is therefore a total of 3.5m The area required for topsoil storage is based on topsoil being 200mm thick, which equates to 8m^3 for a 40m working width. With a side slope of 1:1 and maximum height of 1.8m an area of 7m has been allocated which includes for any bulking factor. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The area required for subsoil provides enough width in this area to segregate upper and lower subsoils, therefore there would be two separate mounds, which ensures the subsoil can be reinstated properly. A 1:1 side slope and a bulking factor has been incorporated which equates to 7m. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The above areas equate to a working width of 40m.
RR-083-16	Location of the proposed pipeline routes	6.2. This has a "Working Area and Haul Road" of 11m and a pipe trench 4m wide. This is excessive, yet only totals 15m in width. They want a further 25m for topsoil and subsoil storage, this is not necessary, reasonable or proportionate.	See response to RR-83-15.
RR-083-17	Location of the proposed pipeline routes	6.3. I have undertaken a simple calculation of what may be needed as a working width - The Haul Road may be 3m wide, with occasional passing places, - Working area 8m, this allows 6m of digger working area, plus 2m pipe storage - Pipe width - this will be 1.5m plus say 1.5m each side of pipe = 4.5m	See response to RR-83-15.

Reference	Theme	Issue raised	The Applicant's response
		- Topsoil Storage - A fair estimate is to assume 150mm of top soil, across 20m equates to 3m³ of top soil, stacked at 1:2, say 2.5m x 1.25m = 3.75m³, therefore 2.5m for topsoil storage. - Sub-soil Storage - If the trench is 4m wide and assume a depth of 2m (2.15m below ground level) deep 7.5m³ of subsoil, again assume 1:2 stack equates to 4m of subsoil storage. - Excess 2m excess for fencing and other uses - Total working area required - 24m in width	
RR-083-18	Location of the proposed pipeline routes	6.4. It is completely unjustified, unreasonable and unnecessary for the purpose, and disproportionate to permit a working area greater than 24m in width for open cut sections of pipe.	See response to RR-83-15.
RR-083-19	Landowner engagement	6.5. If Southern Water wish to use additional space this can be done by agreement at a market rent with individual landowners.	The Applicant has been seeking voluntary agreements for all land identified for temporary possession. Details of this engagement can be found within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1). As detailed within the Statement of Reasons [APP-025], temporary use possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the project. Whilst the Applicant's preference is to reach a voluntary agreement, it considers that the temporary possession powers sought within the DCO are necessary to ensure that the Project can be delivered where agreement cannot be reached. Reasonable losses incurred by landowners arising out of the temporary use of land will be reimbursed in line with the Compensation Code. The Applicant therefore considers that the temporary possession powers sought are justified and proportionate, whilst maintaining that a voluntary agreement remains its preferred outcome where possible.
RR-083-20	Location of the proposed pipeline routes	7. Scale of Easement Width 7.1. We haven't been provided any justification of the easement width restriction. Southern Water requested a 11m easement for open cut, with permanent restriction place on this land. Yet for tunnelled section the easement has been reduced to 5m.	The purpose of the easement is to protect the integrity and operational requirements of the pipeline and to ensure appropriate access for inspection, maintenance, repair and replacement activities. The required width has been determined following a detailed technical assessment, taking account of the pipeline's diameter, depth, construction methodology, location and operational function. For sections of pipeline installed using open-cut construction, the Applicant is seeking an easement width of 11m (5.5m either side of the pipeline). This reflects the access and operational requirements associated with maintaining and, if necessary, excavating the pipeline in the future. Notably, this

Reference	Theme	Issue raised	The Applicant's response
			represents a reduction from the Applicant's published stand-off guidance for water mains of a comparable size and depth [1], which would typically require a wider protected corridor. This reduction from the normal requirement has been communicated to landowners and their agents where this is being challenged. For sections constructed using trenchless techniques, a reduced easement width is considered appropriate, taking into account depth, construction methodology and location. As the pipeline is installed at greater depth and future maintenance or operational access would be undertaken from either side of the trenchless section rather than directly above it, the same level of restriction is not required. The easement width has therefore been tailored to reflect the differing operational requirements of the construction methodologies. The Applicant is therefore satisfied that the easement widths proposed represent the minimum reasonably required to protect the pipeline and secure its safe operation over its lifetime.
RR-083-21	Location of the proposed pipeline routes	7.2. We have assessed other water providers easement width and the typical easement width for an 800mm pipe is 8m total width. 7.3. We have requested justification for this easement width; this hasn't been supplied. We therefore believe this is unreasonable, unjustified and disproportionate and should be reduced.	Please see the Applicant's response to RR-083-20. In accordance with the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition have been met. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits, whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) sets out the maximum diameter of the pipelines for the different Project components, which may be greater than the 800mm referenced by the Respondent. The Applicant considers the permanent rights sought are justified in order to protect and preserve the integrity of the Project.
RR-083-22	Construction compound locations	8. Scale of Trenchless Launch Compounds 8.1. The scale of the Trenchless Compound is demonstrated in Graphic 3-12 in Application Document Ref: 6. 1. Being 100m x 50m for each a launch and reception shaft site. This is far too large and unnecessary. As you can see from the graphic there is 50% unused space.	Graphic 3-12 in ES Chapter 3 Description of the Proposed Development [APP-082] provides an indicative plan of a typical trenchless launch and reception shaft compound. The referenced unused space in this figure is required so that construction vehicles (which will be segregated from pedestrians) have sufficient space to safely and efficiently manoeuvre and load/unload, otherwise there would be a risk of conflict between construction activities which could pose a risk to construction workers, and it ensures works can be undertaken in a timely manner.
RR-083-23	Construction compound locations	8.2. These compounds should be significantly reduced to no more than is reasonably required for the purposes of the development. The land to be taken is no more than is reasonably necessary for that purpose, and that is proportionate.	As set out in RR-083-22 and ES Chapter 3 Description of the Proposed Development [APP-082] the land proposed for the temporary trenchless construction compound is required to carry out construction activities efficiently and safely. The Applicant has included the minimum amount of land necessary

Reference	Theme	Issue raised	The Applicant's response
			to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-083-24	Construction compound locations	8.3. We believe that if Southern Water cannot justify the need for each m², the Examining Authority should significantly reduce the compound scale.	As set out in RR-083-22 and ES Chapter 3 Description of the Proposed Development [APP-082] the land proposed for the temporary trenchless construction compound is required to carry out construction activities efficiently and safely. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-083-25	Landowner engagement	9. Private Negotiations and Alternative to Compulsory Purchase 9.1. We understand that it is not for the planning Inspectorate to comment on the terms of any private negotiated agreements. We must comment that Southern Water have been impossible to work with. They have dictated terms, without giving any consideration to amending the terms. The terms offered are significantly worse that those under compulsory acquisition.	Since the commencement of negotiations of Heads of Terms, the Applicant has made several amendments to the proposed Heads of Terms as confirmed by a relevant representation made by a member of the Land Agent Group [RR-233] and improved the commercial offer during the negotiations to demonstrate this preference. In reference to the commercial terms offered, the Applicant does not consider the offer to put the respondent in a worse position than under compulsory acquisition. The Applicant formally requested evidence from the respondent's land agent on 28 January 2026 substantiating this claim. The Applicant is yet to receive a substantive response from the land agent.
RR-083-26	Landowner engagement	9.2. They are only playing lip-service and have no intention of reaching any form of settlement with Landowners and Occupiers. This is apparent from the Preapplication Land and Rights Negotiation Tracker (Document 4.4) only 1 landowner has returned Heads of Terms out of 172 Category 1 Landowners. The one that has been return is a middle section of a drill section, so no above ground access is needed. 0.58% sign up rate, clearly demonstrates that Southern Water have not made any significant effort to reach agreement with Landowners and Interested Parties and they are relying on taking land by compulsion.	The Applicant refutes the respondent's comments on the approach taken to the negotiation of voluntary agreements. Whilst the Applicant would prefer to be able to advise the Examining Authority of a higher return of signed Heads of Terms, it does not consider this to be because the terms offered to the respondent are unreasonable. To date, despite formally requesting evidence demonstrating why the commercial offer is considered unreasonable on 28 January 2026, the Applicant is yet to receive a response. The Heads of Terms proposed by the Applicant closely align with those adopted across other utilities and infrastructure projects, which have also been reviewed and accepted by respective land agent groups.

Reference	Theme	Issue raised	The Applicant's response
			As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with landowners regarding voluntary agreements and has continued discussions with landowners since submission of the DCO application.
RR-083-27	Landowner engagement	9.3. Not a single Option Agreement has been entered into.	The Applicant notes this comment.
RR-083-28	Landowner engagement	9.4. I believe it is disingenuous to categorize me as "Head of Terms negotiation ongoing"(yellow status). This is not true; Southern Water have shown no interest in reaching an agreement with us. I request that my status is amended to "Heads of Terms agreements unlikely before close of examination (red)".	The status recorded for the respondent by the Applicant, in the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1) does not indicate that voluntary agreement is agreed. Given that Heads of Terms for a voluntary agreement have been issued and continue to be discussed with the respondent's representative, the status is considered correct. Following the Heads of Terms being issued on 6 March 2026 the respondent's representative wrote to the Applicant confirming that the respondent rejected the terms and did not wish to have a meeting. Subsequently, the Applicant discussed the Heads of Terms with the respondent's representative at a meeting on 13 May 2026. Following this, the Applicant requested a further meeting on 17 July 2026 and, after issuing a letter proposing revised Heads of Terms on 7 August 2026 incorporating amended provisions and improved commercial terms, sought an additional meeting with the respondent's agent on 11 September 2026. The Applicant met with the respondent on 13 October 2026 to discuss heads of terms and the Project, evidencing the Applicant's attempts to reach a voluntary agreement.
RR-083-29	Land use and agriculture	10. Land Quality and Water Logging 10.1. Our soils comprise of Holidays Hill soil type, being deep sand to clay, Soilscape defines a naturally wet very acid sandy and loamy soils, with shallow groundwater.	The Applicant notes this comment regarding the characteristics of the soils present within the landholding. The Applicant confirms in ES Appendix 12.1 Agricultural Land Quality [APP-169] that sandy soils over clay of the Holiday Hill association are present within the Order Limits. The characteristics of these soils have informed the assessment of agricultural land quality and the soil management measures set out within the Outline Soil Resource Management Plan (SRMP), contained within Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3).
RR-083-30	Water environment	10.2. The land is prone to flooding. During periods of rain, surface water runs from the High Street (lat/long 50.919899, -1.192526), down the track (SE and then SSE through lat/long 50.918866 -1.190960), this can often be 100mm deep and resemble a small river. Enough water to completely fill/swamp your earthworks in a few minutes.	The Applicant acknowledges the respondent's comments regarding concerns about surface water run-off and flooding. The Outline Construction Environmental Plan (CEMP) (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), secured by Requirement 6 of the draft DCO [APP-023], sets out measures that will be implemented to

Reference	Theme	Issue raised	The Applicant's response
			manage drainage, prevent erosion of exposed soils and limit the supply of fine sediment to the surface drainage network during construction, including: • WE4: A Construction Drainage Plan will be prepared by the Contractor to manage the quality and quality of construction stage drainage. • WE5: The Construction Drainage Plan will incorporate measures to reduce/remove the risk of sediment entrainment. A detailed flood risk assessment is presented in ES Appendix 19.1 Flood Risk Assessment [APP-189], including the land to the south of Shirrell Heath that would be crossed by the Pipeline. This concludes that the Pipeline is appropriate for the location, would appropriately manage flood risk during construction, and would not result in an increase in off-site flood risk.
RR-083-31	Construction impacts and effects	10.3. You will need to work with other authorities (Highways etc), to have works performed in advance of the works, to prevent surface water from running off the high street and down this track. If you dig a tunnel pit, this will fill with water and you will require 24/7 tanker pumps to remove this water from the site.	Construction would be undertaken in accordance with the good practice principles set out in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3), which is secured within the DCO. Specific surface water management procedures would be developed as part of the Construction Drainage Plan, as secured in measures CCC2, WE4 and WE5 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3).
RR-083-32	Landowner engagement	10.4. Currently, the surface water avoids any drains that are present. Absolutely no surface water or ground water is to be allowed onto my property or to be discharged/released onto or into my property. All water (Surface or Ground) must be contained and removed from the site.	Please refer to the Applicant's response to RR-083-30.
RR-083-33	Landowner engagement	10.5. We would like commitments within the DCO that no water will be pumped or discharged onto our land. And also, that immediately on completion of the works, the grass verge bordering the top track must (as requested previously) be reinstated to at least 150mm above the height of the track to prevent flooding due to water runoff.	The Applicant notes the concerns raised regarding drainage and reinstatement. In relation to flood risk matters please refer to the Applicant's response to RR-083-30. In relation to reinstatement, Articles 37 and 38 of the draft DCO require land subject to temporary possession to be restored following completion of the relevant works.
RR-083-34	Land use and agriculture	10.6. We keep livestock and grow fruit and vegetables downhill from your works and any release of water would have significant adverse effects on these activities.	The Applicant notes concerns about water runoff during construction affecting existing agricultural activities. The Project includes measures to protect surrounding land, vegetation and water environments during construction. Potential effects on surface water and groundwater are assessed within Environmental Statement (ES) Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1), which concludes that there will be no significant effects caused by intermittent or unplanned releases, or changes to surface water flows, infiltration or flood risk during operation of the Project. Measures to control runoff, sediment

Reference	Theme	Issue raised	The Applicant's response
			movement and pollution are included within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). These measures include the implementation of a Construction Drainage Plan, which details the interception and management of surface water run-off, and are intended to minimise the risk of indirect effects on existing agricultural land use, trees, hedgerows and associated habitats arising from changes in soil condition or water movement during construction.
RR-083-35	Construction impacts and effects	11. Security 11.1. We have considerable concerns regarding the risk of theft from our property. The proposed haul road will need to be locked each night. A procedure and financial penalties imposed if our land is not kept secure by Southern Water.	The Applicant notes the concern about security. As set out in the Applicant's response to RR-083-36, prior to construction, the appointed Contractor would be required to prepare detailed construction management documentation, including site-specific security arrangements. However, it has been highlighted within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) that the Contractor would carry out site-specific assessments of security and trespass risk and implement appropriate control measures. These include use of temporary fencing or hoardings, as appropriate, temporary site lighting at site perimeters, as appropriate, and closed-circuit television where required. Fencing and hoarding shall be kept well maintained by the Contractor throughout construction. These features would further enhance site security and public safety.
RR-083-36	Construction impacts and effects	11.2. The site security measure listed in Para 4.6 of Application Document Ref: 7.1 are significantly insufficient. We expect our land to properly protected throughout their occupation.	The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) is a framework document. Prior to construction, the appointed Contractor will be required to prepare a detailed CEMP and submit it for approval in accordance with the corresponding requirement in Schedule 2 to the Draft Development Consent Order (Draft DCO) [APP-023]. This will include detailed construction management documentation, including site-specific security arrangements that reflect the characteristics, location and risks associated with individual work areas.
RR-083-37	Construction impacts and effects	12. Access 12.1. We require 24/7 access to my property through the metal gate to/from the track leading to the High Street. This will include periodic access with large vehicles, eg 20-ton lorry/trailer, large horse lorry (10m long), Caravan + long wheelbase Defender (13m long). Sufficient space must be allowed for such vehicles to enter/leave the property, including space inside the gate to turn to go down the property and the reverse when leaving.	Prior to construction, the Contractor will engage with landowners to confirm the approach to construction, including access arrangements during the works. As secured within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), the Applicant confirms that stiles, gates or gaps will be incorporated into temporary fencing where reasonably practicable to maintain access for the respondent. Where reasonably practicable, access points will be provided by agreement with the respondent to allow access across the construction working width and thereby mitigate field severance. The Applicant has also made a specific commitment relating to maintaining access for landowners where reasonably practicable, which will be secured through the DCO and associated management plans. This measure is outlined

Reference	Theme	Issue raised	The Applicant's response
			in reference Mit-GT 248 of ES Appendix 5.5 Commitments Register (Document reference 6.2, DCO Volume 6, Version 1).
RR-083-38	Construction impacts and effects	12.2. We need access to: - The small 'static' trailer inside the metal gate, this cannot be moved. - The field shelter near the SW corner. - Up/down the field to/from the metal gate, with large vehicles. - Vehicle across the field (N to S) above the pony paddock and Goose run.	Please refer to the Applicant's response to RR-083-37.
RR-083-39	Construction impacts and effects	12.3. Please reduce the size of the compound to allow unfettered 24/7 access to the retained land.	Please see the Applicant's response to RR-083-37. Detail on the construction compounds is outlined in ES Chapter 3 Description of the Proposed Development [APP-082] under section 3.5.129 onwards. Graphic 3-12 provides an indicative plan of a typical trenchless launch and reception shaft compound.
RR-083-40	Landowner engagement	12.4. It is unclear how Southern Water will access our land. The access track is not suitable for heavy construction equipment. There isn't sufficient room to turn an articulated lorry at the end of the track.	The Applicant has outlined the access routes for construction within the Framework Construction Traffic Management Plan [APP-415]. Access to the respondent's land parcel will be taken from Pricketts Hill and along the Pipeline corridor or, where appropriate, from Shirrell Heath High Street and along the corridor. The access from Pricketts Hill along the Pipeline route will allow for heavy construction traffic.
RR-083-41	Landowner engagement	13. Conclusion 13.1. For the reasons set out above, I strongly object to the proposed compulsory acquisition powers and the extent of the order limits affecting my land. The proposed working areas, easement width and compound areas are excessive, insufficiently justified and disproportionate to the works required. If the Development Consent Order is granted, I respectfully request that the Examining Authority and Secretary of State require Southern Water to reduce the land take to the minimum reasonably necessary, provide robust protections for access, security, drainage and livestock, and secure enforceable commitments to protect my property and its ongoing use.	The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. In accordance with the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition have been met. As detailed within the Statement of Reasons [APP-025], temporary use possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the Project. As secured within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), the Applicant confirms the associated protections for access, security, drainage and livestock. Contained within the 7.1 Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) is the Outline Soil Resource Management Plan (Appendix B) where further detail can be found on soil management. This plan also confirms that the Project will appoint an Agricultural Liaison Officer ("ALO") who will act as a liaison between landowners and the appointed contractor. The ALO will be the primary contact for ongoing engagement with landowners, occupiers

Reference	Theme	Issue raised	The Applicant's response
			and their agents about practical agricultural matters before and during construction. The Applicant has also made a specific commitment relating to maintaining access for landowners where reasonably practicable, which will be secured through the DCO and associated management plans. This measure is outlined in the Commitments Register ES Appendix 5.5 [APP-108] reference Mit-GT 248.

Table 2-14 The Applicant's response to RR-087 from Duncan Alan Mark Smith

Reference	Theme	Issue raised	The Applicant's response
RR-087-1	Principle of development	I am supportive of Southern Water HWTWRP's application for a DCO (Development Consent Order) reflecting its usage of the pipeline.	The Applicant welcomes this support for the Project.
RR-087-2	Landowner engagement	31-July 2026, the Collective Residents of (redacted), Bedhampton, submitted a Request for Information to Southern Water's HWTWRP team, to help us understand the scope of the DCO upon our Properties' boundaries and our Rights; and how that DCO aligned with Portsmouth Water's already-exercised access-rights under The Water Industry Act, Section 159. Southern Water project team's 14-August 2026 response has provided the clarity and reassurance I required; and I have no open question nor concern regarding Southern Water's intended operation of the pipeline.	The Applicant notes this comment and welcomes the respondent's acknowledgment that they have no concerns regarding the pipeline's operation.
RR-087-3	Portsmouth Water proposal	Southern Water's response explained that any "during operational life" access requirement will be managed solely through and undertaken by Portsmouth Water.	The Applicant has engaged extensively with Portsmouth Water throughout the development of the Project and continues to engage with Portsmouth Water on matters relating to construction and operational access to the joint infrastructure assets at Bedhampton Springs and the Havant Thicket Reservoir. The assets at the Bedhampton Springs site and Havant Thicket Reservoir will be operated and managed by Portsmouth Water, including access. This engagement will continue throughout the Examination process and, where appropriate, during the detailed design and delivery of the Project.
RR-087-4	Landowner engagement	Since 15-December 2025, I and Collective Residents of (redacted), Bedhampton have been in dialogue with Portsmouth Water, regarding Portsmouth Water's access-rights upon any of our Properties. Portsmouth Water's recent (1-June 2026) written response, explained: "We have not developed plans for potential works that would involve access via properties on (redacted). This is because it is very unlikely that we will require access, either during construction or operation of the pipelines. Furthermore, if needed, the plans would need to be developed in line with the particular circumstances	The Applicant is not party to discussions between the respondent and Portsmouth Water and is unable to provide a response.

Reference	Theme	Issue raised	The Applicant's response
		at the time, both in terms of the detail of the work we would need to complete and any needs residents / owners may have at that stage." For avoidance of doubt, this means that North Street's Property Owners and Collective Residents are not yet clear of what mitigation is / will be in place, for each of the five scenarios we provided Portsmouth Water in our correspondences since December 2025.	

Table 2-15 The Applicant's response to RR-088 from E101 Hub 4 Ltd

Reference	Theme	Issue raised	The Applicant's response
RR-088-1	Location of the proposed pipeline routes	The works proposed within this application intends to utilise land on which we will be emplacing a large-scale Battery Energy Storage System [BESS] facility. The application also intends to utilise further land within which associated HV cabling routes will be installed for integration of the BESS with the local electrical District Network Operator [Scottish & Southern Energy Networks].	The Applicant is aware of the planning application that E101 Hub 4 Limited has made in relation to a proposed Battery Energy Storage System (BESS) on land owned by Portsmouth Water. The application is made in relation to land that is required for the Project, and which has been included within the draft Order Limits for use for a construction compound since statutory consultation carried out in Spring 2025. The Applicant has worked extensively with Portsmouth Water to develop the Project, however it was not made aware of the conflict with the proposed BESS on this land until March 2026. The Applicant understands that the application for planning permission was submitted in April 2025, but this was not notified to the Applicant. No representations were made to the Applicant's statutory consultation in either Summer 2024 or Spring 2025 in respect of this conflicting proposal at a time when the draft Order Limits and construction compound location were being defined and consulted on in this location. It is concerning that the proposals for the Project in this location appear to have been overlooked by Portsmouth Water in supporting and facilitating the proposed BESS development, and the Applicant is seeking to understand how this occurred to ensure that the land required for the Project is effectively safeguarded from conflicting development. The Applicant will continue to engage with Portsmouth Water and E101 Hub 4 Limited to understand how the Project interfaces with the Bedhampton Springs site and the proposed BESS development, to understand if it is capable of being brought forward without interfering with the implementation of the Project.
RR-088-2	Landowner engagement	We hold legal rights over the land in question via a signed Option for Lease with the landowner.	The Applicant confirms E101 Hub 4 Limited have been included as an interest in the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1).
RR-088-3	Location of the proposed pipeline routes	The works proposed within this application will have a direct impact on our asset, an asset that should be considered critical national infrastructure, providing essential electrical distribution network support and grid balancing services for the local population / region.	The Applicant notes this comment. Please refer to RR-088-1. The required use of this land for the Project has been in the public domain since the 2024 statutory consultation, and the continued requirement for this land was known to Portsmouth Water through ongoing engagement on the development of the

Reference	Theme	Issue raised	The Applicant's response
			Project in the area of Bedhampton Springs. The Applicant is seeking to understand from Portsmouth Water how an option for lease has been granted for this land for development that is, on the face of it, wholly incompatible with the proposed use of the land for a construction compound. The Applicant, having now been made aware of the proposals, is seeking to understand the extent to which, if at all, the proposed BESS could be brought forward without interfering with the construction of the Project.

Table 2-16 The Applicant's response to RR-092 from Gateley Hamer Limited on behalf of Ei Group Limited

Reference	Theme	Issue raised	The Applicant's response
RR-092-1	The draft DCO	(Redacted) The dDCO seeks to acquire compulsory acquisition powers for permanent rights over this property. The rights being sought are excessive relative to what is required to execute and operate the scheme infrastructure and, on this basis, the compulsory acquisition powers should not be confirmed.	The Applicant disagrees that the rights sought are excessive. The powers sought in the draft DCO have been identified following the development of the Project design and are limited to those rights considered reasonably necessary for the construction, operation, maintenance and protection of the Project. The Applicant has sought, wherever practicable, to minimise interference with private land interests by acquiring rights rather than freehold interests and by limiting the extent of permanent rights to that required for the Project. The Applicant therefore considers the rights sought to be proportionate.
RR-092-2	Location of the proposed pipeline routes	1. The Order Limits in the dDCO take in more land than is required because detailed scheme design has not been undertaken (and won't be until the dDCO is confirmed). This means the promotor has deliberately built in a significant tolerance margin for the pipeline route.	The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The design of the Project as set out in the DCO application provides flexibility for refinement informed by further surveys and investigations at the detailed design stage. The detailed design will be developed following approval of the DCO application and the appointment of a Contractor. This approach ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-092-3	The draft DCO	2. The permanent rights being sought in the dDCO will enable the promotor to undertake surface level activities for subsurface level (>15m) infrastructure that is being delivered via tunnelling. We are told that the surface rights are required for monitoring equipment. If this is correct then these rights need only be temporary (or perhaps the landowner will accommodate via licence subject to negotiation and agreement). The promotor should be put to task on these matters as it would seem to violate the test of proportionality.	The Applicant confirms the respondent's plots are set in sheet 6 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2) shaded blue. The Applicant confirms that the plots are subject to tunnelling works with the rights and restrictions to be acquired by the Applicant set out in Schedule 5 to the Draft Development Consent Order [APP-023]. The rights and restrictions will be updated by the Applicant at a future deadline to make clear that they do not apply to the surface of the plots and that access will only be taken

Reference	Theme	Issue raised	The Applicant's response
		(Redacted)	underground through the tunnels once constructed via shaft locations at either end. The rights included within the draft DCO [APP-023] have been identified having regard to the anticipated requirements for the construction, operation, maintenance, monitoring, inspection, repair and protection of the Project, including infrastructure installed by trenchless construction methods. The Applicant must ensure that appropriate rights are secured for the lifetime of the Project and cannot rely on future agreement being reached with individual landowners or on licences being available when access is required. The Applicant has sought to minimise interference with private land interests by acquiring rights rather than freehold interests wherever practicable. The rights sought are limited to those considered reasonably necessary to facilitate the construction, operation, maintenance and protection of the Scheme and to ensure access can be obtained if required. Accordingly, the Applicant does not consider that the acquisition of the proposed permanent rights violates the principle of proportionality.
RR-092-4	The draft DCO	The dDCO seeks to acquire compulsory acquisition powers for temporary rights to use land (and suspend existing rights). The dDCO states that these rights are required to deliver Work No. 1-10 which covers all the authorised works in the dDCO (Schedule 1). We have requested more specific detail about the requirement for the land and reserve the right to make further representations following a clearer idea of likely scheme impacts of the property.	The Applicant notes the request for further detail regarding the requirement for temporary possession powers. The Applicant will continue to engage with affected landowners and, where requested, provide plot-specific information regarding the anticipated use of land, recognising that the detailed design of certain elements of the Project will continue to evolve.

Table 2-17 The Applicant's response to RR-108 from LANDMAKER LTD on behalf of Gary Darrock

Reference	Theme	Issue raised	The Applicant's response
RR-108-1	Greeting	We are writing regarding a commercial interest in Land North of Kiln Lane and the northern extent of the pipeline.	The Applicant has noted this comment.
RR-108-2	The process of developing the Project	The proposals to date have not consistently incorporated comments or consultation responses.	The Applicant has had regard to all feedback made at consultations and during engagement outside of the consultation periods. Feedback was reviewed by subject matter experts to consider whether it would be reasonable and practicable to implement amendments to the design of the Project as suggested by feedback. The process the Applicant undertook to develop the design of the Project is set out in the Scheme Development Report [APP-073, APP-074, APP-075]. The consideration of relevant responses received to consultation and publicity has been set out in the Consultation Report [APP-029] in the following locations:

Reference	Theme	Issue raised	The Applicant's response

			• Summer 2024 Consultation
			  ○ Section 9.7 of the Consultation Report; and
			  ○ Appendix F.29 (The Applicant's response to feedback) [APP-047]
			• Spring 2025 Consultation
			  ○ Section 10.7 of the Consultation Report; and
			  ○ Appendix G.25 (The Applicant's response to feedback) [APP-050]
			• Autumn 2025 Consultation
			  ○ Section 11.7 of the Consultation Report; and
			  ○ Appendix H.9 (The Applicant's response to feedback) [APP-051]
			• Spring 2026 Consultations
			  ○ Section 12.7 of the Consultation Report; and
			  ○ Appendix I.13 (The Applicant's response to feedback) [APP-052]

RR-108-3	Location of the proposed pipeline routes	The alignment throughout, and in particular the reference to the land at Kiln Lane, threatens to cost the landowner multiple millions of pounds in lost revenue by sterilising land proposed for residential development. We have been working on proposals for a couple of years now, and we have offered justifiable solutions that would significantly lessen the impact of the pipeline and still ensure both the pipeline and reduced development extent are deliverable and palatable for the landowner and ourselves.	The Applicant has sought to avoid or reduce intersects with development sites that are subject to a live or approved planning application or allocated in local authority's adopted or emerging local plans. The Applicant has confirmed that no planning application has been made at this site, and the site is not allocated for residential development in Winchester City Council's adopted or emerging local plan. Therefore, it would not be reasonable for the design of the Project to be implicated when there is no certainty that a development will come forward in this location. The Applicant has reviewed the alternative alignments proposed in this location, and it is considered that these would introduce additional deliverability constraints and environmental impacts.
RR-108-4	Landowner engagement	The feedback to date has been, at best, incompetent and, at worst, unprofessional, with members of the collective either unable or unwilling to justify design decisions in a meaningful or justifiable manner. We have urgently requested more dialogue and information to help us mutually advance our ambitions for the land to be developed and your pipework.	The Applicant notes the respondent's comments regarding engagement during the development of the Project, however as detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken extensive engagement with landowners and considered all feedback provided throughout statutory and non-statutory consultation. The Applicant has sought to provide information on the Project as it has evolved and has considered feedback received from affected parties when refining the design. The Applicant notes that, in the case of this respondent, the requested information took long than originally anticipated to provide. This reflected the need to coordinate input from a number of disciplines across the Project and to undertake the necessary review and sign-off process prior to issuing the information. The Applicant has subsequently engaged further with

Reference	Theme	Issue raised	The Applicant's response
			the respondent since and prepared a technical note which was issued to the respondent's representatives on the 4 September 2026 providing responses to the questions raised. The Applicant recognises the importance of maintaining constructive dialogue with landowners, particularly where land is being promoted for future development. However, no planning application has been made at this site, and the site is not allocated for development in Winchester City Council's adopted or emerging local plan. Therefore, it would not be reasonable for the design of the Project to be implicated when there is no certainty that a development will come forward in this location. Route selection and design development have been informed by a wide range of considerations, including environmental constraints, engineering requirements, operational resilience, constructability, impacts on existing land uses and interactions with third-party assets. The rationale for the selected route and design evolution is set out within the Scheme Development Report [APP-073, APP-074 and APP-075]. The Applicant remains willing to discuss voluntary agreements and is continuing to engage with the respondent and the landowner regarding their feedback and comments on the Heads of Terms.
RR-108-5	Landowner engagement	We also find it extremely disappointing that there is no facility to upload plans so that key information and drawings are readily available to you and you can better understand the context and the proactive nature with which we are trying to engage with you.	The Applicant notes the concern raised but wishes to confirm that the respondent is able to upload plans and documents as part of comments submitted into the examination. Please see the government guidance for Nationally Significant Infrastructure Projects: "Advice for submitting representations or comments". The Applicant welcomes plans, information or drawings from the respondent for the Applicant's further consideration. The Applicant also confirms that the respondent has been engaging with the Applicant directly via email, where plans and key information have been shared. The Applicant has sought to ensure that affected landowners and their representatives have access to information relating to the Project throughout the consultation and pre-application process. This has included the publication of consultation materials, plans and supporting information, attendance at consultation events, landowner meetings, and direct correspondence with affected parties and their professional representatives. Relevant project plans and application documents have also been made available through the DCO consultation process and subsequent application documentation. The Applicant acknowledges that landowners and developers may wish to share additional plans and proposals relating to their land interests, particularly where land is being actively promoted for development. The Applicant has considered information provided by affected parties where available and has continued to engage with landowners, developers and their advisers to understand development aspirations and assess potential interactions with the Project. In a number of cases, project design refinements and route reviews

Reference	Theme	Issue raised	The Applicant's response
			have been undertaken following receipt of landowner and stakeholder feedback. The Applicant remains willing to review information and plans provided by affected parties where these are relevant to the assessment of Project impacts or ongoing discussions regarding mitigation, accommodation works, route refinement or land rights. The Applicant will continue to engage constructively with the respondent and their representatives throughout the Examination process. It remains the Applicant's preference to work collaboratively with affected parties and seek solutions that appropriately balance the delivery requirements of the Project with private land interests wherever reasonably practicable.

Table 2-18 The Applicant's response to RR-109 from Gary Underwood

Reference	Theme	Issue raised	The Applicant's response
RR-109-1	Principle of development	I object to the Southern Water proposal to pump recycled effluent to the Havant Thicket Reservoir	The Applicant notes the respondent's position. The water that will be transferred to Havant Thicket Reservoir from the Water Recycling Plant would be highly purified recycled water, not treated wastewater. Treated wastewater would undergo internationally established advanced multi-barrier treatment processes prior to blending with spring water in Havant Thicket Reservoir and transfer for final treatment at Otterbourne Water Supply Works, as described in Environmental Statement (ES) Chapter 3 Description of the Proposed Development [APP-082].
RR-109-2	Attitudes to water recycling	Which Southern Water customers will be drinking even though it has been treated.	Water supplied to customers would continue to be required to meet statutory standards for safety, taste and quality, as regulated by the Drinking Water Inspectorate (DWI). Water supplied to the public would meet these high safety and quality standards, being subject to rigorous regulatory oversight, including comprehensive risk assessment, advanced multi-barrier treatment processes and continuous monitoring to ensure compliance with the Water Supply (Water Quality) Regulations 2016. The Applicant recognises that public perception and trust are essential and is committed to ongoing engagement to communicate how effective water recycling technology can produce wholesome drinking water. With these measures, the public can have confidence in the safety and reliability of the water supplied. Consultation on the Project was carried out in accordance with the statutory requirements under the Planning Act 2008 and was not intended to identify or consult every customer who may later receive water from the Project. Consultation under the Planning Act 2008 regime is focused on the Project and its impacts. Targeted engagement with customers affected by a change of

			source will be undertaken closer to switch-on, when supply areas and operational information are sufficiently mature to support effective communication. This approach has been communicated through the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process and supported by RAPID as the most appropriate means of ensuring customer engagement is undertaken when information is sufficiently developed to be accurate, proportionate and meaningful.

Table 2-19 The Applicant's response to RR-116 from Ian Judd and Partners on behalf of Graham Arturi

Reference	Theme	Issue raised	The Applicant's response
RR-116-1	Greeting	please see supporting email for details of the Relevant Representation. Relevant Representation Prepared on Behalf of Graham Antonio Arturi In Relation to Hampshire Water Transfer and Water Recycling Project 1. Key Information Name of Interest party: Graham Antonio Arturi Address: [REDACTED] Email Address: [REDACTED] Telephone Number: [REDACTED] Name & Address of Property Affected: North of Pricketts Hill, Wickham	The Applicant notes this comment.
RR-116-2	Landowner engagement	Land Plan Reference No: 15-019 15-020 Area of Acquisition Rights requested: 5 square metres 23219 square metres Area of Temporary Rights Requested: Nil Linear length of pipe: Approx 405m Use of Land: Agricultural - Improved Grassland and Water Meadow Interest Parties on my land: Land is Occupied by Graham Arturi Land Agent Instructed: Ian Judd and Partners, 4 High Street, Bishops Waltham, Southampton, Hampshire, SO32 1AB [REDACTED]@ianjuddandpartners.co.uk [MAP]	The Applicant notes this comment.

Reference	Theme	Issue raised	The Applicant's response
RR-116-3	Principle of development	2. Summary of Submission 2.1. I wish to become an interested party and submit my strongest objection to the Development Consent Order Application.	The Applicant notes this comment.
RR-116-4	Land use and agriculture	3. Land Use 3.1. I own approximately 103 acres (41.8 hectares) of land at Frith Farm, near Wickham. I grow and harvest hay from this land, which is sold locally for equestrian use.	The Applicant notes this comment. The assessment in Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091] recognises that agricultural land would be temporarily required during construction, during which time land within the Order Limits would be taken out of agricultural production and use. Following installation and completion of construction, the land would be restored to its pre-existing agricultural use, as set out in the Outline Soil Resource Management Plan (SRMP) appended to the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). The assessment specifically considers temporary and permanent impacts on agricultural land use, including disruption to land management activities, access arrangements, field drainage systems and field severance. Commitments secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) include maintaining access for landowners and occupiers, providing additional access points where reasonably practicable to mitigate field severance, relocating field supplies where required and continuing engagement with affected landowners throughout construction. Where agricultural business operations, agricultural land use activities or other functions linked to affected land are determined to be affected or interrupted, compensation would be payable in accordance with the relevant provisions of the DCO and the statutory compensation code.
RR-116-5	Principle of development	4. Principal of the Southern Water Scheme 4.1. I strongly object to the principle of the scheme, the mixing of human slurry/ wastewater, with clean water from Havant Reservoir for Human consumption. There is the possibility of contamination.	The water that will be transferred to Havant Thicket Reservoir from the water recycling plant would be highly purified recycled water, not treated wastewater. The water recycling process would include multi-barrier treatment, continuous monitoring and automated operational responses, including shutdown or diversion, to prevent non-compliant water entering Havant Thicket Reservoir.
RR-116-6	Attitudes to water recycling	4.2. The ability to remove chemicals, pharmaceuticals and recreational drugs from the "recycled" water is untested. Given Southern Waters track record with polluting our environment can they be trusted to ensure the water is safe for human consumption? How is this going to be monitored and policed?	Water recycling is a well-established and internationally proven technology that has been successfully implemented in countries such as the United States, Australia and Singapore for over 40 years. The development of the Project has included input from specialists who have worked on or collaborated with others on these well-established international schemes, ensuring that best practice has been embedded throughout the design and development of the Project. The Applicant has conducted extensive testing through its water recycling pilot plant with experts from the University of Brighton (Mayor-Smith,2024), [2] as referenced in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1). Testing has included analysis of pharmaceuticals and personal care products, pesticides, trace organic contaminants (including

Reference	Theme	Issue raised	The Applicant's response
			forever chemicals) and volatile organic compounds. Data from the Applicant's pilot plant trials has shown that the purified recycled water produced would provide a safe and sustainable source of supply that, following further treatment to drinking water standards at Otterbourne Water Supply Works (Otterbourne WSW), will continue to meet the strict water quality standards required by the Drinking Water Inspectorate (DWI). Any trace amounts of recreational drugs in the highly treated wastewater from Budds Farm Wastewater Treatment Works (Budds Farm WTW) would be removed by the processes to be employed by the Project. The Applicant recognises that broader concerns about water company performance and pollution incidents have affected public confidence and has implemented a Turnaround Plan (2023–2025) focused on improving operational performance, reducing pollution incidents and enhancing customer service. Since 2020, pollution incidents have reduced by 38% and leakage has reduced by 10% since 2023. These wider performance improvements do not replace the Project-specific safeguards but they demonstrate the Applicant's broader programme to improve operational performance and rebuild public trust. Furthermore, the Project would not rely on trust alone: it would be subject to independent regulatory oversight, statutory drinking water quality requirements, environmental permitting and detailed operational controls before recycled water could be used as part of public water supply. The water recycling process would include advanced multi-barrier treatment, continuous monitoring and automated safeguards, with the final water supplied to customers required to meet the same statutory drinking water standards as any other source. The Applicant remains committed to transparency, rigorous monitoring, and full compliance with all relevant regulations throughout the development and operation of the Project.
RR-116-7	Landowner engagement	5. Southern Waters Conduct to date 5.1. We have been bitterly disappointed in Southern Waters conduct to date. They, via their agents, have been rude, incompetent and threatening from the start. They have shown disrespect to me and my land, often not turning up for surveys. 5.2. We took part in the public consultation in 2024 & 2025, yet our concerns have never been taken seriously and have never been addressed. The public consultation was just a formality that Southern Water gave lip-service to. 5.3. Southern Waters communication has been poor, they haven't listened, they haven't truly engaged, they have been most aggressive, constantly threatening court and legal action, if we do not allow access. They have entered any form of negation to allow surveys on our terms, the choice was: accept their dictated position or they would get a Statutory Notice or court order. This is not how to work with landowners.	The Applicant does not recognise the accusations levelled at its approach to landowners. The Applicant appreciates the inconvenience that may be caused by not attending scheduled surveys and apologises where such inconvenience has been caused. Landowners were notified in advance of survey visits and whilst the Applicant intended to undertake surveys as per the planned programme of works, circumstances arose that required changes to be made to the timings. For example, adverse weather conditions resulted in last-minute changes. The Applicant confirms that consultation responses were received from the respondent at both the 2024 and 2025 consultation events. The Applicant wrote to the respondent on 3 December 2025 with a response to this feedback addressing the points raised by the respondent. Further information can also be found within the Consultation Report [APP-029]. During discussions with landowners, the Applicant has acted responsibly in making landowners aware of the statutory alternatives available should voluntary agreements not be reached. In relation to surveys, the use of

Reference	Theme	Issue raised	The Applicant's response
		5.4. There has been inadequate engagement with Landowners to truly understand landowner's concerns and there has been a failure to negotiate constructively.	statutory powers under Section 172 of the Housing and Planning Act 2016 has been referenced to ensure the respondent is aware of the statutory powers available but confirms that these would only be relied upon following reasonable attempts to secure access by voluntary agreement. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with the respondent regarding a voluntary agreement. To facilitate collective engagement on voluntary agreements, a number of professional representatives, including the respondent's representative, formed a Land Agent Group in February 2025. The Applicant issued draft Heads of Terms to the Land Agent Group on 3 February 2025 and subsequently engaged in negotiations on the terms. This engagement included in-person meetings with the Land Agent Group and several revisions to both the Heads of Terms and the commercial offering in response to feedback received. Following these discussions, the Applicant issued Heads of Terms to the respondent on 6 March 2026. Following issuing the Heads of Terms to the respondent. the Applicant attended a meeting with the respondent's representative on 13 May 2026 to discuss the voluntary agreement, offered updated terms on the 7 August 2026 and followed up on the updated offer on the 11 September 2026. The Applicant also met with the respondent on 20 October 2026 to discuss Heads of Terms and the Project. The Applicant confirms that it is their preference to secure voluntary agreements for the acquisition of land and rights wherever possible.
RR-116-8	Location of the proposed pipeline routes	6. Alternative Route 6.1. Southern Water have not considered alternative routes. I propose an alternative route to avoid my neighbour's residential property and avoid the steep sand bank, as shown in yellow below. 6.2. The most appropriate route would be through the South Downs National Park, which would avoid the semi-urban fridge and be through large arable fields with chalk soils. Its considerably shorter, less disruptive and much cheaper to construct. [MAP]	The Pipeline route has been designed using an extensive route selection process as set out in the Scheme Development Report [APP-073, APP-074, APP-075]. In this area, key considerations for the Pipeline route selection were the South Downs National Park to the east, and residential areas and woodland around Shedfield to the west. The alternative route proposed would require construction of the Pipeline along approximately 175m of Pricketts Hill. This would adversely impact the local highway network as this road would need to be shut for a long period of time, because laying a pipe of this size in the highway would be heavily constrained by the limited space available. Additionally, this section of Pricketts Hill is heavily vegetated by large trees, which may need to be removed to accommodate construction works. As set out in the Scheme Development Report [APP-073, APP-074, APP-075], the Applicant considered pipeline corridors through the South Downs National Park, however national parks are afforded a very high level of protection in national planning policy, including the National Policy Statement for Water Resources Infrastructure. As a result of this, the Project selected pipeline corridors that did not intersect with the South Downs National Park.

Reference	Theme	Issue raised	The Applicant's response
RR-116-9	Land use and agriculture	7. Minerals and Sand 7.1. My land is classified by the Provisional Agricultural Land Classification as Grade 2 soils. The scheme should avoid prime agricultural land. 7.2. The soils on the southern bank are very sandy, with running sand. It is going to be impossible to dig an open trench without shuttering the walls. This will be very dangerous to leave trenches open, for both workers and anybody trespassing on the site. 7.3. It is unclear how Southern Water will stop sand erosion, when a trench is dug the running sand will flow to the bottom of the hill, causing significant erosion.	The Applicant notes the representation regarding the presence of Grade 2 agricultural land and sandy ground conditions in the vicinity of the Project. The effects of the Project on agricultural land quality and soils have been assessed in ES Chapter 12 Land use and agriculture [APP-091]. The assessment identifies the extent of temporary and permanent land take and considers effects on agricultural land, including Best and Most Versatile agricultural land where present. ES Chapter 12 Land use and agriculture [APP-091] confirms that permanent losses of agricultural land will be restricted to the locations of Above Ground Plant (AGP), and ES Appendix 12.1 Agricultural land quality [APP-169] confirms that best and most versatile (BMV) quality land is present at three of the four AGP sites (one of which also includes non-BMV land in Subgrade 3b). The permanent loss of BMV agricultural land resulting from the Project is around 1.6 hectares. All other BMV land subject to temporary disturbance will be reinstated to its original condition. Ground conditions, including the presence of sandy soils, have been assessed in ES Chapter 11 Land quality and ground conditions [APP-090]. The detailed construction methodology will be developed by the Contractor having regard to the ground conditions encountered, including the use of appropriate excavation support and safe systems of work where required. Construction activities will be undertaken in accordance with relevant health and safety legislation and industry standards. Potential effects arising from erosion, sediment movement and changes to surface water and groundwater conditions are assessed in ES Chapter 19 Water environment Document reference 6.1, DCO Volume 6, Version 1). Measures WE4 and WE5 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), require the preparation of a Construction Drainage Plan, which will include measures to manage surface water runoff and reduce the risk of sediment entrainment and erosion during construction. These measures are secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), and the corresponding requirements of the draft Development Consent Order [APP-023].
RR-116-10	Archaeology and cultural heritage	8. Historical Excavation of World War II Hurricane Aircraft 8.1. There is a Hawker Hurricane aircraft remains located within the order limits. The aircraft crash landed during the second world war. There have been several MOD approved archaeological excavations on the plane, with live ammunition found, along with intact merlin engine parts, cockpit controls and other aircraft fragments. 8.2. We believe this World Ward 2 remains should not be disturbed by the pipeline and an appropriate buffer of 250m should be placed around the crash site.	The Applicant notes this comment and the feedback provided regarding the location of the site of the crash of Hawker Hurricane N2608 within the Order Limits. Pipeline route alignment options in this area are constrained (discussed at RR-116-8 above), precluding opportunities to avoid the crash site, which comprises not only the impact crater but also a spread of smaller debris to the north and east of the crash site. The circumstances of this crash, in which the pilot escaped unhurt, and the wreckage was recovered by the Royal Air Force shortly after the crash, means that the sensitivity of any remaining wreckage is limited. In consultation with the Ministry of Defence Joint Casualty and Compassionate Centre, it was

Reference	Theme	Issue raised	The Applicant's response
			agreed that excavation of the complete crash site was preferable to partial avoidance; allowing for fuller recovery of information about the crash by archaeological investigation secured by the Outline Written Scheme of Investigation (Document reference 7.6, DCO Volume 7, Version 1). This agreement is captured at Item MOD-ES-003 of the Draft Statement of Common Ground with the Ministry of Defence [APP-071].
RR-116-11	Landowner engagement	9. Need for Compulsory Purchase Powers 9.1. The Department for Communities and Local Government, Planning Act 2008, Guidance related to Procedures for the compulsory acquisition of land (CA Guidance), sets out the requirements Acquiring Authorities should meet to be granted CPO powers. 9.2. Para 6. "provides that a development consent order may only authorise compulsory acquisition if the Secretary of State is satisfied that: - the land is required for the development to which the consent relates, or is required to facilitate, or is incidental to, the development,". 9.3. Para 8. "The applicant will also need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate".	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent a. Under Section 122 of the Planning Act 2008 (PA 2008), a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance.
RR-116-12	Landowner engagement	9.4. Para 9. "The applicant must have a clear idea of how they intend to use the land which it is proposed to acquire. 9.5. Para 11. Section 122 of the Planning Act sets out two conditions which must be met to the satisfaction of the Secretary of State before compulsory acquisition can be authorised. The first of these is related to the purpose for which compulsory acquisition is sought. These three purposes are set out in section 122(2): (i) the land is required for the development to which the development consent relates. For this to be met, the applicant should be able to demonstrate to the satisfaction of the Secretary of State that the land in question is needed for the development for which consent is sought. The Secretary of State will need to be satisfied that the land to be acquired is no more than is reasonably required for the purposes of the development. (ii) the land is required to facilitate or is incidental to the proposed development. An example might be the acquisition of land for the purposes of landscaping the project. In such a case the Secretary of State will need to be satisfied that the development could only be landscaped to a satisfactory standard if the land in question were to be compulsorily acquired, and that the land to be taken is no more than is reasonably necessary for that purpose, and that is proportionate.	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the PA 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance. The Applicant's proposed use of the land is set out in the Works Plans [AS-008] with detail of each Works Number set out in 'Schedule 1 – Authorised Development' to the draft DCO [APP-023]. The respondent is affected by 'Works No.4 – Pipeline between the WRP site and Otterbourne WSW' for which the Applicant is seeking the acquisition of rights as set out in the Land Plans (Document reference 2.2, DCO Volume 2, Version 2). The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures

Reference	Theme	Issue raised	The Applicant's response
			efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-116-13	Location of the proposed pipeline routes	9.6. We believe that part of the land included within the order limits is not necessary to facilitate the scheme and the volume of land taken is not proportionate to the needs of the project. 9.7. On our property the order limits extending to 5.74 acres for 405 linear meters of pipe, which equates to an average of 57.35m in width, with a maximum width of around 85m. 9.8. The Acquiring Authority have not provided any justification for the scale/quantum of the Order Limits. They have stated (Para 3.3.3 Document Reference 4.1) that the maximum working width is 40m. Yet later (para 3.3.1 Document Reference 4.1- please note numbering error in document) the working width may be up to 50m. 9.9. We understand that Southern Water have chosen not to undertake detailed design and want an element of "flexibility"□. It is clear that the scale of the Order Limits is significantly more than is reasonably necessary or proportionate for a pipe that 0.8m in width.	The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs. The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m for a maximum length of 42m. Please also refer to the response to RR-116-15.
RR-116-14	Location of the proposed pipeline routes	9.10. We believe the Order Limits should be significantly reduced to a maximum of 20m. 9.11. A huge amount of Southern Water's flexibility is due to the fact that they haven't undertaken detailed design of the pipe, due to the cost and uncertainty. However, this adds significantly greater uncertainty for the landowners. I believe the DCO should be put on hold/refused until the detailed design has been completed, giving Southern Water and Landowners confidence the land to be taken is no more than is reasonably necessary for that purpose, and that is proportionate. 9.12. If the Acquiring Authority require greater area for unnecessary off-site storage, they can rent commercially available space offsite. It is unreasonable to use compulsory purchase rights to take peoples land (without payment of rent), if they can rent storages spaces locally or even from the landowners at commercial terms. 9.13. There is nothing within their submission that provides a justification for this excessive width of the order Limits.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide the necessary space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas, and enable safe and efficient construction operations. This is set out at section 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. The design of the Project as set out in the DCO application provides flexibility for refinement informed by further surveys and investigations at the detailed design stage. The detailed design will be developed following approval of the DCO application and the appointment of a Contractor. This approach ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.

Reference	Theme	Issue raised	The Applicant's response
			If part of the required construction storage were to be located off-site, this would significantly increase the duration of construction works and the number of construction vehicle movements on the highway network. Both of these factors would result in adverse impacts on the environment and local communities. Please also refer to the response to RR-116-15.
RR-116-15	Location of the proposed pipeline routes	10. Scale of the Working Area 10.1. The justification for the working width is lacking any reality, below is an exact Graphic 3-3 Para 3.5.92 document Reference 6.1. [GRAPHIC]	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, which is secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide the necessary space for a haul road, construction working areas, material storage areas, pipeline trench and soil storage areas. This is set out at section 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m, over a distance of a maximum of 42m. The haul road/working area must be a sufficient width to allow a suitably sized excavator to track back at 90 degrees to the pipe to lift it and then lower into the trench. A suitably sized excavator capable of carrying out a tandem lift of a string of pipes would circa 11m long hence the 11m required. The working area for the trench excavation is calculated using the width of the excavator capable of pipeline installation (circa 3.5m) and a 2m deviation of the pipeline route in each direction without compromising the pipelaying process. If the pipeline has to change direction the joints are designed to allow a slight angle deviation to alter the direction this is a gradual process and requires sufficient space to allow for it. Therefore, a total of 7.5m. The pipe storage/jointing area must be wide enough to allow the pipes to be welded together to form the strings before lowering into the trench. As there will be welders working on this while the excavator is operating a 1m safety exclusion zone has to be in place. The total of the pipe storage/jointing area is therefore a total of 3.5m The area required for topsoil storage is based on topsoil being 200mm thick, which equates to $8m^3$ for a 40m working width. With a side slope of 1:1 and maximum height of 1.8m an area of 7m has been allocated which includes for any bulking factor. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The area required for subsoil provides enough width in this area to segregate upper and lower subsoils, therefore there would be two separate mounds, which ensures the subsoil can be reinstated properly. A 1:1 side slope and a bulking factor has been incorporated which equates to 7m. Either side of the

Reference	Theme	Issue raised	The Applicant's response
			stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The above areas equate to a working width of 40m.
RR-116-16	Location of the proposed pipeline routes	10.2. This has a "Working Area and Haul Road" of 11m and a pipe trench 4m wide. This is excessive, yet only totals 15m in width. They want a further 25m for topsoil and subsoil storage.	Please refer to the Applicant's response to RR-116-15.
RR-116-17	Location of the proposed pipeline routes	10.3. I have undertaken a simple calculation of what may be needed as a working width - The Haul Road may be 3m wide, with occasional passing places, - Working area 8m, this allows 6m of digger working area, plus 2m pipe storage - Pipe width - this will be 1.5m plus say 1.5m each side of pipe = 4.5m - Topsoil Storage - A fair estimate is to assume 150mm of top soil, across 20m equates to 3m³ of top soil, stacked at 1:2, say 2.5m x 1.25m = 3.75m³, therefore 2.5m for topsoil storage. - Sub-soil Storage - If the trench is 4m wide and assume a depth of 2m (2.15m below ground level) deep 7.5m³ of subsoil, again assume 1:2 stack equates to 4m of subsoil storage. - Excess 2m excess for fencing and other uses - Total working area required - 24m in width	Please refer to the Applicant's response to RR-116-15.
RR-116-18	Location of the proposed pipeline routes	10.4. It is completely unjustified, unreasonable and unnecessary for the purpose, and disproportionate to permit a working area greater than 24m in width for open cut sections of pipe.	Please refer to the Applicant's response to RR-116-15.
RR-116-19	Landowner engagement	10.5. If Southern Water wish to use additional space this can be done by agreement at a market rent with individual landowners.	The Applicant has been seeking voluntary agreements for all land identified for temporary use. Details of this engagement can be found within the Land and Rights Negotiations (Document reference 4.4, DCO Volume 4, Version 1). As detailed within the Statement of Reasons [APP-025], temporary possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the project. Whilst the Applicant's preference is to reach a voluntary agreement, it considers that the temporary possession powers sought within the DCO are necessary to ensure that the project can be delivered where agreement cannot be reached. Reasonable losses incurred by landowners arising out of the temporary use of land will be reimbursed in line with the Compensation Code.

Reference	Theme	Issue raised	The Applicant's response
			The Applicant therefore considers that the temporary possession powers sought are justified and proportionate, whilst maintaining that a voluntary agreement remains its preferred outcome where possible.
RR-116-20	Location of the proposed pipeline routes	11. Scale of Easement Width 11.1. We haven't been provided with any justification of the easement width restriction. Southern Water requested a 11m easement for open cut, being 5.5m each side of the pipe, with permanent restriction place on this land. Yet for tunnelled section the easement has been reduced to 2.5m each side of the pipe.	The purpose of the easement is to protect the integrity and operational requirements of the pipeline and to ensure appropriate access for inspection, maintenance, repair and replacement activities. The required width has been determined following a detailed technical assessment, taking account of the pipeline's diameter, depth, construction methodology, location and operational function. For sections of pipeline installed using open-cut construction, the Applicant is seeking an easement width of 11m (5.5m either side of the pipeline). This reflects the access and operational requirements associated with maintaining and, if necessary, excavating the pipeline in the future. Notably, this represents a reduction from the Applicant's published stand-off guidance for water mains of a comparable size and depth [1], which would typically require a wider protected corridor. This reduction from the normal requirement has been communicated to landowners and their agents where this is being challenged. For sections constructed using trenchless techniques, a reduced easement width is considered appropriate, taking into account depth, construction methodology and location. As the pipeline is installed at greater depth and future maintenance or operational access would be undertaken from either side of the trenchless section rather than directly above it, the same level of restriction is not required. The easement width has therefore been tailored to reflect the differing operational requirements of the construction methodologies. The Applicant is therefore satisfied that the easement widths proposed represent the minimum reasonably required to protect the pipeline and secure its safe operation over its lifetime. In accordance with the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition have been met. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits, whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) sets out the maximum diameter of the pipelines for the different Project components, which may be greater than the 800mm referenced by the Respondent. The Applicant considers the permanent rights sought are justified in order to protect and preserve the integrity of the Project.

Reference	Theme	Issue raised	The Applicant's response
RR-116-21	Location of the proposed pipeline routes	11.2. We have assessed other water providers easement width and the typical easement width for an 800mm pipe is 8m total width. 11.3. We have requested justification for this easement width; this hasn't been supplied. We therefore believe this is unreasonable, unjustified and disproportionate and should be reduced.	Please see the Applicant's response to RR-116-20.
RR-116-22	Landowner engagement	12. Private Negotiations and Alternative to Compulsory Purchase 12.1. We understand that it is not for the planning Inspectorate to comment on the terms of any private negotiated agreements. We must comment that Southern Water have been impossible to work with. They have dictated terms, without giving any consideration to amending the terms. The terms offered are significantly worse that those under compulsory acquisition. 12.2. Paragraph 25. of CA Guidance states "Applicants should seek to acquire land by negotiation wherever practicable. As a general rule, authority to acquire land compulsorily should only be sought as part of an order granting development consent if attempts to acquire by agreement fail". 12.3. Southern Water are only playing lip-service and have no intention of reaching any form of settlement with Landowners and Occupiers. Their only intent is to use excessive CPO powers, as they deem this easier and cheaper than reaching private agreements.	The Applicant does not recognise the accusations levelled at its approach to voluntary negotiations. The Applicant remains committed to working collaboratively with landowners and disagrees with respondent's suggestion that they have been unwilling to enter into any form of negotiations. The Applicant has made several amendments to the proposed Heads of Terms as confirmed by a relevant representation made by a member of the Land Agent Group [RR-233] and improved the commercial offer during the negotiations to demonstrate this preference. As detailed within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken extensive attempts to meaningfully engage with landowners on voluntary agreements and has continued to have productive discussions with them either directly or through their professional representatives. The Applicant is aware of the compulsory acquisition requirements outlined by the respondent and in accordance with the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition have been met. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance. The Applicant is committed to working collaboratively with landowners and it remains the Applicant's firm preference to reach a voluntary agreement for the acquisition of land and rights where possible.
RR-116-23	Landowner engagement	12.4. This is apparent from the Pre-application Land and Rights Negotiation Tracker (Document 4.4) only 1 landowner has returned Heads of Terms out of 172 Category 1 Landowners. The one that has been returned is a middle section of a drill section, so no above ground access is needed. 0.58% sign up rate, clearly demonstrates that Southern Water have not made any significant effort to reach agreement with Landowners and Interested Parties and they are relying on taking land by compulsion. Not a single Option Agreement has been entered into. 12.5. I believe it is disingenuous to categorize me as "Head of Terms negotiation ongoing" (yellow status). This is not true, Southern Water have shown no interest in reaching an agreement with us. I request that my status is	Whilst the Applicant would prefer to be able to advise the Examining Authority of a higher return of signed Heads of Terms, it does not consider this to be because the terms offered to the respondent are unreasonable. To date, despite formally requesting evidence demonstrating why the commercial offer is considered unreasonable on 28 January 2026, the Applicant is yet to receive a response. The Heads of Terms proposed by the Applicant closely align with those adopted across other utilities and infrastructure projects, which have also been reviewed and accepted by respective land agent groups. The status recorded for the respondent in the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1) does not indicate that voluntary agreement is agreed. Given that Heads of Terms for a voluntary agreement have been issued and are being discussed with the respondent's representative, the status has been reflected accordingly.

Reference	Theme	Issue raised	The Applicant's response
		amended to "Heads of Terms agreements unlikely before close of examination (red)". 12.6. We do not believe that Southern Water should be granted CPO Powers, as they have not sufficiently exhausted trying to reach agreement on voluntary terms. We think the DCO should be put on-hold until 90% of landowners have reached a voluntary agreement.	Following the Heads of Terms being issued on 6 March 2026, the Applicant discussed the Heads of Terms with the respondent's representative at a meeting on 13 May 2026. Following this, the Applicant requested a further meeting on 17 July 2026 and, after issuing revised Heads of Terms on 7 August 2026 incorporating amended provisions and improved commercial terms, sought an additional meeting with the respondent's agent on 11 September 2026 and met with the respondent on 20 October 2026, evidencing the Applicant's attempts to reach a voluntary agreement. In accordance with the Statement of Reasons [APP-025], the Applicant considers that the relevant tests for compulsory acquisition have been met. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance.
RR-116-24	Land use and agriculture	13. Land Quality and Water Logging 13.1. The sand bank is very free draining, however the water meadows are a bog all winter. They will be impassable for 5 months of a normal year. We wouldn't take a tractor onto our land between November and March, as they will get stuck. 13.2. We believe it will be impossible to work on the land for 4 to 5 months of the year, particularly when the top soil has been stripped and the subsoils compacted with heavy machinery. There is insufficient information within the applicant's submission as to how they are going to deal with this issue. How are they going to stop soil erosion and water and sediment runoff to the local streams and ditches.	The Applicant acknowledges the concern regarding waterlogged ground conditions, the potential for soil compaction and the risk of erosion and sediment runoff during construction. A Soil Resources Management Plan (SRMP) will be in effect for the duration of the construction and operation phases of the Project. An Outline SRMP is provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), and includes protocols for determining appropriate soil handling conditions in relation to soil moisture state and rainfall criteria. The soils will be managed according to industry good practice to minimise damage caused to soils, including through compaction by machinery. The Outline SRMP also includes measures relating to soil handling, storage and reinstatement to minimise the risk of soil erosion and sediment runoff. Section B.10 of the Outline SRMP details that any defects identified in reinstated soils will be ameliorated by the Contractor. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), notes that a Construction Drainage Plan will be prepared by the Lead Contractor. Measure WE4 provides for changes in run-off to be attenuated and released at a controlled gate, and WE5 states that the Construction Drainage Plan will incorporate measures to reduce or remove the risk of sediment entrainment, including but not limited to: limiting the extent of open excavations at any one time and reducing subsoil exposure, retaining vegetated strips on the edge of working areas, and the incorporation of interceptor drains for the settlement of sediment.
RR-116-25	Land use and agriculture	13.3. Landowners/farmers know their land best. They need a mechanism to stop the Southern Water contactors if the ground conditions become detrimental to work in.	The Applicant notes the concern regarding soil handling and construction activities during unsuitable ground conditions. The Outline SRMP at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), acknowledges that the main adverse impacts on soils during construction occur as a result of handling

Reference	Theme	Issue raised	The Applicant's response
			in inappropriate conditions, notably when the soils are too wet. Paragraphs B.9.1 to B.9.14 of the Outline SRMP set out the methods for determining appropriate soil handling conditions and criteria for when soil handling may or may not take place, and specify that soil handling should only take place in suitable soil moisture and weather conditions.
RR-116-26	Land use and agriculture	14. Land drainage 14.1. We have land drainage on the farm, being old clay tiled drains. We need reassurance that the drains are property reinstated.	The Applicant notes the concern that agricultural field drains may be damaged during construction. The Outline SRMP provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), notes at paragraph B.2.16 that the Agricultural Liaison Officer will be responsible for a number of roles, including the coordination of drainage surveys and keeping landowners informed of pre- and post-construction drainage schemes. Measures WE4 and WE5 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), note that a Construction Drainage Plan will be prepared by the Contractor, which will be informed by baseline drainage surveys undertaken by a specialist drainage contractor, to locate drains and to ensure appropriate reinstatement. The Applicant considers that appropriate measures to protect and/or reinstate agricultural field drains are in effect.
RR-116-27	Principle of development	15. Conclusion 15.1. For the reasons set out above, I maintain my strongest objection to the Development Consent Order as currently proposed. Southern Water has not demonstrated that the compulsory acquisition powers sought are necessary, proportionate, or limited to the minimum land reasonably required. The order limits, working widths, easement widths and compound areas are excessive and inadequately justified, particularly given the absence of detailed design and the availability of alternative routes, reduced working areas and commercial off-site storage options.	As set out in above responses, the Applicant has sought flexibility to ensure the contractor can innovate and find efficiencies when developing the detailed design of the Project. Construction will be undertaken in line with the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). which will limit the extent of working areas. From an engineering perspective, the land requirements along the pipeline corridor are driven by the need to safely construct, operate and maintain the infrastructure. This includes provision for pipeline installation, excavation, haul roads, temporary access, segregation and storage of topsoil and subsoil, construction plant, environmental mitigation, and reinstatement activities. The standard maximum working width for open-cut pipeline construction is 40m, with reduced widths applied where appropriate. In constrained locations, temporary widening may be required over limited lengths to facilitate the safe storage of excavated materials and construction activities. The draft Order Limits also provide for limits of deviation, temporary works, environmental mitigation and enhancement measures, access requirements and flexibility necessary to accommodate detailed design development and delivery of the scheme following consent. The Project has been assessed on a Rochdale Envelope basis to ensure environmental effects have been assessed against a robust worst-case scenario whilst retaining appropriate design flexibility.

Reference	Theme	Issue raised	The Applicant's response
			The justification for compulsory acquisition powers, easement requirements, Order Limits and land interests sought is set out within the DCO application documentation and should be considered in the context of the overall land and planning case for the Project.
RR-116-28	Land use and agriculture	15.2. The scheme would cause significant and unnecessary impacts on my agricultural land, including disruption to hay production, risks to soil structure and drainage, potential erosion of sandy ground, impacts on waterlogged areas, and disturbance to a historically important World War II aircraft crash site. These matters have not been properly addressed in the application, nor has Southern Water engaged constructively with me as landowner and occupier. 15.3. I therefore request that the Examining Authority and Secretary of State refuse the compulsory acquisition powers sought in relation to my land or alternatively defer the application until Southern Water has completed detailed design, properly assessed alternative routes, reduced the land take to what is strictly necessary, and entered into genuine negotiations with affected landowners on reasonable voluntary terms.	The Applicant notes the landowner's concerns regarding disruption to hay production, soil structure and drainage, erosion, waterlogged ground, and effects on agricultural operations. The concerns regarding the World War II aircraft crash site are addressed in the Applicant's response to RR-116-10. The Outline SRMP provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), notes that reinstatement of soils over the pipeline will be undertaken as soon as practicable after installation, and that the timing and management of reinstatement will be agreed with the landowner. Disruption to agricultural land and agricultural workings will be minimised. All soil handling will be subject to the good practice measures set out in the Outline SRMP, to be further developed in the detailed SRMP. Risks to soil structure and soil drainage will be avoided or minimised, and any defects identified post-construction will be ameliorated. The Applicant notes the comments regarding detailed design and route selection. As explained in RR-116-14, detailed design has not yet been undertaken in order to retain flexibility for the appointed contractor. The Pipeline route has been developed through an extensive route selection process, as described in the Scheme Development Report [APP-073, APP-074, APP-075 – 3 documents]. The Applicant's response to the proposed alternative route is provided in RR-116-8. The Applicant notes the concerns regarding compulsory acquisition powers and engagement with affected landowners. Matters relating to compulsory acquisition and negotiations with landowners are addressed separately through the application and associated land documentation.

Table 2-20 The Applicant's response to RR-120 from Hampshire and Isle of Wight Wildlife Trust

Reference	Theme	Issue raised	The Applicant's response
RR-120-1	Need case	Application Reference: WA010002 Project: Hampshire Water Transfer and Water Recycling Project (HWTWRP) Applicant: Southern Water Services Ltd Hampshire & Isle of Wight Wildlife Trust welcomes the opportunity to submit this relevant representation in respect of the Hampshire Water Transfer and Water Recycling Project. We recognise the importance of securing resilient water supplies in the face of climate change, population growth and increasing pressure on Hampshire's internationally important chalk streams and wetland	The Applicant notes and welcomes the conditional support for the Project. The Habitats Regulations Assessment - Stage 2 Appropriate Assessment and Marine Conservation Zone - Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2) concludes that, subject to the application of secured mitigation and management commitments, the Project would not result in an adverse effect on integrity of the Habitats Sites either alone or in-combination with other plans or projects. On this basis, no further stages of the HRA process are required.

Reference	Theme	Issue raised	The Applicant's response
		environments. Hampshire & Isle of Wight Wildlife Trust recognises the strategic need to improve water resource resilience and reduce abstraction from environmentally sensitive chalk streams. However, support for the proposed development is contingent upon the applicant demonstrating beyond reasonable scientific doubt that the scheme will not result in adverse effects on the integrity of designated sites, deterioration of protected habitats, or undermine nature recovery objectives.	As summarised within ES Chapter 21 Summary of likely significant residual effects [APP-100] there are no anticipated likely significant adverse effects are in relation to terrestrial and freshwater or marine biodiversity. The only significant effect would be a long-term major beneficial effect on statutory designated sites. Operation of the Project would reduce the requirement for water abstraction from the River Itchen Special Area of Conservation and Site of Special Scientific Interest and. This reduction in abstractions would help to maintain natural watercourse flow and contribute to the conservation objective of maintaining or restoring the structure and function of habitats and species.
RR-120-2	Terrestrial and freshwater biodiversity	The scheme must demonstrate that it avoids, mitigates and compensates for adverse impacts on biodiversity and that it delivers measurable environmental net gains. Given the scale of the proposal and its proximity to numerous internationally, nationally and locally designated sites. The applicant must clearly demonstrate, through robust evidence and application of the precautionary principle, that the project will not individually or in combination with other plans and projects result in adverse effects on the integrity of any SPA, SAC, Ramsar site or other designated sites. Where uncertainty remains regarding ecological outcomes, the Examining Authority should not rely on future mitigation or monitoring alone as justification for consent, unless clear trigger points, corrective actions and enforceable mechanisms are secured through the DCO.	The Applicant agrees with the need for the Project to demonstrate that it avoids, mitigates and compensates for adverse impacts on biodiversity and that it delivers measurable environmental net gains. ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) presents the impact assessment for designated sites and ES Chapter 20 Cumulative and in-combination effects [APP-099] considers other plans or projects in addition to the Project. Also, the Habitats Regulations Assessment - Stage 2 Appropriate Assessment and Marine Conservation Zone - Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2) includes an in-combination assessment. The HRA considers both the effects of the project alone and in-combination of construction activity, hydrological changes, water quality impacts and operational disturbance. Mitigation detailed in the HRA is secured via the OEMP [APP-422] and OCEMP – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1). The Applicant does not consider there to be uncertainty remaining regarding ecological outcomes, as reflected in the conclusions of the Habitats Regulations Assessment - Stage 2 Appropriate Assessment and Marine Conservation Zone - Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2).
RR-120-3	Terrestrial and freshwater biodiversity	Internationally Designated Sites The Environmental Statement identifies twelve internationally designated sites within 2km of the Order Limits or hydrologically connected to the scheme, including Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites. These include: 1. Solent and Dorset Coast SPA 2. Chichester and Langstone Harbour SP 3. Chichester and Langstone Harbour Ramsar 4. Solent Maritime SAC 5. South Wight Maritime SAC 6. Solent and Isle of Wight Lagoons SAC 7. Portsmouth Harbour SPA	The Applicant agrees with the Wildlife Trust that the internationally designated sites listed support important habitats and species. The Habitats Regulations Assessment - Stage 2 Appropriate Assessment and Marine Conservation Zone – Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2) considers both the effects of the project alone and in-combination of construction activity, hydrological changes, water quality impacts and operational disturbance. The HRA considers the effects listed by the Wildlife Trust. Applicant does not consider there to be uncertainty remaining regarding potential impacts on internationally designated sites, as reflected in the conclusions of the Habitats Regulations Assessment Stage 2: Appropriate Assessment.

Reference	Theme	Issue raised	The Applicant's response
		8. Portsmouth Harbour Ramsar 9. Solent and Southampton Water SPA 10. Solent and Southampton Water Ramsar 11. River Meon Compensatory SAC habitat 12. River Itchen SAC These sites support internationally important habitats and species, including estuarine habitats, coastal wetlands, wintering and migratory birds, chalk stream ecosystems and Atlantic salmon. Hampshire & Isle of Wight Wildlife Trust is concerned that the cumulative effects of construction activity, hydrological changes, water quality impacts and operational disturbance have the potential to affect the integrity of these designated sites. The Trust submits that the Examining Authority should be satisfied beyond reasonable scientific doubt that the Proposed Development, either alone or in combination with other plans and projects, would not result in adverse effects on the integrity of any internationally designated site. In particular we request that the Examining Authority carefully scrutinises: • Potential effects on hydrology and groundwater-dependent habitats; • Changes in water quality and nutrient dynamics; • Impacts arising from the transfer, treatment and storage of recycled water; • Impacts on functionally linked habitat supporting SPA bird populations; and • The adequacy of proposed mitigation, monitoring and contingency measures. Hampshire & Isle of Wight Wildlife Trust considers that the precautionary principle must be applied where uncertainty remains regarding potential impacts on internationally protected sites.	
RR-120-4	Terrestrial and freshwater biodiversity	Solent Waders and Brent Goose Strategy Sites The Environmental Statement identifies 81 Solent Waders and Brent Goose Strategy (SWBGS) sites within 2km of the Order Limits, including nine located within the Order Limits themselves and four sites directly affected by construction activities. These areas provide functionally linked habitat for internationally protected bird populations associated with the Solent SPAs and Ramsar sites. Particular concern arises regarding impacts to: • H90 at Budds Farm Wastewater Treatment Works. • H130 adjacent to the Water Recycling Plant site. • H08 at the proposed Water Recycling Plant site. • W03G at Portsdown Hill.	The Applicant agrees that the Solent Wader and Brent Goose Strategy (SWBGS) sites provide functionally linked land for internationally designated Special Protection Areas and these are considered as such within the ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) and the Habitats Regulations Assessment - Stage 2 Appropriate Assessment and Marine Conservation Zone - Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2)). The design of the Project has prioritised avoidance of impacts on designated sites and functionally linked land. Where this has been unavoidable, mitigation is proposed to ensure that there is no adverse effect on the structure, function or integrity of internationally designated sites during construction or operation. Mitigation measures proposed for SWBGS sites are detailed in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) and the Habitats Regulations Assessment Stage 2 - Appropriate

Reference	Theme	Issue raised	The Applicant's response
		The Trust is concerned that construction disturbance, temporary habitat loss and operational impacts could affect the use of these sites by overwintering birds. Functionally linked habitat should be afforded the same level of consideration as designated SPA habitat where it supports qualifying species. We therefore seek assurance that: • Avoidance of impacts has been prioritised before mitigation; • There will be no reduction in ecological functionality of affected sites; • Construction and operational disturbance will not materially affect qualifying species; • Sufficient compensation is secured where habitat functionality may be lost or degraded in advance of impacts occurring; • Compensation provides ecological value that is demonstrably equivalent to or greater than that being affected; and • Monitoring extends beyond the construction period and includes triggers for additional mitigation where bird usage declines.	Assessment and Marine Conservation Zone - Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2). This includes the three key elements which are secured in the Outline CEMP – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1), measure TFB23: • A bespoke mitigation approach for the loss of a low use SWBGS site (H08) will be delivered off-site by a third party. • The use of disturbance minimisation measures, such as visual screening and acoustic barriers, and monitoring in the form of watching briefs. • The application of seasonal constraints; carrying out construction activities (including enabling) outside of the wintering bird season at SWBGS site W03G. The bespoke mitigation approach will entail securing the management of an existing but infrequently available (because of farming practices) SWBGS candidate site (C7A), ensuring its suitability and availability on a long-term basis. This habitat will be of greater suitability for SWBGS bird species than the habitats lost and will provide the function that is to be lost. As stated 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), monitoring of the SWBGS mitigation site will be extended beyond the construction period and include triggers for remedial actions if required. Monitoring requirements of the off-site mitigation site will be specified within the management plan for the mitigation site. No compensation is considered to be necessary and this has been agreed with Natural England as set out in the draft Statement of Common Ground (Document reference 5.8, DCO Volume 5, Version 1).
RR-120-5	Terrestrial and freshwater biodiversity	Sites of Special Scientific Interest The Trust notes that thirteen Sites of Special Scientific Interest have Impact Risk Zones intersecting the Order Limits, including Chichester Harbour SSSI, Langstone Harbour SSSI, Portsdown SSSI, Portsmouth Harbour SSSI, Warblington Meadow SSSI, Lye Heath Marsh SSSI, Hook Heath Meadows SSSI, Titchfield Haven SSSI (not within 2km of the Order Limits but hydrologically connected), Waltham Chase Meadows SSSI, The Moors SSSI, Botley Wood and Everetts and Mushes Copse SSSI, Upper Hamble Estuary Woods SSSI and River Itchen SSSI. The Trust notes that there are: • 12 SSSI sites with biological interest within 2km of the Order Limits; • 8 SSSI sites hydraulically connected to the Order Limits, which are located further than 2km of the Order Limits; • 13 SSSI Impact Risk Zone within the Order Limits These sites represent some of Hampshire's most important ecological assets. Hampshire & Isle of Wight Wildlife Trust particularly notes the sensitivity of the	The Applicant recognises the importance of Sites of Special Scientific Interest (SSSIs). The Applicant confirms that all proposed mitigation, restoration and monitoring measures are set out in the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) and the Outline CEMP – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1) which are secured by Requirements in Schedule 2 to the Draft DCO [APP-023]. ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) presents the impact assessment for SSSIs and concludes no significant residual adverse effects as a result of the Project during either construction or operation. ES Chapter 20 Cumulative and in-combination effects [APP-099] considers other plans or projects in addition to the Project.

Reference	Theme	Issue raised	The Applicant's response
		River Itchen SSSI/SAC and welcomes proposals intended to reduce abstraction pressures in the longer term. Nevertheless, temporary construction impacts and operational risks require robust assessment and mitigation. Given the recognised national importance of these sites, the Trust considers it essential that all proposed mitigation, restoration and monitoring measures are secured through enforceable DCO requirements rather than relying solely upon outline management plans or future agreement. In particular, the Trust seeks assurance that no deterioration in SSSI condition will arise as a consequence of construction activities, operational activities or cumulative effects. The Trust requests that all commitments relating to water quality protection, pollution prevention, habitat restoration and ecological monitoring are secured through enforceable requirements within the Development Consent Order.	
RR-120-6	Terrestrial and freshwater biodiversity	River Test SSSI, River Itchen SAC and River Meon Catchment The Trust notes the particular sensitivity of the River Test SSSI, River Itchen SAC and the River Meon Compensatory SAC habitat, both of which support internationally important chalk stream ecosystems and associated species, including Atlantic salmon. The Trust submits that any risk of deterioration in water quality, groundwater connectivity, river flow regimes, geomorphological processes or ecological condition should be treated as a matter of significant concern unless demonstrably excluded through evidence. Hampshire & Isle of Wight Wildlife Trust notes that the River Meon Compensatory SAC habitat is crossed by the proposed pipeline using trenchless construction methods. While trenchless approaches may reduce direct impacts, the River Meon catchment supports chalk stream habitats and Atlantic salmon and requires the highest level of protection. We urge that the Meon is considered with the same level of protection and mitigation as the Itchen SAC, owing to its functional importance for Atlantic salmon using the Test, Itchen and Meon. Southern Water are aware that the chalk stream salmon of these rivers are genetically distinct and geographically restricted to chalk catchments, warranting a greater level of consideration in the planning of schemes such as this. We therefore seek detailed assurance that: • Groundwater pathways will not be adversely affected. • Construction risks have been fully assessed. • Effective contingency plans are in place should unexpected impacts occur.	The Applicant recognises the importance and sensitivity of the River Test SSSI, River Itchen SSSI and SAC and the River Meon and can confirm that the River Meon is considered as a receptor of Very High importance within ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1), the same as the River Itchen SAC, and is included within the Habitats Regulations Assessment Stage 2 - Appropriate Assessment and Marine Conservation Zone - Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2). The impact assessment within the ES Chapter 8 and the HRA Appropriate Assessment consider groundwater impact pathways, other pathways that may arise during construction such as air quality changes and disturbance and the potential for operational effects. Mitigation measures detailed in the Outline CEMP – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1) include controls for risks to groundwater, such as WE8 which secures the management of any unforeseen contamination in line with requirements of LQGC6. ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) and ES Appendix 19.2 WER compliance assessment (Document reference 6.2, DCO Volume 6, Version 1) present an assessment of the potential construction-stage impacts of the Project on the geomorphology, hydrology and quality of surface and groundwaters, including the high-sensitivity River Meon and connected groundwater bodies. The assessments conclude that mitigation measures WE1 – WE19 secured in the Outline CEMP – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1) will prevent significant adverse effects on these receptors and avoid deterioration in water body status. The following measures are of particular importance for the protection of surface and groundwaters at trenchless crossings: • WE1: The Contractor will adhere to the Environment Agency's Approach to Groundwater Protection (2018) framework.

Reference	Theme	Issue raised	The Applicant's response
			• WE14: A Drilling Fluid Management Plan will be developed by the Contractor to document how risks of any fluid breakouts will be reduced, managed and mitigated. • WE17: Trenchless construction works will use a methodology that excludes groundwater. The Outline CEMP – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1) secures pre-construction biodiversity surveys (TFB4 and TFB5), which will ensure any unexpected ecological features are identified. The Outline CEMP also requires the Contractor to prepare emergency procedures. Similarly, the Operational Environmental Management Plan [APP-422] includes an Emergency Response Plan and provides a framework to ensure environmental mitigation measures are implemented and maintained during operation, and that effective procedures are in place to manage routine activities and emergency scenarios.
RR-120-7	Terrestrial and freshwater biodiversity	Non-Statutory Designated Sites and Ecological Networks The Environmental Statement identifies 354 non-statutory designated sites, including Sites of Importance for Nature Conservation (SINCs) and Road Verges of Ecological Importance (RVEIs), within the Order Limits and surrounding area. Two SINCs would be directly affected: • Field to West of Gillman Road SINC. • Fielders Farm Meadows (Eastleigh) SINC. Fielders Farm Meadows is of particular concern given the acknowledged biodiversity importance of semi-natural grassland habitats in Hampshire and the increasing pressures on ecological networks from development and climate change. Hampshire & Isle of Wight Wildlife Trust considers that impacts on Local Wildlife Sites must not be dismissed simply because they lack statutory designation. These sites form critical components of Local Nature Recovery Networks and contribute significantly to biodiversity resilience. The applicant should therefore demonstrate that: • Impacts have been avoided wherever reasonably practicable; • Habitat losses are minimised; • Restoration will return affected sites to at least their baseline ecological condition; • Compensation is secured where full restoration cannot be guaranteed; and • Long-term habitat management and funding arrangements are legally secured.	The Applicant agrees with the Wildlife Trust that local wildlife sites such as these Sites of Importance for Nature Conservation (SINCs) are of importance regardless of their status as non-statutory designations. The design of the Project has prioritised avoidance of impacts to non-statutory designated sites where possible. Where this has been unavoidable, at Field to West of Gillman Road SINC and Fielders Farm Meadows (Eastleigh) SINC mitigation is secured via the Outline CEMP – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1) to ensure that appropriate restoration of these sites is achieved. Measure TFB24 in the Outline CEMP secures the portion of Fielders Farm Meadows (Eastleigh) SINC which is to be retained and protected during construction, additionally requiring the detailed design to seek to reduce the footprint of the construction compound L-5 to that which is reasonably required only. A bespoke habitat reinstatement plan will be produced for the SINC (details are included in the Outline LEMP (Document reference 7.5, DCO Volume 7, Version 1)) which will include removal of INNS, management of scrub encroachment and the use of the existing floral seed bank where possible, to ensure the SINC is left in a condition equivalent or better than its pre-impact state. The requirement for, and therefore funding of, long-term habitat management is legally secured via the Landscape and Ecology Management Plan (Document reference 7.5, DCO Volume 7, Version 1).

Reference	Theme	Issue raised	The Applicant's response
RR-120-8	Terrestrial and freshwater biodiversity	Biodiversity Net Gain and Nature Recovery Beyond mitigation of impacts, the Trust expects the project to contribute positively to nature recovery across Hampshire. We therefore encourage the Applicant to demonstrate how the scheme will: • Deliver meaningful biodiversity net gain beyond minimum regulatory requirements; • Contribute to Local Nature Recovery Strategy objectives; • Support recovery of chalk stream habitats; • Recovery of priority habitats and species; • Enhance ecological connectivity between designated and non-designated sites. • Deliver long-term habitat creation and management funded throughout the operational life of the project.	The Applicant recognises the Wildlife Trust's concern for the Project to contribute to Hampshire nature recovery. The Project will play a major role in making up the shortfall in water supply across the Applicant's Hampshire supply area, as part of long-term solutions to protect the unique chalk rivers in Hampshire, the River Test and River Itchen. As detailed in the Biodiversity Gain Plan [APP-426] and secured by Requirement 5 in Schedule 2 of the draft Development Consent Order [APP-023], the Applicant engaged with stakeholders across the county to identify potential opportunities for habitat enhancement and creation local to the Project. The Biodiversity Gain Plan explains how the Hampshire Nature Recovery Strategy has been considered in the proposals, for example, grassland enhancements at locations identified for measures in the LNRS. BNG Good Practice Principles have been considered and where off-site BNG provision is required, it will be prioritised within areas that are local to the Project (within one of the relevant local planning authority areas or landscape character areas within which the Project falls), where reasonably practicable to do so. The Project will result in at least a 10% net gain in biodiversity. Habitat creation, enhancement and management are proposed for the Project though Environmental Mitigation and Enhancement Areas (EMEAs), as detailed in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1). The maintenance and enhancement of habitat connectivity is a key consideration in the design of the ecological mitigation for the Project. Mitigation and monitoring measures are secured via the Outline CEMP – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1) and Outline LEMP (Document reference 7.5, DCO Volume 7, Version 1). As secured in the Outline LEMP (Document reference 7.5, DCO Volume 7, Version 1), habitat management within EMEAs will be undertaken from year six to the following time periods: 1. Within the EMEA that contains the WRP: a. Green roof and planting with a visual screening function will be managed for the lifetime of the Project. b. All other planting will be managed until established up to 15 years, to be defined in the detailed LEMPs. 2. Planting within EMEAs that contain the AGPs will be managed for lifetime of the Project. 3. Planting within EMEAs excluding the ones that contain the WRP and AGPs will be managed until established up to 15 years, the time frame will be dependent on the requirements of the planting and will be defined in the detailed LEMPs.

Reference	Theme	Issue raised	The Applicant's response
RR-120-9	Terrestrial and freshwater biodiversity	Conclusion Hampshire & Isle of Wight Wildlife Trust supports the need to secure sustainable water resources and acknowledges the potential environmental benefits arising from reduced abstraction pressures on Hampshire's internationally important chalk rivers. However, given the proximity of the proposal to a substantial number of internationally designated sites, SSSIs, Solent Brent Goose and wader sites, and locally designated wildlife habitats, the Trust maintains that a precautionary approach is required. At this stage, the Trust is not satisfied that all ecological risks and uncertainties associated with the Proposed Development have been fully resolved. The Trust therefore requests that the Examining Authority rigorously examines the evidence presented in relation to designated sites, functionally linked habitat, hydrological impacts, biodiversity enhancement measures and long-term ecological outcomes. Development consent should only be granted where the Applicant has demonstrated that the Proposed Development would: 1. Not adversely affect the integrity of any SAC, SPA or Ramsar site; 2. Not result in deterioration of SSSI condition; 3. Not lead to a net loss of biodiversity or ecological functionality; 4. Deliver legally secured mitigation, compensation and monitoring measures; and 5. Provide a genuine overall environmental benefit rather than transferring ecological impacts from one sensitive ecosystem to another. We therefore request that the Examining Authority gives careful consideration to the adequacy of the Habitats Regulations Assessment, ecological mitigation, compensation proposals, biodiversity enhancement measures, monitoring commitments and adaptive management mechanisms before consent is granted. Hampshire & Isle of Wight Wildlife Trust wishes to remain engaged throughout the examination process and reserves the right to provide further detailed comments on specific ecological matters within subsequent written representations and at relevant stages of the examination. Kind regards, (Redacted) Planning policy and Campaigns Officer Hampshire & Isle of Wight Wildlife Trust	The Applicant recognises the Wildlife Trust's concern that that all ecological risks and uncertainties associated with the Project are fully assessed. The Habitats Regulations Assessment Stage 2 - Appropriate Assessment and Marine Conservation Zone - Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2) provides the assessment for SAC, SPA, Ramsar sites and concludes no adverse effect on integrity. The ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) provides the impact assessment for SAC, SPA, Ramsar SSSI sites and concludes no residual significant adverse effects during construction or operation but does conclude a beneficial significant effect for the River Itchen SAC and SSSI due to the reduced abstraction from this watercourse. The Project will not result in a net loss of biodiversity or functionality. Mitigation and monitoring measures are set out in the Outline CEMP – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1) and Outline LEMP (Document reference 7.5, DCO Volume 7, Version 1), secured by Requirements in Schedule 2 to the Draft DCO [APP-023].

Table 2-21 The Applicant's response to RR-126 from Harvey Robert Hiscock

Reference	Theme	Issue raised	The Applicant's response
RR-126-1	Greeting	Our Ref: Water for Life - Relevant Representation / Objection (Letter 3, Rev. 3) 8 August 2026 To: The Planning Inspectorate (National Infrastructure) Temple Quay House, 2 The Square, Bristol BS1 6PN Application: Hampshire Water Transfer and Water Recycling Project PINS reference: HRH/CWH/1748 Made by: (Redacted), Director of Logistical Building Services Holdings Limited (the freehold owner) and operator of (Redacted) ('the Objector'). Dear Sir/Madam,	The Applicant notes this comment.
RR-126-2	Resources and waste management	1. PRINCIPAL OBJECTION - THE APPLICANT HAS NOT INVESTIGATED THE GROUND BENEATH THE ROUTE IT NOW PROPOSES I am a director of Logistical Building Services Holdings Limited, the freehold owner of Five Oaks Farm and I object to the proposed Order. I ask to be registered as an Interested Party. My principal objection is this: the Applicant has not carried out any ground investigation in the soft-sand area through which the pipeline is now routed, and it has therefore failed to identify, quantify or assess the sterilisation of the mineral resource that its own Order would destroy. The Applicant's ground investigation boreholes on my land were sunk only on the margin of the site, in the London Clay, where little or no workable soft sand is present. Since that investigation was carried out, the Applicant has moved the pipeline alignment into the soft-sand part of my land - and it has not sunk any boreholes in that new location. The consequence is that the very ground the pipeline now crosses has never been physically investigated by the Applicant. This omission runs right through the application documents. On my understanding: the Mineral Safeguarding Assessment (ES Appendix 16.1, document APP-183) and its borehole logs (ES Figure 16.3, document APP-377) do not reflect any investigation of the current soft-sand alignment; the borehole locations shown are on the clay margin, not on the route as now proposed; the Land Quality and Ground Conditions chapter (ES Chapter 11, document APP-090) and the geotechnical and geo-environmental reports behind it (ES Appendix 11.2, documents APP-164 to APP-168) rest on the same, mislocated, investigation; and the Resources and Waste Management chapter (ES Chapter 16, document APP-095), which reports the Applicant's conclusion on mineral effects, is	The Applicant understands that the landowner considers that the Ground Investigation (GI) does not represent the current pipeline alignment across Five Oaks Farm because no borehole was completed within the soft-sand area now crossed by the route. The landowner consequently considers that the ES does not provide an adequate baseline, identify or quantify the mineral resource affected, or properly assess the significance of its sterilisation. The landowner requests further site-specific GI and reassessment before the Project proceeds. The Applicant acknowledges that no GI borehole was completed at the precise location of the current pipeline alignment across the land referred to. The alignment was refined after the GI works. This limitation is outlined in paragraph 2.2.5 of ES Appendix 16.1 Mineral Safeguarding Assessment [APP-183], and paragraph 16.6.5 of ES Chapter 16 Resources and Waste Management [APP-095]. ES Figure 16.3 [APP-377] records the exploratory locations investigated and does not indicate that every part of the current alignment was subject to intrusive investigation. The absence of a borehole at the precise location of the current alignment does not mean that the potential mineral resource beneath that alignment was omitted from the assessment. The minerals baseline was established using the available GI results alongside geological mapping, publicly available British Geological Survey (BGS) information, the Geotechnical and Geo-Environmental Desk Study and baseline information from other ES topics. This approach is set out in paragraphs 16.5.23 to 16.5.26 and 16.5.38 to 16.5.41 in ES Appendix 16.1 Mineral Safeguarding Assessment [APP-183]. The assessment study area also extends 400m beyond the Order Limits to consider potential indirect sterilisation through fragmentation, as set out in paragraphs 16.5.13 and 16.5.14. Section J of the pipeline route is identified as being predominantly within a Soft Sand Mineral Safeguarding Area (MSA), with smaller areas within a Superficial Sand and Gravel MSA. Both resources were assigned medium sensitivity in ES Chapter 16 Resources and Waste Management [APP-095]. The

Reference	Theme	Issue raised	The Applicant's response
		therefore built on a baseline that does not describe the ground actually affected. The effect is serious. Under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, the Environmental Statement must assess the likely significant effects of the development as applied for, on an adequate baseline. Here the mineral resource that would be permanently sterilised has not been quantified, the significance of that sterilisation has not been properly judged, and the assessment does not describe the alignment now before the Examining Authority. I ask the Examining Authority to require the Applicant to carry out site-specific ground investigation (boreholes) along the current alignment across my land, and to re-assess the mineral sterilisation on that evidence, before the application is allowed to proceed.	assessment therefore proceeded on the basis that safeguarded minerals could be present beneath the current alignment. The Minerals and Waste Safeguarding in Hampshire Supplementary Planning Document recognises that Mineral Safeguarding Area and British Geological Survey mapping provide an indication of where mineral resources may be present, with exploratory investigation used to test their local extent. The Supplementary Planning Document also identifies systematic and random sampling approaches. It does not state that intrusive investigation must be undertaken at every point within a development area. Hampshire County Council, acting as Minerals and Waste Planning Authority, reviewed the GI reports forming ES Appendix 11.2 Geotechnical and geo-environmental reports ([APP-151] to [APP-155] for documents 1 to 5, [APP-157] for document 7, and [APP-161] to [APP-164] for documents 11 to 14 of 18 documents) (Document reference 6.2, DCO Volume 6, Version 1 for documents 6, 8 to 10 and 15 to 18 of 18 documents). Hampshire County Council (RR-121) concluded that, given the limited excavation footprint of the pipeline, the reports were sufficient to identify where potentially viable mineral resources are present. The assessment also considered the risk of sterilisation. Paragraphs 16.5.42 and 16.5.46 of ES Chapter 16 Resources and waste management [APP-095] explain how geological information, mineral safeguarding designations and existing constraints were used to identify areas where the Project could prevent future mineral extraction. Paragraph 16.6.6 adopts the precautionary assumption that mineral resources beneath the Order Limits would be sterilised for the duration of construction and operation. The assessment was not intended to define a commercially recoverable reserve or provide a detailed quantification of mineral resources. Further investigation could provide more detailed information on the thickness, composition, quality and potential workability of the deposit. However, this would not alter the assessment's existing assumption that a mineral resource may be present and could be sterilised. For Section J, ES Chapter 16 Resources and waste management [APP-095] concludes that the largely unconstrained parts of the MSA could be affected by sterilisation without mitigation. Following implementation of the proposed mitigation, the magnitude of impact and overall significance of effect are assessed as minor. Under paragraph 16.5.51, only moderate or major effects are considered significant in EIA terms. The assessed effect for Section J is therefore not significant. The Applicant therefore considers that the minerals baseline is sufficient to support the EIA, that the potential for mineral sterilisation has been appropriately assessed using a precautionary approach, and that the conclusions presented in ES Chapter 16 Resources and waste management [APP-095] is robust. The Applicant notes that the design at Five Oaks Farm was refined following engagement with the landowner and Hampshire County Council after the Spring 2025 Consultation. The draft Order Limits were widened to provide

Reference	Theme	Issue raised	The Applicant's response
			flexibility for the pipeline alignment to be refined at the detailed design stage, taking into account any future mineral extraction proposal. The Order Limits in this location were designed to reduce conflict between the Project and potential future mineral extraction at Five Oaks Farm. The design refinement was included in the targeted statutory consultation undertaken in Autumn 2025. The design refinement to the Order Limits at Five Oaks Farm aimed to reduce conflict between the Project and potential future mineral extraction of the land at Five Oaks Farm. The final location of the pipeline can be refined within the Order Limits post-consent following further engagement with the landowner as their mineral extraction proposal progresses. The Applicant remains committed to ongoing engagement with the landowner on this matter.
RR-126-3	Resources and waste management	I object on the following further grounds, developed below: the permanent sterilisation of a safeguarded mineral resource (sections 2-3); the Applicant's failure to adopt an obvious, lower-carbon, mutually beneficial solution I put to it - that it buy my mineral and deposit its spoil in my land (section 4); that the compulsory acquisition is not justified (section 5); inadequate consultation and engagement, following a rushed last-minute change of route through the reserve (section 6); unsound route and site constraints (section 7); and disproportionate impact and inadequate compensation on a working family farm (section 8).	The Applicant understands that the landowner objects to the Project on the basis of their concerns that it would permanently sterilise a safeguarded mineral resource at Five Oaks Farm. The Applicant acknowledges the landowner's concerns regarding the compulsory acquisition of rights and engagement in relation to the Project. The Applicant acknowledges the concerns raised. Five Oaks Farm was not an allocated or consented mineral extraction site when the assessment was undertaken and therefore is not defined as a mineral receptor in ES Chapter 16 Resources and Waste Management [APP-095]. The assessed receptor is the safeguarded mineral resources. ES Appendix 16.1 Mineral Safeguarding Assessment [APP-183] was undertaken to confirm the presence of mineral and the impact of the Project on sterilisation of the mineral receptors is assessed in section 16.8 of ES Chapter 16 Resources and Waste Management [APP-095]. For section J of the pipeline route, ES Chapter 16 Resources and waste management [APP-095] assesses the Soft Sand Mineral Safeguarding Area (MSA) as a medium sensitivity receptor and, following the implementation of tertiary mitigation, the results concluded a minor adverse effect that is not significant in EIA terms. The Applicant considered alternative corridors and alignments as a key part of the scheme development process. A corridor to the north-east was discounted because it would pass through Waltham Chase and result in greater effects on residential properties, community facilities, the highway network and the South Downs National Park. Routes to the south-west were discounted due to ancient woodland, established settlements, increased pipeline length, additional changes in direction and less favourable hydraulic performance. The preferred corridor therefore passes through Five Oaks Farm. Within this corridor, the Applicant compared the Best Engineering Solution Pipeline Route which is outlined in ES Chapter 4 Consideration of alternatives [APP-083] with an alternative alignment. The alternative was selected because it reduced the potential interface with protected species, increased the distance from the nearest residential property, avoided crossing Black Horse Lane and provided a straighter pipeline alignment. The selected route performed better

Reference	Theme	Issue raised	The Applicant's response
			overall when environmental, community, engineering and delivery considerations were taken into account. Following engagement with the landowner regarding potential future mineral extraction proposals, the Applicant widened the Order Limits at Five Oaks Farm. This provides flexibility to refine the final pipeline alignment during detailed design with a view to reducing conflict with future mineral extraction proposals that may be pursued at this location. The refinement was included in the targeted statutory consultation undertaken in Autumn 2025. The purpose of the Project is to deliver the Hampshire Water Transfer Scheme and not to facilitate or enable mineral extraction. Accordingly, the Application does not seek consent for mineral working beyond the limited excavation and handling of material that may be incidentally encountered during construction of the Project. The Applicant intends to continue engagement with the Landowner as the Project progresses. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with the respondent regarding a voluntary agreement. The Applicant is seeking a further meeting with the landowner to discuss their feedback and voluntary agreement further. In regard to compensation please refer to RR-126-12 response.
RR-126-4	Landowner engagement	2. MY LAND AND INTERESTS Five Oaks Farm extends to approximately 40 acres and includes hard-standing yards used for commercial storage and lorry parking, commercial office space, two domestic residences, barns and buildings used for agricultural, commercial and equestrian purposes, and further commercial units. The site supports established commercial and domestic lettings, an intensively used equestrian operation let year-round, and agricultural use. To date Southern Water have not communicated with any of the tenants or other interested parties who occupy Five Oaks Farm. Critically, my land contains a soft-sand mineral resource which is recognised by Hampshire County Council, as Mineral Planning Authority, on its minerals plan, and which is identified as of interest for mineral working. The resource on my land forms part of a wider mineral reserve that is also the subject of a mineral extraction application on Winchester City Council's planning portal. That reserve, agreed between the neighbouring landowners, extends beyond my own land across a larger area; I do not state a total area here, as that is not a matter presently before the councils. I have promoted this resource for extraction for approximately ten years, at considerable personal expense, together with my minerals partner, T J Waste & Recycling Limited. The proposed pipeline passes directly through this reserve.	The Applicant notes the comments regarding the land use. The Applicant refers to RR-126-5 regarding the mineral extraction comments. The Applicant has undertaken diligent inquiry to obtain the details of persons with an interest in the Order Limits, as summarised in the Consultation Report [APP-029] Section 9.3.17 to 9.3.30. As part of this process Land Interest Questionnaires (LIQs) were issued to the respondent ahead of the Summer 2024 Consultation to assist the respondent in identifying themselves, confirming contact details, and clarifying land ownership, occupation, tenancy arrangements, and any other interests in land, including rights of way and option agreements. The LIQs also sought to confirm that land ownership and occupation boundaries were correctly identified. The Applicant did not receive a response to these LIQs from the respondent despite reminder letters being sent. The Applicant then issued the respondent a Confirmation Schedule in October 2025, which summarised the Applicant's understanding of the respondent's interest in land relevant to the Project. The Applicant sought a response to confirm whether the information held was correct, however no response was provided despite a further reminder letter being issued in December 2025. Given the respondent has not responded to the Applicant's request for information on occupation of the land via the LIQ requests, the Applicant would welcome details of the tenants and occupiers so the Book of Reference

Reference	Theme	Issue raised	The Applicant's response
			(Document reference 4.3, DCO Volume 4, Version 1) can be updated accordingly with any necessary amendments. The Applicant most recently met with the respondent and their representative on site on the 13 October 2026 to discuss their land use and feedback further.
RR-126-5	Resources and waste management	3. STERILISATION OF A SAFEGUARDED MINERAL RESOURCE Minerals can only be worked where they are found. Once a pipeline and its protective easement are installed across the reserve, extraction beneath and adjacent to it becomes impossible or wholly uneconomic, and heavy plant cannot cross a live pipeline to reach sand on the far side. The effect of the Order is therefore the permanent sterilisation of a finite, locally scarce mineral resource. It is no answer that I do not yet hold planning permission to extract. Mineral safeguarding exists precisely to protect a resource from being needlessly sterilised by other development before any extraction application is made; the absence of an extraction consent is irrelevant to the safeguarding duty. National planning policy requires mineral resources to be safeguarded, recognises that they are finite and can only be worked where found, and requires that they are not needlessly sterilised, with prior extraction considered where practicable. Hampshire's own safeguarding policy has the same purpose. So far as I can establish, the Applicant has not demonstrated that it has assessed the sterilisation effect on the resource actually present, consulted Hampshire County Council as Mineral Planning Authority about that effect, considered facilitating prior extraction, or considered an alignment that avoids the safeguarded reserve. I ask the Examining Authority to require the Applicant to do so, and to re-align the route to avoid sterilisation or to enable prior extraction; failing which, to secure protective provisions and proper compensation for the mineral value lost.	The Applicant understands that the landowner considers that the Project would permanently sterilise a finite and locally scarce safeguarded mineral resource at Five Oaks Farm, including by preventing extraction beneath and adjacent to the pipeline and restricting access to minerals elsewhere on the land. The landowner also considers that the Applicant has not adequately assessed this effect, consulted Hampshire County Council as the Minerals and Waste Planning Authority, considered prior extraction, or considered an alternative alignment that avoids the safeguarded resource. The landowner requests that the route be realigned or prior extraction enabled, or otherwise that protective provisions and compensation for the mineral value affected are secured. The Applicant acknowledges that mineral resources are finite and that mineral safeguarding seeks to prevent their needless sterilisation. The receptors assessed in the ES are the Mineral Safeguarded Areas (MSA). The assessment considered Mineral Safeguarded Areas (MSAs) as the receptors for the purposes of the mineral resources assessment. Five Oaks Farm is located within the MSA and was therefore considered as part of the assessment of effects on safeguarded mineral resources. It was not assessed as a separate individual receptor as there is no existing consented or operational mineral extraction at this location. Five Oaks Farm is located within the MSA which was assigned a medium sensitivity within the methodology outlined in section 16.5, ES Chapter 16 Resources and waste management [APP-095]. The land in question is located within section J of the pipeline routing. See Applicants response to RR-126-3 for further details regarding the review of routing options considered. ES Chapter 16 Resources and waste management [APP-095] confirms that section J is predominantly located within a Soft Sand MSA and smaller sections located within a Superficial Sand and Gravel MSA. As outlined in the Applicant's response to RR 126-3 following the implementation of mitigation the significance of sterilisation across in Section J were found to be minor. The Applicant has assessed the possibility of the prior extraction of mineral resources along the proposed pipeline in section 8 of ES Appendix 16.1 Mineral Safeguarding Assessment [APP-183]. It was concluded that this is unviable. The Applicant will incorporate the principles of incidental extraction as part of the Project to minimise the impact of sterilisation of mineral resources along the proposed route where practicable. The Applicant engaged with Hampshire County Council (HCC) in its role as Minerals and Waste Planning Authority. The September 2025 Minerals, Waste and Resources Issues Log Review Meeting covered resource sterilisation, the Minerals Management Strategy, safeguarded sites and infrastructure, and the justification for incidental extraction rather than prior extraction. Resources and

Reference	Theme	Issue raised	The Applicant's response
			waste assessment, mitigation and monitoring were also addressed through the Emissions and Transport EIA Working Group, as recorded in Appendices A.6 and B.4 of the Statement of Engagement [APP-072]. HCC have submitted a Relevant Representation Response for the Project (See RR-121).
RR-126-6	Resources and waste management	4. THE MUTUALLY BENEFICIAL SOLUTION THE APPLICANT SHOULD ADOPT - PURCHASE OF THE MINERAL AND DEPOSIT OF SPOIL A pipeline of this kind requires imported sand to bed and surround the pipe, and it generates a large volume of excavated spoil that must be disposed of. There is an obvious and mutually beneficial solution, which I have put to the Applicant: that Southern Water purchase the bedding sand it needs from the very resource on the line of its works, and pay to deposit its surplus spoil within my land.	The Applicant notes the landowner's view on extraction and use of mineral resources within the Order Limits at this location. The Project is not seeking consent for mineral extraction activities beyond the limited excavation and handling of material that may be incidentally encountered during construction. As outlined in section 8 of ES Appendix 16.1 Mineral Safeguarding Assessment [APP-183]), opportunities for prior extraction of mineral resources were considered and concluded not to be a viable mitigation measure. The Applicant has committed to implementing incidental extraction, where practicable, in accordance with mitigation measure RWM13 as detailed within the resources and waste management mitigation measures set out in section 16.10 of ES Chapter 16 Resources and waste management [APP-095].
RR-126-7	Resources and waste management	This solution serves both parties and the wider public interest. For the Applicant, sourcing bedding material on the line of the route and depositing spoil locally - instead of importing sand and hauling spoil to distant disposal by road - would cut haulage carbon and cost, consistent with its own Outline Carbon Management Plan (document 7.8), Carbon and Climate Change chapter (ES Chapter 10, document APP-089) and Resources and Waste Management chapter (ES Chapter 16, document APP-095). For my part, it would realise the value of the resource without sterilisation and without the cost and delay of bringing forward a separate extraction scheme. It is difficult to reconcile the Applicant's carbon and resource-efficiency commitments with a scheme that instead sterilises an adjacent sand resource and a ready-made void on its own route. This solution has become the rational resolution because the Order itself now obstructs independent extraction. The matters raised on my earlier extraction application have since been resolved. However, since the Applicant diverted the pipeline through the reserve, I have been unable to secure a mineral operator willing to fund extraction independently: no operator will invest against the risk of a race to extract ahead of the Applicant's construction programme, and the potential exposure to claims by the Applicant should extraction be incomplete when its works begin. The Order therefore both sterilises the resource and blights my ability to realise it, unless the Applicant adopts the purchase-and-deposit solution.	The Applicant notes the landowner's view that extraction and use of mineral resources within the Order Limits could reduce the import of construction materials and the export of surplus material. With regard to the comments on carbon reduction, the Applicant acknowledges that the approach may have the potential to reduce carbon emissions. However, as the approach does not form part of the Project assessed within the Environmental Statement, its potential carbon effects have not been evaluated. Accordingly, no assessment has been undertaken of the potential carbon implications of the approach and it is therefore not possible to draw conclusions regarding the nature or extent of any associated carbon benefits. Opportunities of this nature may be considered further as part of future construction planning and delivery arrangements, where appropriate, but the project is not currently at a stage where such specific opportunities form part of the Project. As outlined in RR-126-3, the Project is not seeking consent for a mineral extraction activity beyond the limited excavation and handling of material that may be incidentally encountered during construction. As outlined in section 8 of ES Appendix 16.1 Mineral Safeguarding Assessment [APP-183], opportunities for prior extraction of mineral resources were considered and concluded not to be a viable mitigation measure. The Applicant has committed to implementing incidental extraction, where practicable, in accordance with mitigation measure RWM13 as detailed within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), [APP-413] and [APP-414] for documents 2 and 3. The Applicant considers that incidental extraction, where practicable, represents an appropriate and proportionate approach for the Project. The Applicant will continue to engage with the landowner as the Project progresses.

Reference	Theme	Issue raised	The Applicant's response
RR-126-8	Alternatives	The Applicant's failure to pursue this option is relevant both to the adequacy of the Consideration of Alternatives (ES Chapter 4, document APP-083) and the Scheme Development Report (document 5.10), and to whether there is truly a compelling case in the public interest to sterilise this resource when a lower-carbon, lower-cost, mutually beneficial option is available. I ask the Examining Authority to require the Applicant to assess and pursue it.	Please see response to RR-126-6 and RR-126-7. The Scheme Development Report [APP-073, APP-074, APP-075] and ES Chapter 4 Consideration of alternatives [APP-083] present the alternative options and designs considered by the Applicant in developing the Project. These documents do not consider the approach to mineral resources which is assessed in ES Chapter 16 Resources and waste management [APP-095] .
RR-126-9	Location of the proposed pipeline routes	5. THE COMPULSORY ACQUISITION IS NOT JUSTIFIED Under section 122 of the Planning Act 2008, compulsory acquisition may only be authorised where the land is required for the development and there is a compelling case in the public interest, with the land taken being no more than reasonably necessary, all reasonable alternatives explored, and the interference with my rights (including under Article 1 of the First Protocol and Article 8 ECHR) justified and proportionate. The Applicant has not met these tests in respect of my land: the Order limits and working corridor appear excessive and unjustified in scale; less harmful alternatives (including a route avoiding the reserve, trenchless techniques, and the on-route sourcing option in section 4) have not been shown to be properly considered; and the sterilised mineral value has not been weighed in the balance at all. The scale of the area take is disproportionate to what is needed to construct the pipeline.	In response to engagement with those with an interest in Five Oaks Farm and Hampshire County Council, the Applicant extended the Order Limits in this location to provide greater flexibility in the design of the Pipeline, so that the Applicant and the developer of Five Oaks Farm can continue engagement as the proposed minerals extraction proposal develops. The maximum working width for trenched open-cut construction of the Pipeline would be 40m, which is secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m for a maximum length of 42m. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project.
RR-126-10	Landowner engagement	6. INADEQUATE CONSULTATION AND ENGAGEMENT I wrote to Southern Water on 27 June 2024 and again in March 2025, and a meeting was subsequently held between the Applicant's consultant, Hampshire County Council, my minerals partner (T J Waste & Recycling Limited) and myself. At that meeting the Applicant undertook to explore either using the mineral resource or designing its works around the reserve. I then heard nothing further. The reason meaningful engagement was not possible is the Applicant's own doing. The pipeline was not originally routed through the mineral reserve; it was diverted through it at a late stage. That late change left no time for the proper procedures - including proper assessment of the resource and of alternatives, and proper negotiation - to be followed, and members of the Applicant's own team acknowledged that time was not on their side in making the change. A directly and severely affected landowner and a safeguarded mineral reserve were thus caught by a rushed, last-minute route change without the engagement or assessment the situation demanded. I ask the Examining Authority to establish whether my correspondence, the meeting,	The Applicant notes that as part of further engagement with the landowner and Hampshire County Council after the Spring 2025 Consultation, additional information regarding the aspirations for future minerals extraction at Five Oaks Farm was provided. The Applicant accordingly undertook further design refinements and widened the draft Order Limits at Five Oaks Farm to provide flexibility for the pipeline route alignment to be refined at the detailed design stage and take into consideration any future mineral extraction proposal. As detailed in the Consultation Report [APP-029], the Applicant consulted on this design refinement as part of the targeted statutory consultation undertaken in Autumn 2025. The Applicant confirms that the respondent's previous comments regarding amending the pipeline route have been considered. The Applicant wrote to the respondent to provide an individual response to the comments raised as part of the pre-application statutory consultation on 22nd December 2025. The Applicant has also provided responses to feedback raised by the landowner in the Consultation Report [APP-029] in Appendix F (Statutory Summer 2024

Reference	Theme	Issue raised	The Applicant's response
		and my purchase-and-deposit proposal are recorded in the Land and Rights Negotiations Tracker (document 4.4, APP-028); if they are not, that is further evidence of inadequate engagement with a severely affected landowner, which is a material consideration.	Consultation [APP-047]) and Appendix G (Statutory Spring 2025 Consultation [APP-050]). The Applicant most recently met with the respondent and their representative on site on the 13 October 2026 to discuss their feedback further.
RR-126-11	Land quality and ground conditions	7. UNSOUND ROUTE - SITE CONSTRAINTS We have a former landfill site which is affected by the proposed works. The landfill was filled in the late 1950s and 1960s by a previous owner. We have no knowledge of what is buried, but have anecdotal evidence that a lot of contaminated waste was dumped, asbestos, medical waste etc. The alignment crosses a former landfill (contamination risk - I have been advised not to break the soil and hold no record of the deposited material; open-cutting risks mobilising contamination) and a subterranean watercourse understood to carry significant volumes of water (flood risk if breached). I ask the Applicant to state how it has accounted for and will manage each crossing, and to give written assurance that it will be responsible for any pollution, hazard or flooding arising, and for restoring the topsoil I have spent years improving.	The Applicant notes the concerns of Mr Hiscock with regards to the installation of the pipelines between the Water Recycling Plant (WRP) site and Otterbourne Water Supply Works, specifically where it passes through Rossgarth landfill (located within Section J of the pipeline). Project specific ground investigations have been undertaken along the route of Section J, including within the footprint of Rossgarth landfill. As part of the ground investigation soil, soil leachate and groundwater samples were collected and sent for laboratory analysis. A summary of the results of the ground investigation within Section J, including the contaminants identified, is provided within paragraphs 11.7.167 – 11.7.174 and 11.7-215 – 11.7.219 of ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1) with further details provided within ES Appendix 11.2 Geotechnical and geo-environmental reports ([APP-157] for document 7 of 18 documents). Additional ground investigations were recommended within ES Appendix 11.2 Geotechnical and geo-environmental reports ([APP-157] for document 7 of 18 documents) for this section of the pipelines between the WRP site and Otterbourne Water Supply Works to further assess ground conditions where the open cut construction will be undertaken. The potential pathways for which contamination associated with Rossgarth landfill, the source, may migrate and impact upon land quality and ground conditions receptors are outlined in Table 11-46 (Section J) of ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1). Table 11-46 (Section J) also includes example mitigation measures to reduce the potential impacts associated with Rossgarth landfill. These measures include the development and adherence to risk assessments and method statements protective of human health, the environment and controlled waters (groundwater and surface waters) which are secured via the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). Good practice measures for the handling, stripping, storing and reinstatement of soil resources are indicated in the Outline Soil Resources Management Plan, which is provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and secured by Requirement 6 of Schedule 2 to the Draft DCO [APP-023]. The Applicant notes the comment from the respondent that a culverted watercourse intersects the Pipeline route at this location. This will be managed by the Contractor post consent, in line with the commitments set out in environmental measure WE4 of the Outline CEMP (Document reference 7.1,

Reference	Theme	Issue raised	The Applicant's response
			DCO Volume 7, Version 1 for document 1 of 3), this measure commits the Contractor to prepare a Construction Drainage Plan that will be used to manage the quality and quantity of construction stage drainage and ensure ongoing drainage of the surrounding land. The plan will be informed by surveys undertaken by a specialist drainage Contractor, which will locate land drains and other below-ground drainage features, create pre-construction drawings and develop a suitable methodology for the reinstatement of drainage systems impacted by pipeline installation. The Construction Drainage Plan will set out the stages required to restore the soil structure and drainage status to at least the same condition as recorded prior to commencement of the construction works. Details of Project wide primary and tertiary mitigation measures that are protective of land quality and ground conditions receptors are discussed within Section 11.4 of ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1). An assessment of potential impacts on land quality and ground conditions receptors as a result of construction activities along the route of pipelines between the Water Recycling Plant site and Otterbourne Water Supply Works, inclusive of Section J and Rossgarth landfill, is provided within paragraphs 11.8-176 – 11.8.187 of ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1).
RR-126-12	Landowner engagement	8. DISPROPORTIONATE IMPACT AND COMPENSATION The works would cross the centre of my land, disrupt established equestrian, letting and agricultural activities and their tenants, and cause loss of income during construction and through blight. Above all, the compensation so far indicated bears no relation to the value of the mineral resource the Order would sterilise. I must be candid about the imbalance I face. Although this land holds a valuable mineral asset, that value is locked in the ground: Five Oaks Farm is a working family farm from which we make our living, and we do not have liquid funds to match the Applicant. A specialist minerals valuation would cost in the region of £10,000, which we cannot afford, and the Applicant has declined to fund it. The Applicant has meanwhile undervalued the resource and has refused to take account of the substantial evidence already in the public domain on Winchester City Council's planning portal - including borehole data and technical assessments we have carried out at our own expense - on the basis that it has not been submitted under cover of a solicitor's letter. It cannot be right that a national-scale undertaker may disregard robust, publicly available evidence and require a family farm to fund expensive professional reports simply to be heard on the value of what is being taken from it. I reserve my position fully on compensation and will provide valuation evidence as I am able.	The Applicant notes these comments and confirms the Order Limits have been widened to provide flexibility for further refinement of the pipeline route at the detailed design stage and welcomes further engagement with respondent should plans for any mineral extraction progress. The Scheme Development Report [APP-073, APP-074, APP-075] and ES Chapter 4 [APP-083] present the alternative options and designs considered by the Applicant in developing the Project. Although the Applicant is willing to work with the respondent to coordinate proposal and reach a voluntary agreement, the Applicant wishes to highlight that the land is not subject to an existing planning application and a previous planning application (ref 20/01483/HCS) was refused permission for a similar proposal on the same site for the following reasons: • The proposal was likely to result in unacceptable adverse visual and amenity impacts to occupiers of nearby properties as well as wider amenity impacts associated with Heavy Goods Vehicle movements. • The proposal did not fully evidence mitigation or adaptation measures to minimise its impact on climate change. • The proposal did not demonstrate that the development can protect local amenity and can protect water quality and surface water drainage and cause no additional flood risk. • The proposal did not have a safe and suitable access to the highway network and did not include suitable mitigation measures to mitigate any significant adverse effects on highway safety.

Reference	Theme	Issue raised	The Applicant's response
			On this basis, there is no certainty the new development proposal would materialise. Nonetheless, as stated above, the Applicant confirms the Order Limits have been widened to provide flexibility for further refinement of the pipeline route at the detailed design stage and welcomes further engagement with respondent should plans for any mineral extraction progress. The Applicant has been reimbursing the respondent's professional land agent costs arising from consultation and survey access since commencement of the Project. The Applicant is not aware of any outstanding fees incurred by the respondent. Given the Applicant's position above regarding the current status of the land, and in the absence of any extant planning applications, the Applicant does not consider a minerals valuation to be appropriate at this stage. However, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-126-13	Landowner engagement	9. WHAT I ASK THE EXAMINING AUTHORITY TO DO Register me as an Interested Party. Require the Applicant to carry out site-specific ground investigation along the current alignment and to re-assess the mineral sterilisation on that evidence. Require the Applicant to re-align the route to avoid sterilising the safeguarded resource, or to enable prior extraction, or - as I urge - to adopt the purchase-and-deposit solution: buying the bedding sand it needs from my resource and paying to deposit its spoil in my land. Require the Applicant to consult Hampshire County Council as Mineral Planning Authority and to engage substantively with me and my minerals partner, T J Waste & Recycling Limited. Require the Applicant to meet the reasonable professional costs (including specialist minerals valuation) needed for me to participate on a fair footing, and to take proper account of the evidence already in the public domain on Winchester City Council's planning portal. Secure protective provisions and proper compensation, including for the sterilised mineral value, and require the Applicant to take responsibility for contamination and flood risk arising from the landfill and watercourse crossings. I would welcome the opportunity to expand on these points in written and oral submissions during the Examination. Yours faithfully, (Redacted) Director, Logistical Building Services Holdings Limited -	The Applicant notes these comments but confirms they are addressed to the Examining Authority.

Reference	Theme	Issue raised	The Applicant's response
		[Redacted]	

Table 2-22 The Applicant's response to RR-131 from Hayward Family on behalf of Hayward Family

Reference	Theme	Issue raised	The Applicant's response
RR-131-1	Landowner engagement	Our position This representation is submitted by Jonathan Sweeney, Mark Hayward and Justin Cole in respect of the Sweeney, Hayward and Cole family ownership interests in HP761033 at Titchfield Lane, Wickham. We do not object to the principle of the Project. Our objection is to the amount and position of the land and rights Southern Water wants from this holding and the effect on farming and the existing Catesby promoted development. The Land is subject to a pre-existing promotion agreement with Catesby Estates and Southern Water has known about the future development aspirations for some time. We therefore expect Southern Water to take and restrict only the land it genuinely needs, to explain why less intrusive alternatives will not work and to coordinate its design with the landowners and Catesby.	The Applicant notes this comment. The site for IPS-G (Work No. 5B) has been subject to an extensive site selection process, as set out in Sections 5.12 of the Scheme Development Report [APP-073]. The Applicant confirms that compulsory acquisition powers are sought across plot 14-011 in respect of all interests (including freehold) as shown edged black and shaded pink on the Land Plans (Document reference 2.2, DCO Volume 2, Version 2) in connection with Works No.5B shown on the Works Plans [AS-008]. The nature and extent of the works including the permanent change of land use from its current agricultural purpose, together with the Applicant's requirement to exercise ongoing control over the land and restrict access to authorised personnel, are incompatible with continued use by the current landowners. On this basis, the acquisition of the freehold is necessary, proportionate and justified. The Applicant confirms that compulsory acquisition powers are sought for rights and the creation of new rights (including imposing restrictive covenants) over plot 14-012 which is shown edged black and shaded blue on the Land Plans (Document reference 2.2, DCO Volume 2, Version 2) in connection with Works No.4 as being construction of a pipeline between the Water Recycling Plant and Otterbourne Water Supply Works. Finally, the Applicant confirms that temporary possession powers have been sought over plot 14-013 and 14-014 which is shown edged black and shaded yellow on the Land Plans (Document reference 2.2, DCO Volume 2, Version 2) in connection with Works No.6 as being the establishment of temporary construction compounds. Further details on the rights sought by the Applicant in respect of the land referred to by the respondent can be found within Schedule 5 to the Draft Development Consent Order [APP-023] and shown on Sheet 14 and Sheet 15 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2). The respondent can also find details on the types of works to be undertaken on Sheet 14 and Sheet 15 of the Works Plans [AS-008]. In accordance with the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition have been met. As detailed within the Statement of Reasons [APP-025], temporary use powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the

Reference	Theme	Issue raised	The Applicant's response
			minimum extent of land and rights required to operate and maintain the project thus mitigating the extent of the acquisition of land and rights. Although the Applicant is willing to work with the respondent to coordinate proposal and reach a voluntary agreement, the Applicant wishes to highlight that the land being promoted for residential development is not allocated in the local plan or subject to a planning application. On this basis, the Applicant considers it would not be reasonable for the design of the Project to be implicated when there is no certainty the development would materialise. It remains the Applicant's firm preference to reach a voluntary agreement for the acquisition of land and rights where possible and the Applicant is willing to discuss voluntary agreement requirements further with the respondent. The Applicant will continue to engage with the respondent's land agent regarding their feedback and comments on the Heads of Terms. The Applicant most recently attended a site meeting with the respondent and their representative on the 20 October 2026 to discuss these matters further and consider how future development aspirations can be coordinated.
RR-131-2	Landowner engagement	For the continuation of RR-131, please refer to references RR-061-2 to RR-061-105 in table 2-9.	For the continuation of RR-131, please refer to references RR-061-2 to RR-061-105 in table 2-9.

Table 2-23 The Applicant's response to RR-133 from Hee Kyoung Kang

Reference	Theme	Issue raised	The Applicant's response
RR-133-1	Principle of development	Of course, I am opposed to the idea of having a tunnel carrying wastewater under my house, as anyone would be. The whole idea is misguided.	The only pipelines that would transfer treated wastewater would be the Pipelines between Budds Farm WTW and the WRP site (Work No. 2). These Pipelines do not pass under any residential properties. The Pipelines between the WRP site and Bedhampton Springs (Work No. 3) would transfer highly purified recycled water. The Pipelines between the WRP site and Otterbourne WSW (Work No. 4) would transfer source water comprising water from Havant Thicket Reservoir and recycled water from the WRP.
RR-133-2	Alternatives	In an arid country with no rain this maybe an idea worth exploring. However the UK has so much rain that surely it must be a better idea to find a way to store more of the water when it rains to ensure that we have enough to carry us through the summer, even in times of drought.	New reservoirs have been considered through the Applicant's WRMP and options appraisal processes but have not been deemed as a reasonable alternative to the Project as these take a significant amount of time to develop, carry their own environmental impacts, and would need to rely on river abstractions (to fill them) that the Applicant is required to reduce. The Applicant is already investing significantly in Havant Thicket Reservoir and White Horse Reservoir to provide additional water supplies to its area, and Havant Thicket Reservoir plays a critical role in the Project by augmenting the volume of water that it can provide.

Reference	Theme	Issue raised	The Applicant's response
RR-133-3	Attitudes to water recycling	Who wants to drink treated waste water? Nobody that I have ever talked to. With the possibility that it may carry infectious bacteria should some of the treatment system break down, probably even less.	As described in ES Chapter 3 Description of the Proposed Development [APP-082], highly treated wastewater will undergo advanced multi-barrier treatment to produce purified recycled water before blending with spring water in Havant Thicket Reservoir. Source water from the reservoir will then be transferred for final treatment to drinking water standards at Otterbourne Water Supply Works (Otterbourne WSW), before going into supply and will continue to meet the strict water quality standards required by the Drinking Water Inspectorate (DWI), Regarding concerns related to the potential for malfunctions, the Water Recycling Plant (WRP) components and treatment process capability will be continually monitored, maintained and replaced throughout its lifecycle to ensure regulatory compliance and efficiency. The WRP will feature numerous safeguards so that deviations in water quality are quickly identified and rectified through partial or full system shutdowns, and in the unlikely event that the required standards are not met, water would be automatically diverted to run to waste. The Applicant remains committed to transparency, rigorous monitoring and full compliance with all relevant regulations throughout the development and operation of the Project.
RR-133-4	Alternatives	The whole concept must be re-thought in a manner that is appropriate for our country. Another reservoir, measures to prevent evaporation of reservoir water, fixing leaks etc etc.	The Project forms a key part of the Applicant's strategy for responding to future water resource needs in Hampshire. Please refer to the Applicant's response to RR-133-2 with regard to additional new reservoirs. Fixing leaks remains a key part of the solution to managing water demand and supply. The Applicant has an ambitious target to reduce leakage by up to 50% by 2050, but fixing leaks alone will not solve the water resource challenge in Hampshire, which is why a major new source of water is required (i.e. the Project) to help address the significant water supply shortfall. The Case for the Project [APP-057] sets out the compelling need for the Project.

Table 2-24 The Applicant's response to RR-135 from Henry S Russell

Reference	Theme	Issue raised	The Applicant's response
RR-135-1	Landowner engagement	Havant Pipeline Proposal; Comments by Henry Russell (landowner) relating to the proposed Hampshire Water Transfer and Water Recycling Project. My family and I farm 200 acres at Highbridge Farm approximately 2 miles south of Otterbourne. Our ownership includes over a kilometre of canal bed and over four kilometres of river frontage land. And it includes 40 acres of irrigated meadow as well as 80 acres of unirrigated meadow. I have worked on this asset full time for 54 years. I also rent cropping rights extending as far as Twyford church and have been tenant of land adjoining Southampton Airport	The Applicant notes this comment.

Reference	Theme	Issue raised	The Applicant's response
		since 1966. I work with the fishing clubs on the beats between Twyford and Southampton Airport. While not formally qualified, I am very experienced in Itchen Valley hydrology.	
RR-135-2	The draft DCO	I have received details of a D C O from Southern Water relating to a pipeline to deliver water from Havant to Otterbourne which I consider to be inept.	The Applicant notes the representation. The Applicant does not agree with the characterisation of the Project or the draft DCO. The Project has been developed through an extensive process of option appraisal, design development, environmental assessment and stakeholder consultation. The Applicant considers that the Application documents provide a clear and robust justification for the Project, including its design, environmental effects, land requirements and the powers sought within the draft DCO. The Applicant remains willing to engage with Interested Parties and to consider and respond to any specific comments or concerns regarding the Project, the draft DCO or any of the supporting documents during the Examination process.
RR-135-3	Alternatives	This project contains major infrastructure change at large capital cost when alternatives have not been examined or costed thoroughly. If costed, it could be demonstrated that supply sourced within the Itchen valley is far more effective.	One of the fundamental reasons the Project is needed is to reduce abstractions from rivers including the River Itchen which is an important and rare chalk stream habitat. The Applicant has considered reasonable alternatives to the Project through its WRMP and options appraisal processes. The options appraisal carried out in 2021 considered a range of alternative technologies and solutions, and assessed these against planning, environmental, socio economic and cost criteria, with water recycling and transfer selected as the preferred solution. The Applicant's emerging WRMP24 and Water Resources South East (WRSE) Regional Plan both select the Project as a key component of future water supply in the Hampshire area and wider South East. The water supply deficit facing Hampshire is such that the Project is required not only for drought resilience but also for providing essential daily water supplies in normal weather. Other options considered through both the WRMP and options appraisal processes do not provide the scale of new water resource needed and in the timescales required. The need for the Project and an explanation of the alternatives considered (including alternative technologies) is presented in the DCO submission in the Case for the Project [APP-057] and the Scheme Development Report [APP-073, APP-074, APP-075].
RR-135-4	Alternatives	Historically the Itchen flowed from Ropley to Southampton until around 1860 at which time the Itchen Navigation was formed as a canal with gated locks and, as the canal was elevated, irrigated meadows were installed adjoining it. Over the last hundred years the lock gates have been abandoned and the canal has acted as a secondary drain to the river. The volume passing through the abandoned lock at Allbrook clearly exceeds the proposed pipeline volumes multiple times. It would be far more cost effective for Southern Water to restore the canal and create more capacity in the Itchen Valley.	The volume of water that the Applicant can extract from the River Itchen is governed by abstraction licencing, as determined by the Environment Agency. The permitted volumes in the abstraction licence were reduced in 2018, and therefore the Project would contribute to meeting the resultant shortfall in water supplies as well as future anticipated abstraction reductions, particularly during times of drought. Abstracting more water from the Itchen would be contrary to the sustainability objectives of reducing abstractions from this sensitive environment.

Reference	Theme	Issue raised	The Applicant's response
RR-135-5	Location of the proposed pipelines	When installed the meadows worked to alleviate winter flooding and charge the aquifer in spring to maintain summer flows by creating more capacity. Mine is the only irrigated meadow at large scale that remains. The ability to store and use water in the Itchen existed 100 years ago but has been lost due to the dereliction of the canal structures and the adjoining meadows. The last activity from E A, around 55 years ago was to examine suitability for a reservoir at Highbridge. This was subsequently sited in the river Test valley. Southern Water proposes a 43 kilometre pipeline under several river valleys and over chalk escarpments.	Please refer to the Applicant's response to RR-135-4.
RR-135-6	Project finance and cost	The scale of the project precludes an accurate assessment of the challenges and costs.	The delivery of large and complex Strategic Resource Options such as this Project is managed through the RAPID gated process, which provides independent, multi-stage scrutiny and assurance by water industry regulators. This process ensures that all technical, environmental, and operational aspects are robustly assessed and that stakeholder feedback is considered at each stage before progressing to the next. To date, the Applicant has passed the requirements of each stage of the RAPID gated process, and the Project is now being considered through the consenting process, through which the benefits and impacts of the Project will be thoroughly assessed.
RR-135-7	Design of AGP	It will cause much disruption during and after construction. Intermediate pumping stations and break pressure tanks will cause permanent disruption to the present occupiers and activities.	The Applicant notes this comment. The locations of the Above Ground Plant (AGP) have been selected to minimise the construction impact while still meeting the essential technical requirements of the option. The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) sets out the site-specific principles of the AGP design, including considerations relating to noise, visual impacts and environmental mitigation. ES Chapter 12 Land use and agriculture [APP-091] considers the in-combination effects from construction, operation and decommissioning of the Project on residential amenity, taking into account the findings of other relevant environmental assessments, including air quality, noise, landscape and visual, and traffic and transport. The assessment concludes that construction of the pipeline in this area it is not anticipated to result in any significant in-combination effects on residential amenity, with at most a minor adverse effect.
RR-135-8	The Applicant's wider operations and Project interfaces	Within my land their works so far have included bore-hole investigation to a depth of 100 feet which could be preliminary works for abstraction points at the pumping stations which will lower the aquifer and change surface soils.	Borehole investigations have been undertaken to assess ground water and ground conditions in order to inform the project design. These are not preliminary works for abstraction points.
RR-135-9	The water recycling process	Also whilst there are plans to import water there are no plans for water waste treatment which is in poor condition handling current volumes.	The Applicant notes this comment. This Project will not add more strain on Budds Farm Wastewater Treatment Works (Budds Farm WTW). Instead, it will take a proportion of the highly treated wastewater from Budds Farm WTW, which is usually pumped out to sea, and process it into purified recycled water. The Project utilises Budds Farm WTW as this is one of the Applicant's largest wastewater treatment works and therefore has the greatest capacity for

Reference	Theme	Issue raised	The Applicant's response
			supplying the treated wastewater required for a Water Recycling Plant (WRP) producing approximately 60 megalitres per day (Ml/d) of recycled water. Upgrades to Budds Farm WTW are being progressed by the Applicant separately to the Project.
RR-135-10	Terrestrial and freshwater biodiversity	The plan appears to support importation from an acidic source to be processed and discharged into an alkaline valley. Substantial areas of the Itchen valley are sites of special scientific interest (SSSI) and or European SAC status. The site we own at Highbridge is one of only two small sites containing the rare Southern Damselfly. If both sites are extinguished the species will become extinct. The proposals include passing under the Itchen and Navigation as well as the main railway line within the SSSI.	The Applicant recognises the importance of the populations of southern damselfly on the River Itchen SSSI and SAC. Impacts of the Project on southern damselfly were assessed within ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1), including field surveys carried out on the River Itchen in 2024, and southern damselfly presence is assumed for the assessment. The Project will be tunnelled underneath the River Itchen at the Highbridge location and no open-cut water crossings are proposed here. Where open-cut crossings are proposed within the River Itchen catchment, habitat suitability assessments will be undertaken prior to construction to identify any risks to southern damselfly and other Section 41 and Annex II invertebrate species. This measure is secured within the Outline CEMP – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1) measure TFB14. An assessment of potential impacts on the River Itchen and its tributaries is provided in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) and ES Appendix 19.2 WER compliance assessment (Document reference 6.2, DCO Volume 6, Version 1). These assessments conclude that the construction and operation of the Project will not result in significant adverse effects or deterioration in the status of the River Itchen and associated water bodies. The Applicant does not propose to release recycled water directly into the River Itchen catchment, either during the commissioning stage at the end of construction or during the operation of the WRP and transfer pipeline to Otterbourne WSW. As stated in measure OEMP2 in the Operational Environmental Management Plan [APP-422], water used in testing and routine maintenance of washout valves and from pipeline drain down will be captured in a tanker and taken to a suitable off-site location for disposal. The Applicant reiterates that operation of the Project will reduce the requirements for water abstractions from the River Itchen SSSI and SAC, which result in a beneficial effect.
RR-135-11	Landowner engagement	Southern Water contractors have already entered my land under assumed statutory powers. They have caused disruption to my graziers and paid minimal compensation. Their plan proposes purchases far in excess of the pipeline needs and under threat of compulsory purchase offered 20% of the sale valuation.	**Survey Access and Compensation** Surveys have been undertaken to inform the Environmental Impact Assessment and design development of the project. Where possible, access for surveys was sought through voluntary agreements with landowners. In circumstances where survey access could not be secured voluntarily, the Applicant exercised statutory powers available for taking access to private land for undertaking surveys. The Applicant considers that all survey activities have been undertaken in accordance with the relevant legal powers and procedures. Where losses have arisen as a result of survey activities, affected

Reference	Theme	Issue raised	The Applicant's response
			parties have been able to submit claims for compensation. The Applicant remains willing to review any outstanding compensation concerns with the respondent. **Impacts on Grazing and Agricultural Operations** The Applicant acknowledges concerns regarding disruption to grazing activities and farming operations. The Project has sought, where reasonably practicable, to minimise impacts on existing land uses through route refinement, construction planning and reinstatement commitments as detailed in the Scheme Development Report [APP-073, APP-074, APP-075], the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and the Outline Soil Resource Management Plan at Appendix B therein. The Applicant recognises that temporary impacts may occur during construction and confirms that compensation for losses and disturbance would be assessed in accordance with the compensation code where rights are acquired or temporary access taken. **Extent of Land and Rights Sought** The Applicant does not agree that land is being sought in excess of what is reasonably required for the construction, operation, maintenance and protection of the Project. The extent of the Order Limits, temporary working areas, construction compounds and permanent rights has been developed following engineering, environmental, operational and safety assessments. The Applicant considers that the land and rights sought are necessary to facilitate delivery of the Project and to ensure it can be safely constructed, operated, maintained and accessed throughout its operational life. The Applicant considers that the tests in section 122 of the Planning Act 2008 are met. As set out in the Statement of Reasons [APP-025], the land and rights sought are required for, facilitate, or are incidental to the construction, operation, maintenance and protection of the Project. The Applicant has sought to minimise interference with private interests by limiting the powers sought to those reasonably necessary and, where appropriate, acquiring rights rather than freehold interests. The extent of the Order Land has been refined through the development process and alternatives have been considered. **Voluntary Agreements and Commercial Offers** The Applicant remains committed to seeking voluntary agreements wherever possible and continues to engage constructively with landowners and their professional representatives. The commercial terms offered through Heads of Terms have been subject to review and amendment throughout the negotiation process, including discussions through the Land Agent Group and directly with affected parties. Should voluntary agreement not be reached, any compensation payable for the acquisition of land or rights would be assessed in accordance with the statutory compensation code. The Applicant remains willing to continue discussions with the respondent including discussions on the commercial

Reference	Theme	Issue raised	The Applicant's response
			terms to understand their concerns and seek to resolve outstanding issues where possible.
RR-135-12	The Applicant's wider operations and Project interfaces	Portsmouth Water has been obliged to resolve foul water problems at Gosport by building a transfer pipe and reservoir at Havant. If the outflow is connected to Otterbourne, Southern Water could become responsible for the destruction of an internationally recognised and protected area of special Ecological importance. H S Russell 27/7/2026	Havant Thicket Reservoir is not being delivered to resolve foul water issues at Gosport. As outlined in Portsmouth Water's Water Resources Management Plan 2024, the Project would introduce purified recycled water to the reservoir for blending with spring water. Portsmouth Water customers would only receive blended reservoir water in a drought or emergency under this option, although Portsmouth Water may require blended reservoir water for its own use from 2046–47. Portsmouth Water would remain responsible for meeting its statutory and regulatory obligations to its customers. The representation's reference to an "outflow" connected to Otterbourne does not accurately describe how the Project would operate. Treated wastewater from Budds Farm would undergo a robust, multi-barrier treatment process at the Water Recycling Plant to produce purified recycled water. This water would be transferred to Havant Thicket Reservoir, blended with spring water and then conveyed to Otterbourne Water Supply Works for final treatment before entering the Applicant's public supply system, as described in ES Chapter 3 Description of the Proposed Development [APP-082]. Detailed modelling of Havant Thicket Reservoir and downstream receiving waters demonstrates that, with the proposed treatment and operational controls, the Project would not cause deterioration in water quality in the reservoir or downstream water bodies, as reported in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) , ES Appendix 19.6 Havant Thicket Reservoir Compensatory Flows water quality modelling [APP-201] and ES Appendix 19.11 Havant Thicket Reservoir water quality modelling [APP-206]. ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) considers the corresponding effects on aquatic ecological receptors and concludes that, with mitigation, there would be no significant residual effects. The Project would therefore not result in significant adverse effects on internationally designated ecological sites. .

Table 2-25 The Applicant's response to RR-137 from Ian Judd and Partners on behalf of Hilary Wyer

Reference	Theme	Issue raised	The Applicant's response
RR-137-1	Greeting	Please see the supporting information sent by email. 1. Key Information Name of Interest party: [REDACTED] Address: Ivy Cottage, Stroudwood Lane, Lower Upham, Southampton SO32 1HG	The Applicant notes this comment.

Reference	Theme	Issue raised	The Applicant's response
		Email Address: [REDACTED] @aol.com Telephone Number: [REDACTED]	
RR-137-2	Landowner engagement	Name & Address of Property Affected: Land at Winchester Road, Lower Upham. Land Plan Reference No: 21-018 7,918m2 0.79ha 1.95 acres - Temporary Rights 21-019 23,260m2 2.32ha 5.75 acres - Acquisition of Rights 21-020 17,489 m2 1.75ha 4.41 acres - Temporary Rights Total 48,667m2 4.87ha 12.03 acres - Temporary Rights Linear length of pipe: 327m (Approx) Use of Land: Pasture- Grazing and hay Interest Parties on my land: Land Agent Instructed: Ian Judd and Partners, 4 High Street, Bishops Waltham, Southampton, Hampshire, SO32 1AB 01489 896422 [REDACTED]@ianjuddandpartners.co.uk	The Applicant notes this comment.
RR-137-3	Principle of development	2. Summary of Submission 2.1. I wish to become an interested party and submit my strongest objection to this Development Consent Order Application. 2.2. The volume of land take is unjustified, unnecessary and disproportionate.	The Applicant notes this comment. The Order Limits provide flexibility for refinement at the detailed design stage following approval of the DCO application. As the detailed design develops, the land requirements for the construction and operation of the Project are expected to be reduced to the minimum area reasonably required for its safe construction and operation. From an engineering perspective, the land requirements along the pipeline corridor are driven by the need to safely construct, operate and maintain the infrastructure. This includes provision for pipeline installation, excavation, haul roads, temporary access, segregation and storage of topsoil and subsoil, construction plant, environmental mitigation, and reinstatement activities. The standard maximum working width for open-cut pipeline construction is 40m, with reduced widths applied where appropriate. In constrained locations, temporary widening may be required over limited lengths to facilitate the safe storage of excavated materials and construction activities. The Draft Order Limits also provide for limits of deviation, temporary works, environmental mitigation and enhancement measures, access requirements and flexibility necessary to accommodate detailed design development and delivery of the scheme following consent. The Project has been assessed on a Rochdale Envelope basis to ensure environmental effects have been assessed against a robust worst-case scenario whilst retaining appropriate design flexibility. The justification for compulsory acquisition powers, easement requirements, Order Limits and land interests sought is set out within the DCO application

Reference	Theme	Issue raised	The Applicant's response
			documentation and should be considered in the context of the overall land and planning case for the Project.
RR-137-4	Land use and agriculture	3. Summary of Land Use 3.1. I own approximately 24.5acres (9.9ha) of land at Winchester Road, Lower Upham. The land is used for permanent grassland, used for hay production and grazing of sheep and horses. 3.2. Southern Water propose to occupy 12.03 acres of my land, approximately half of my holding. The intend to sever the land leaving 5.8 acres at the north and 6 acres at the south.	The Applicant notes the landowner's comments regarding the extent of land required temporarily during construction. In this location, the Project proposes a temporary construction compound alongside construction of the Pipeline as shown on Sheet 21 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2 for document 3 of 3) and Sheet 21 of the Works Plans - 3 of 3 documents [AS-008]. Following the completion of construction, the land would be reinstated to its existing condition. Details of construction activities and temporary land requirements are provided in Environmental Statement (ES) Chapter 3 Description of the Proposed Development [APP-082], and reinstatement measures are set out in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), [APP-413] and [APP-414] for documents 2 and 3 . The Environmental Statement Chapter 12 Land use and agriculture [APP-091] recognises that agricultural land would be temporarily required during construction, during which time land within the Order Limits would be taken out of agricultural production and use. Following installation and completion of construction, the land would be restored to its pre-existing agricultural use, as set out in the Outline Soil Resource Management Plan (SRMP) appended to the Outline CEMP. Commitments secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), [APP-413] and [APP-414] for documents 2 and 3) include maintaining access for landowners and occupiers, providing additional access points where reasonably practicable to mitigate field severance and relocating troughs, standpipes or field supplies where grazing land is severed.
RR-137-5	Landowner engagement	4. Southern Waters Conduct to date 4.1. We have been disappointed in Southern Waters conduct to date. They, via their agents have been rude, incompetent, and threatening at every encounter. They wouldn't take on board landowners advice, when we said the land was too wet for vehicle access and then got stuck in the mud. They have undertaken many surveys, however regularly didn't inform the us they were coming. 4.2. We took part in the public consultation in 2024 & 2025, yet our concerns have never been taken seriously and have never been addressed. The public consultations was just a formality that Southern Water gave lip-service to. 4.3. They have been most aggressive, constantly threatening court and legal action, if we do not allow access for surveys. They have entered any form of negation to allow surveys on our terms.	The Applicant does not recognise the accusations levelled at its approach to landowners. The Applicant confirms that consultation responses were received from the respondent at both the 2024 and 2025 consultation events. The Applicant wrote to the respondent on 9 December 2025 with a response to this feedback addressing the points raised by the respondent. Within this correspondence, the Applicant confirmed that changes had been made to the compound alignment based on the feedback provided. Further information can also be found within the Consultation Report [APP-029]. During discussions with landowners, the Applicant has acted responsibly in making landowners aware of the statutory alternatives available, should voluntary agreements not be reached. In relation to surveys, the use of statutory powers under Section 172 of the Housing and Planning Act 2016 has been referenced to ensure the respondent is aware of the statutory powers

Reference	Theme	Issue raised	The Applicant's response
		4.4. This is not what we would expect from a competent acquiring authority. We would expect them to value our knowledge of the land and work with, (not against) landowners to deliver this infrastructure.	available but confirmed that these would only be relied upon following reasonable attempts to secure access by voluntary agreement. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with the respondent regarding a voluntary agreement. The Applicant's engagement has invited the respondent to provide information about their land but to date, no information has been shared.
RR-137-6	Landowner engagement	5. Need for Compulsory Purchase Powers 5.1. The Department for Communities and Local Government, Planning Act 2008, Guidance related to Procedures for the compulsory acquisition of land (CA Guidance), sets out the requirements Acquiring Authorities should meet to be granted CPO powers. 5.2. Para 6. "provides that a development consent order may only authorise compulsory acquisition if the Secretary of State is satisfied that: - the land is required for the development to which the consent relates, or is required to facilitate, or is incidental to, the development,". 5.3. Para 8. "The applicant will also need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate"	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-137-7	Landowner engagement	5.4. Para 9. "The applicant must have a clear idea of how they intend to use the land which it is proposed to acquire. 5.5. Para 11. Section 122 of the Planning Act sets out two conditions which must be met to the satisfaction of the Secretary of State before compulsory acquisition can be authorised. The first of these is related to the purpose for which compulsory acquisition is sought. These three purposes are set out in section 122(2): (i) the land is required for the development to which the development consent relates for this to be met, the applicant should be able to demonstrate to the satisfaction of the Secretary of State that the land in question is needed for the development for which consent is sought. The Secretary of State will need to be satisfied that the land to be acquired is no more than is reasonably required for the purposes of the development. (ii) the land is required to facilitate or is incidental to the proposed development. An example might be the acquisition of land for the purposes of landscaping the	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent and in accordance with the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition have been met. The Applicant's proposed use of the land is set out in the Works Plans [APP-014] with detail of each Works Number set out in 'Schedule 1 – Authorised Development' to the Draft Development Consent Order [APP-023]. The respondent is affected by 'Works No.4 – Pipeline between the WRP site and Otterbourne WSW' and 'Works No.6 – Construction Compounds' for which the Applicant is seeking the acquisition of rights and temporary possession powers as set out on Sheet 21 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2). The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained

Reference	Theme	Issue raised	The Applicant's response
		project. In such a case the Secretary of State will need to be satisfied that the development could only be landscaped to a satisfactory standard if the land in question were to be compulsorily acquired, and that the land to be taken is no more than is reasonably necessary for that purpose, and that is proportionate.	until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-137-8	Location of the proposed pipeline routes	5.6. We believe that part the land included within the order limits is not necessary to facilitate the scheme and it volume of land taken is not proportionate. 5.7. On our property the order limits extending to 12.03 acres for 327 linear meters of pipe, which equates to an average of 149m in width, with a maximum width of around 298m. This cannot be justified as reasonably necessary or proportionate.	This land is required for a temporary sectional site compound, which would support construction works from Winters Hill to Fisher's Pond. The location for the construction compound has been selected considering its proximity to Winchester Road (B2177) and the Pipeline. The Order Limits in this location represent land required to support construction in the wider area, not just lay the Pipeline in this specific location, which is explains why the Order Limits extend as described. The working width has been determined considering the size of the pipeline, the trench and the space needed to store and separate material so it can be reinstated properly. Additionally, sufficient space to accommodate construction vehicles and plant is required. The maximum working width for trenched open-cut construction of the Pipeline would be 40m (secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. When intersecting sensitive constraints such as vegetation and roads, a reduced working width (RWW) of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a RWW is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m for a maximum length of 42m. Further information, including a cross section of the 40m construction working width, is provided section 3.5 of ES Chapter 3 Description of the Proposed Development [APP-082]. As per preliminary Design Principle PDP_1 (see the Design Approach Document – 1 of 3 documents [APP-077]), the Applicant has taken the approach to minimise land take, whilst ensuring sufficient space and access for efficient construction and operation, through route and site selection and optimising site layouts. The Statement of Reasons [APP-025] sets out the case for why the Applicant is justified in seeking compulsory acquisition powers where these are required.
RR-137-9	Location of the proposed pipeline routes	5.8. The Acquiring Authority have not provided any justification for the scale/quantum of the Order Limits.	The design of the Project as set out in the DCO application provides flexibility for refinement informed by further surveys and investigations at the detailed design stage. The detailed design will be developed following approval of the DCO application and the appointment of a Contractor. This approach ensures

Reference	Theme	Issue raised	The Applicant's response
		5.9. We understand that Southern Water have chosen to save cost and not to undertake detailed design and want an element of "flexibility". This flexibility could be reduced to 20m in width. It is clear that the scale of the Order Limits significantly more than is reasonably necessary or proportionate for a pipe that 0.8m in width. 5.10. The inclusion of 6.36 acres of temporary work area is disproportionate. There is no justification for the compound (see below) 5.11. There is nothing within their submission that provides an justification for this excessive width of the order Limits.	efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs. If the pipeline working width were to be reduced in this location as suggested, the Order Limits would not be reduced as a construction compound would still be required. The construction compound would comprise office buildings for up to approximately 20 construction employees, welfare facilities, parking spaces for approximately 50 vehicles, and storage areas. Sectional site compounds would be used as staging sites for construction workers to arrive from the construction workers hub and travel to other temporary construction compounds and working areas along the haul road. In accordance with the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition have been met. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits, whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) sets out the maximum diameter of the pipelines for the different Project components, which may be greater than the 800mm referenced by the Respondent. The Applicant considers the permanent rights sought are justified in order to protect and preserve the integrity of the Project.
RR-137-10	Location of the proposed pipeline routes	6. Scale of the Working Area 6.1. The justification for the working width is lacking any reality, below is an exact Graphic 3-3 Para 3.5.92 document Reference 6.1.	As set out above, given this land is proposed for a temporary construction compound, reducing the working width for Pipeline construction would not have a significant effect on the land take, due to the residual requirement for a construction compound. The working width has been determined considering the size of the pipeline, the trench and the space needed to store and separate material so it can be reinstated properly. Additionally, sufficient space to accommodate construction vehicles and plant is required. The maximum working width for trenched open-cut construction of the Pipeline would be 40m (secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. When intersecting sensitive constraints such as vegetation and roads, a reduced working width (RWW) of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a RWW is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened

Reference	Theme	Issue raised	The Applicant's response
			up to 50m for a maximum length of 42m. Further information, including a cross section of the 40m construction working width, is provided section 3.5 of ES Chapter 3 Description of the Proposed Development [APP-082]. As per preliminary Design Principle PDP_1 (see the Design Approach Document – 1 of 3 documents [APP-077]), the Applicant has taken the approach to minimise land take, whilst ensuring sufficient space and access for efficient construction and operation, through route and site selection and optimising site layouts. The Statement of Reasons [APP-025] (sets out the case for why the Applicant is justified in seeking compulsory acquisition powers where these are required.
RR-137-11	Location of the proposed pipeline routes	6.2. They have stated (Para 3.3.3 Document Reference 4.1) that the maximum working width is 40m. Yet later (para 3.3.1 Document Reference 4.1- please note numbering error in document) the working width may be up to 50m.	As per the Applicant's response to RR-137-10, given this land is proposed for a temporary construction compound, reducing the working width for Pipeline construction would not have a significant effect on the land take, due to the residual requirement for a construction compound.
RR-137-12	Construction impacts and effects	6.3. This has a "Working Area and Haul Road" of 11m and a pipe trench 4m wide. This is excessive, yet only totals 15m in width. They want a further 25m for topsoil and subsoil storage. Completely disproportionate.	As per the Applicant's response to RR-137-10, given this land is proposed for a temporary construction compound, reducing the working width for Pipeline construction would not have a significant effect on the land take, due to the residual requirement for a construction compound.
RR-137-13	Location of the proposed pipeline routes	6.4. I have undertaken a simple calculation of what may be needed as a working width - The Haul Road may be 3m wide, with occasional passing places, - Working area 8m, this allows 6m of digger working area, plus 2m pipe storage - Pipe width - this will be 1.5m plus say 1.5m each side of pipe = 4.5m - Topsoil Storage - A fair estimate is assume 150mm of top soil, across 20m equates to 3m3 of top soil, stacked at 1:2, say 2.5m x 1.25m = 3.75m3, therefore 2.5m for topsoil storage. - Sub-soil Storage - If the trench is 4 wide and assume a depth of 2m (2.15m below ground level) deep 7.5m3 of subsoil, again assume 1:2 stack equates to 4m of subsoil storage. - Excess 2m excess for fencing and other uses - Total working area required - 24m in width	As per the Applicant's response to RR-137-10, given this land is proposed for a temporary construction compound, reducing the working width for Pipeline construction would not have a significant effect on the land take, due to the residual requirement for a construction compound. The maximum working width for trenched open-cut construction of the Pipeline would be 40m, which is secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide the necessary space for a haul road, construction working areas, material storage areas, pipeline trench and soil storage areas. This is set out at section 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m, over a distance of a maximum of 42m. The haul road/working area must be a sufficient width to allow a suitably sized excavator to track back at 90 degrees to the pipe to lift it and then lower into the trench. A suitably sized excavator capable of carrying out a tandem lift of a string of pipes would circa 11m long hence the 11m required.

Reference	Theme	Issue raised	The Applicant's response
			The working area for the trench excavation is calculated using the width of the excavator capable of pipeline installation (circa 3.5m) and a 2m deviation of the pipeline route in each direction without compromising the pipelaying process. If the pipeline has to change direction the joints are designed to allow a slight angle deviation to alter the direction this is a gradual process and requires sufficient space to allow for it. Therefore, a total of 7.5m. The pipe storage/jointing area must be wide enough to allow the pipes to be welded together to form the strings before lowering into the trench. As there will be welders working on this while the excavator is operating a 1m safety exclusion zone has to be in place. The total of the pipe storage/jointing area is therefore a total of 3.5m The area required for topsoil storage is based on topsoil being 200mm thick, which equates to 8m3 for a 40m working width. With a side slope of 1:1 and maximum height of 1.8m an area of 7m has been allocated which includes for any bulking factor. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The area required for subsoil provides enough width in this area to segregate upper and lower subsoils, therefore there would be two separate mounds, which ensures the subsoil can be reinstated properly. A 1:1 side slope and a bulking factor has been incorporated which equates to 7m. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The above areas equate to a working width of 40m.
RR-137-14	Location of the proposed pipeline routes	6.5. It is completely unjustified, unreasonably, unnecessary for the purpose, and disproportionate to permit a working area greater than 24m in width for open cut sections of pipe. We ask the Secretary of State to restrict the working area to no more than 24m in width.	Please refer to the Applicant's response to RR-137-10 and RR-137-13.
RR-137-15	Landowner engagement	6.6. If Southern Water wish to used additional space this can be done by agreement at a market rent with individual landowners.	The Applicant has been seeking voluntary agreements for all land identified for temporary possession. Details of this engagement can be found within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1). As detailed within the Statement of Reasons [APP-025], temporary use possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the project. Whilst the Applicant's preference is to reach a voluntary agreement, it considers that the temporary possession powers sought within the DCO are necessary to ensure that the Project can be delivered where agreement cannot be reached. Reasonable losses incurred by landowners arising out of

Reference	Theme	Issue raised	The Applicant's response
			the temporary use of land will be reimbursed in line with the Compensation Code. The Applicant therefore considers that the temporary possession powers sought are justified and proportionate, whilst maintaining that a voluntary agreement remains its preferred outcome where possible.
RR-137-16	Location of the proposed pipeline routes	7. Scale of Easement Width 7.1. We haven't been provided any justification of the easement width restriction. At present they can take permanent rights on 5.75 acres. This is unjustified and unnecessary and the Secretary of state should reduce this to a significantly smaller easement strip. 7.2. Southern Water (outside the DCO) requested a 11m easement for open cut and 5m for tunnels sections. There has been any engineering justification for the width of these restrictions.	The purpose of the easement is to protect the integrity and operational requirements of the pipeline and to ensure appropriate access for inspection, maintenance, repair and replacement activities. The required width has been determined following a detailed technical assessment, taking account of the pipeline's diameter, depth, construction methodology, location and operational function. For sections of pipeline installed using open-cut construction, the Applicant is seeking an easement width of 11m (5.5m either side of the pipeline). This reflects the access and operational requirements associated with maintaining and, if necessary, excavating the pipeline in the future. Notably, this represents a reduction from the Applicant's published stand-off guidance for water mains of a comparable size and depth [1], which would typically require a wider protected corridor. This reduction from the normal requirement has been communicated to landowners and their agents where this is being challenged. For sections constructed using trenchless techniques, a reduced easement width is considered appropriate, taking into account depth, construction methodology and location. As the pipeline is installed at greater depth and future maintenance or operational access would be undertaken from either side of the trenchless section rather than directly above it, the same level of restriction is not required. The easement width has therefore been tailored to reflect the differing operational requirements of the construction methodologies. The Applicant is therefore satisfied that the easement widths proposed represent the minimum reasonably required to protect the pipeline and secure its safe operation over its lifetime.
RR-137-17	Location of the proposed pipeline routes	7.3. We have assessed other water providers easement width and the typical easement width for an 800mm pipe is 8m total width. 7.4. We have requested justification for this easement width; this hasn't been supplied. We therefore believe this is unreasonable, unjustified and disproportionate and should be reduced.	Please refer to the Applicant's response to RR-137-16.
RR-137-18	Construction compound locations	8. Scale of Compounds 8.1. The scale of the Site Compound is unreasonable, Currently 2.54ha is set aside for a compound- with 1.78ha north and 0.79ha south. Why can the compound not be located in one place, leaving a larger area of land unaffected.	The construction compound would comprise office buildings for up to approximately 20 construction employees, welfare facilities, parking spaces for approximately 50 vehicles, and storage areas.

Reference	Theme	Issue raised	The Applicant's response
		8.2. Document reference 6.1 identifies that 2ha is needed for a site compound, this is vast space (2.8 football pitches) and with no justification why this vast is needed. It will have a significant visual impact adjacent to a busy A-road.	The construction compound would be split into two sections to avoid the removal of the hedgerow and trees that separate the north field from the south field. The likely landscape and visual effects associated with construction compound L-1 are assessed within ES Chapter 13 Landscape and visual [APP-092]. Relevant receptors include Local Landscape Character Area LLCA 34: Fair Oak Wooded Farmland and people associated with VP090 on Winchester Road, with detailed assessments presented in ES Appendix 13.3 Landscape baseline and effects [APP-173] and ES Appendix 13.4 Visual baseline and effects [APP-174]. The assessment identifies significant landscape and visual effects during construction associated with the temporary presence of the construction compound and associated construction activities. Construction compound L-1 is a temporary facility and would be removed following completion of the works. The land would be reinstated in accordance with the Outline Landscape and Ecology Management Plan (Document reference 7.5, DCO Volume 7, Version 1). Following reinstatement, no permanent above-ground Project infrastructure would remain at this location. As a result, operational landscape and visual effects associated with construction compound L-1 would not be significant.
RR-137-19	Construction compound locations	8.3. There is no justification why Southern Water cannot occupy a commercial yard, adjacent to major road network (M3 or M27) and store all of their equipment and pipes until they are needed on site. Only very small compounds can be justified. 8.4. Graphic 3-11 in document reference 6.1, demonstrates a vast 2ha compound. There is no justification for a compound of this scale.	If part of the required construction storage were to be located off-site, this would significantly increase the duration of construction works and the number of construction vehicle movements on the highway network. Both of these factors would result in adverse impacts on the environment and local communities. As per preliminary design principle PDP_1 (see the Design Approach Document – 1 of 3 documents [APP-077]), the Applicant has taken the approach to minimise land take, whilst ensuring sufficient space and access for efficient construction and operation, through route and site selection and optimising site layouts. The Scheme Development Report - 1 of 3 documents [APP-073], section 5.10, sets out the process undertaken to identify and assess compound locations, including the consideration of topography, ground conditions, and existing land uses. The suitability of each compound site has been reviewed in consultation with technical specialists, and mitigation measures will be incorporated where necessary to ensure safe and stable construction. Further, Construction of the Project will be managed by an Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3), which sets out the measures that will be implemented to avoid and reduce environmental impacts, including to vegetation.

Reference	Theme	Issue raised	The Applicant's response
RR-137-20	Construction compound locations	8.5. There is no need to have 40m x 100m of pipe storage at each compound. If the pipes were stacked 4 high, assuming each pipe is 8m in lengths with 100mm between pipes. This would be enough room to stack 2000 lengths of pipe or 16km of pipe per compound. If this is the case only 3 compounds are needed on the scheme. 8.6. The pipes should be stored off-site and can be brought from the main compound when they are needed	Within the construction compound, pipes would be stored in a way that allows for efficient and safe access. Other material will also need to be stored in the construction compounds. Detail on the construction compounds is outlined in ES Chapter 3 Description of the Proposed Development [APP-082] under section 3.5.129 onwards. Graphic 3-11 highlights the amount of storage necessary for pipelines which shows 5No. 14m x 26m storage areas for both pipelines and fittings. Whilst this indicative plan represents a typical construction compound, individual compound construction and design will be refined further in later design stages for discrete construction locations. If part of the required construction storage were to be located off-site, this would significantly increase the duration of construction works and the number of construction vehicle movements on the highway network. Both of these factors would result in adverse impacts on the environment and local communities. As per preliminary design principle PDP_1 (see the Design Approach Document 1 of 3 documents [APP-077]), the Applicant has taken the approach to minimise land take, whilst ensuring sufficient space and access for efficient construction and operation, through route and site selection and optimising site layouts. The Scheme Development Report - 1 of 3 documents [APP-073], section 5.10, sets out the process undertaken to identify and assess compound locations, including the consideration of topography, ground conditions, and existing land uses. The suitability of each compound site has been reviewed in consultation with technical specialists, and mitigation measures will be incorporated where necessary to ensure safe and stable construction. Further, Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3), which sets out the measures that will be implemented to avoid and reduce environmental impacts, including to vegetation.
RR-137-21	Traffic and transport	8.7. 50 car parking spaces at each compound is unnecessary additional traffic, all working should congregate at central point adjacent to major transport hubs (Eastleigh train station or M27) and then be mini-bused to site. Whilst 10 parking spaces may be necessary. This should be outside the area that is taken by compulsory purchase.	Whilst a typical construction compound would include parking for up to 50 vehicles, as detailed in the Framework Construction Traffic Management Plan (CTMP) [APP-415], many of the construction compounds will have minimal or reduced car parking. For these construction compounds, most contractors would be required to park offsite at either the Water Recycling Plant (WRP) site, Otterbourne Water Treatment Works (WTW) or the Construction Worker Hub. The Contractor would provide shuttle bus services between these sites and the construction compounds, significantly reducing the traffic impacts associated with construction worker travel. Construction compound L-1 does not have any parking restriction given it has safe and direct access to the local highway (B2177) and the construction traffic impacts in this location where not deemed to be significant in Environmental Impact Assessment (EIA) terms, as detailed in the Environmental Statement (ES) Chapter 18 Traffic and transport [APP-097].

Reference	Theme	Issue raised	The Applicant's response
RR-137-22	Landowner engagement	8.8. Even in graphic 3-11, more than 50% of the compound is not being used. The compounds should be limited to what is necessary for the scheme. We believe the compound should be reduced to a maximum of 20m x20m and a commercial rent should be paid. 8.9. It is unnecessary and disproportionate to use compulsory powers to acquire storage compound. Items can be stored in commercial storage space. We accept that smaller works compounds may be need, but believe that statutory powers should not be granted for commercial storage of this scale	Graphic 3-11 in ES Chapter 3 Description of the Proposed Development [APP-082] provides an indicative plan of a typical sectional site compound. The sectional site compounds would provide space for construction vehicles to turn and access the road network and haul road safely and efficiently, which would be undertaken in the open space remaining in the compound.If part of the required construction storage were to be located off-site, this would significantly increase the duration of construction works and the number of construction vehicle movements on the highway network. Both of these factors would result in adverse impacts on the environment and local communities. The detailed design of the Project, including those for the compound requirements, will be developed following grant of consent and subject to approval by the relevant authorities. Prior to undertaking detailed design as a post-consent activity, it is not possible to confirm the precise area of land required or the duration of temporary possession. This is consistent with the Rochdale Envelope approach where flexibility is required to address uncertainty that exists prior to the Project being consented. The Applicant is committed to keeping landowners informed as the design evolves and will provide clarity on land use requirements as soon as practicable.The Applicant has provided detail in ES Chapter 3 Description of the Proposed Development [APP-082] regarding the compound requirements and, as evidenced in the Statement of Reasons [APP-025], the Applicant considers that the land required for the Project has been justified.The Applicant has identified construction compounds along the pipeline route to facilitate direct access to the working area. This also reduces traffic impacts on the local road network and brings efficiencies with construction.Whilst the Applicant's preference is to reach a voluntary agreement, it considers that the temporary possession powers sought within the DCO are necessary to ensure that the Project can be delivered where agreement cannot be reached. The Applicant therefore considers that the temporary possession powers sought are justified and proportionate, whilst maintaining that a voluntary agreement remains its preferred outcome where possible. The Applicant confirms that where land is occupied temporarily by the Project, landowners may be entitled to submit claims setting out their reasonable losses in line with the Compensation Code.
RR-137-23	Landowner engagement	9. Private Negotiations and Alternative to Compulsory Purchase 9.1. We understand that it is not for the planning Inspectorate to comment on the terms of any private negotiated agreements. We must comment that Southern Water have been impossible to work with. They have dictated terms, without given any consideration to amending the terms. The terms offered a significantly worse that those under compulsory acquisition.	Since the commencement of negotiations of Heads of Terms, the Applicant has made several amendments to the proposed Heads of Terms as confirmed by a relevant representation made by a member of the Land Agent Group [RR-233] and improved the commercial offer during the negotiations to demonstrate this preference. In reference to the commercial terms offered, the Applicant does not consider the offer to put the respondent in a worse position than under compulsory acquisition. The Applicant formally requested evidence from the respondent's land agent on 28 January 2026 substantiating this claim. The Applicant is yet to receive a substantive response from the land agent.

Reference	Theme	Issue raised	The Applicant's response
RR-137-24	Landowner engagement	9.2. They are only playing lip-service and have no intention of reaching any form of settlement with Landowners and Occupiers. This is apparent from the Preapplication Land and Rights Negotiation Tracker. (Document 4.4) only 1 landowner has returned Heads of Terms out of 172 Category 1 Landowners. The one that has been return is a middle section of a drill section, so no above ground access is needed.	Whilst the Applicant would prefer to be able to advise the Examining Authority of a higher return of signed Heads of Terms, it does not consider this to be because the terms offered to the respondent are unreasonable. To date, despite formally requesting evidence demonstrating why the commercial offer is considered unreasonable on 28 January 2026, the Applicant is yet to receive a response. The Heads of Terms proposed by the Applicant closely align with those adopted across other utilities and infrastructure projects, which have also been reviewed and accepted by respective land agent groups. The Applicant refutes the respondent's comments on the approach taken to the negotiation of voluntary agreements. As detailed within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken extensive attempts to meaningfully engage with landowners on voluntary agreements and has continued to have productive discussions with them either directly or through their professional representatives.
RR-137-25	Landowner engagement	9.3. 99.4% of impacted landowners have refused to sign the Heads of Terms offered, clearly demonstrates that Southern Water have not made any significant effort to reach agreement with Landowners and Interested Partys and they are relying on taking land by compulsion.	The Applicant refers to its response to RR-137-24 above. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with landowners and their professional advisors regarding a voluntary agreement. The Applicant refutes the suggestion that it seeks to rely on statutory powers and confirms its preference to reach a voluntary agreement. The Applicant has made several amendments to the proposed Heads of Terms as confirmed by a relevant representation made by a member of the Land Agent Group [RR-233] and improved the commercial offer during the negotiations to demonstrate this preference.
RR-137-26	Landowner engagement	9.4. Not a single Option Agreements have been entered into.	Whilst the Applicant would prefer to be able to advise the Examining Authority of a higher return of signed Heads of Terms and progress to Option Agreements, it does not consider this to be because the terms offered to landowners are unreasonable. To date, despite formally requesting evidence demonstrating why the commercial offer is considered unreasonable on 28 January 2026, the Applicant is yet to receive a response. The Heads of Terms proposed by the Applicant closely align with those adopted across other utilities and infrastructure projects, which have also been reviewed and accepted by respective land agent groups
RR-137-27	Landowner engagement	9.5. I believe it is disingenuous to categorize me as "Head of Terms negotiation ongoing" (yellow status). This is not true, Southern Water have shown no interest in reaching an agreement with us. I request that my status is	The status recorded for the respondent by the Applicant in the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), does not indicate that voluntary agreement is agreed. Heads of Terms for a voluntary agreement have been issued and continue to be discussed with the

Reference	Theme	Issue raised	The Applicant's response
		amended to 'Heads of Terms agreements unlikely before close of examination". 9.6. Southern Water were unwilling to enter private agreements for surveys, instead service statutory notice, as it was deemed cheaper than trying to work with landowners. This is not the actions of a responsible acquiring authority.	respondent's representative. Following the Heads of Terms being issued on 6 March 2026 the respondent's representative wrote to the Applicant confirming that the respondent rejected the terms and did not wish to have a meeting. Subsequently, the Applicant discussed the Heads of Terms with the respondent's representative at a meeting on 13 May 2026. Following this, the Applicant requested a further meeting on 17 July 2026 and, after issuing a letter proposing revised Heads of Terms on 7 August 2026 incorporating amended provisions and improved commercial terms, sought an additional meeting with the respondent's agent on 11 September 2026, evidencing the Applicant's attempts to reach a voluntary agreement. In relation to surveys, the use of statutory powers under Section 172 of the Housing and Planning Act 2016 has been referenced to ensure the respondent is aware of the statutory powers available, however the Applicant confirms that these powers have only been relied upon following unsuccessful attempts to secure access by voluntary agreement.
RR-137-28	Land use and agriculture	10. Land Quality and Water Logging 10.1. Our soils comprise of Windsor Soil Type, seasonally wet deep clay, described as Slowly permeable seasonally waterlogged clayey soils with impeded drainage.	The Applicant notes the landowner's comments regarding the characteristics of local soils and potential waterlogging. Environmental Statement (ES) Appendix 12.1 Agricultural Land Quality [APP-169] identifies the Windsor soil association, comprising slowly permeable clayey soils with impeded drainage, as one of the most prevalent soil types within the Order Limits. Measures for the handling, storage and reinstatement of soils are set out within the Outline Soil Resources Management Plan (SRMP) contained in Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3).
RR-137-29	Construction impacts and effects	10.2. Our land can become very wet during the Winter. The soils are clayey, with impeded drainage. We wouldn't take a tractor onto our land between November and March, as it will cause damage soil structure. This was evidence when Southern Water Borehole surveys got stuck in the mud and caused deep ruts. In wetter periods there is often standing water on the land for weeks at a time.	The Applicant notes the landowner's comments regarding the characteristics of local soils and drainage issues. As per the Applicant's response to RR-137-28, ES Appendix 12.1 Agricultural land quality [APP-169] identifies the Windsor soil association, comprising slowly permeable clayey soils with impeded drainage, as one of the most prevalent soil types within the Order Limits. Measures for the handling, storage and reinstatement of soils are set out within the Outline Soil Resource Management Plan (SRMP) contained in Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3).
RR-137-30	Water environment	10.3. We believe it will be impossible to work on the land for 4 to 5 months of the year, particularly when the top soil has been stripped and the subsoils compacted with heavy machinery. There is insufficient information within the applicant's submission as how they are going to deal with this issue. How they are going to stop soil erosion and water and sediment runoff to the local streams and ditches.	The Applicant acknowledges the Respondent's comments regarding the potential for limitations on construction activities during wetter periods. The Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) sets out measures that will be implemented to manage drainage, prevent erosion of exposed soils and limit the supply of fine sediment to the surface drainage network during construction, including: • WE4: A Construction Drainage Plan will be prepared by the Contractor to manage the quality and quantity of construction stage drainage.

Reference	Theme	Issue raised	The Applicant's response
			• WE5: The Construction Drainage Plan will incorporate measures to reduce/remove the risk of sediment entrainment.
RR-137-31	Construction compound locations	10.4. This is completely the wrong place for a site compound. It will be flooded for more than 6 months of the year. How are they going to deal with surface water flooding on this land.	The location for the construction compound is considered to be suitable because of its close proximity to Winchester Road (B2177) and the Pipeline, ensuring ease of access for construction vehicles. The Flood Map for Planning identifies the proposed construction compound as being located within Flood Zone 1, indicating a low probability of flooding from rivers and the sea. However, the site is shown to be within an area at high risk of surface water flooding. As a result, the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) sets out measures that will be implemented to manage the risk of surface water flooding.
RR-137-32	Landscape and visual	11. Oak trees 11.1. We have some beautiful oak trees on our land, both in the field and in the hedgerows. We want to ensure these trees are protected. We have concerns about the heavy machinery in close proximity to the trees.	The Applicant notes this comment. These oak trees would be impacted/ removed by the construction compound in the worst case scenario assessment, however the Applicant is committed to retain existing tree features including root protection areas (RPAs) where reasonably practicable, with trees and hedgerows taken into consideration in the design process, and there will be no loss or deterioration of ancient and veteran trees, such as the veteran oak T688 in the northwest boundary. The design of the construction compound has considered potential impacts to trees. Reduced working widths would be used when crossing the lines of trees at the south, centre and west of the Respondent's land. This means that the working areas would be reduced to 20m to limit vegetation loss, and this is secured in the Outline CEMP [APP-412 to APP-414 - 3 documents].

Table 2-26 The Applicant's response to RR-138 from Himanshu Patel

Reference	Theme	Issue raised	The Applicant's response
RR-138-1	Alternatives	Hi I think there are better way to recycle water than using waste water for drinking	The Project is designed to address a critical water supply shortfall in Hampshire helping to protect sensitive chalk stream habitats, particularly during drought. The principle of water recycling is well established and recognised in national policy, widely used around the world and supported by the Environment Agency. The benefits of water recycling are recognised in the National Policy Statement for Water Resources Infrastructure (paragraphs 2.6.15 – 2.6.16). Currently, the Applicant's Budds Farm Wastewater Treatment Works releases an average of 1,500 litres a second of highly treated wastewater 5.7km out to. The Project will ensure this precious resource is not wasted, but effectively reused to make up for the significant volumes of water that the Applicant will no longer able to take from the environment that it is required to protect. The Project has been identified through the Applicant's WRMP and options appraisal processes as a crucial part of its strategy to respond to current and

			future water supply challenges. Other solutions have been extensively considered but are not available at the scale needed and in the timescales required. The need for the Project and an explanation of the alternatives considered (including alternative technologies) is presented in the DCO submission in the Case for the Project (Document reference 5.6, DCO Volume 5, Version 1) and the Scheme Development Report [APP-073, APP-074, APP-075].
RR-138-2	Project finance and cost	Cost of treatment to make to drinking standards will be vary high and you guys will pass on that bills to households	Costs are likely to be high for any large-scale solution for producing a new source of water, particularly when compared to costs of current unsustainable abstractions from the environment. As with all of the Applicant's costs, funding for new infrastructure would be averaged across water supply customers' bills and would be subject to approval by the water industry regulator, Ofwat. Ofwat exists to protect the consumer and ensure water companies deliver value for money by controlling costs that water companies can charge customers.
RR-138-3	Project finance and cost	So in nutshell you are looking for easy route and eventually increasing prices	There is no 'easy option' for delivering the scale of new water resource required to tackle the supply deficit facing the Hampshire area, and the Project is part of a suite of demand and supply measures needed to make up the shortfall. Costs are likely to be high for any large-scale solution for producing a new source of water, particularly when compared to costs of current unsustainable abstractions from the environment. The Applicant acknowledges that water supply customer's bills will need to increase to pay for the investment needed to secure a resilient water supply for the Hampshire area. This will be the case for many water supply customers across England, and particularly the South East, in order to fund the significant investment needed to tackle the increasing water supply shortages.

Table 2-27 The Applicant's response to RR-142 from Howard Smith

Reference	Theme	Issue raised	The Applicant's response
RR-142-1	Consultation	I have been talking to Southern Water about this project for a good few years. Here is a brief outline of my objections.	The Applicant notes this comment and confirms that extensive engagement has been undertaken with the respondent. The Applicant most recently met with the respondent on site on the 8 September 2026 to discuss their feedback further.
RR-142-2	Noise and vibration	The pipeline is shown to go under my house when I asked Southern water about noise during construction, and when completed they said I should not here it, but they are not sure!! My house is 6m underground so noise will carry. Also the pumping station is very close and S.Water don't know how noisy this will be !!. Will there be any vibration during construction and pumping. They will be using this site as a main construction hub/site so this be very noisy and dirty.	The construction and operational phase noise and vibration impacts of the Project have been assessed, as reported in Environmental Statement (ES) Chapter 15 Noise and vibration [APP-094]. With reference to the Construction noise and vibration assessment, set out in ES Appendix 15.1 Construction noise and vibration assessment [APP-179], this dwelling is represented in the assessment by (R20) and will be mainly affected by construction noise associated with the Above Ground Plant (AGP) - Mechanical and electrical installation works at Intermediate Pumping Station E (IPS-E), albeit impacts would not be significant.

Reference	Theme	Issue raised	The Applicant's response
			As a minimum all construction noise impacts/effects would be mitigated through the implementation of Best Practicable Means (BPM) with additional noise and vibration mitigation measures where required. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) provides potential mitigation options, the final package of noise mitigation will be identified in a Noise and Vibration Management Plan (NVMP) to be submitted to the relevant local planning authority for approval prior to commencement of construction. The likely operational noise effects of IPS-E (based on worst case assumptions) are assessed in ES Chapter 15 Noise and vibration [APP-094]. Table 15-38 therein shows that the operational noise impact would be major without secondary mitigation. With secondary mitigation, noise levels would be reduced and the mitigation secured in the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) includes that the Contractor will be required to design the Water Recycling Plant (WRP) site, AGP and Invasive Non-Native Species (INNS) Treatment at Otterbourne Water Supply Works (WSW) to ensure that operational noise levels at noise and vibration sensitive receptors (NVSRs, i.e. dwellings) and residual operational noise effects at all NVSRs are no worse than minor i.e. not significant. Based on the above, construction and operational phase noise levels will be controlled such that noise levels would result in no worse than minor impacts, as determined with reference to appropriate British Standards. Consequently, no significant construction or operational noise effects would result. With regards to construction vibration, the Section D tunnel reception shaft is located within the temporary construction compound E-1, which is to the north of Portsdown Hill Road and will be approximately 60m below ground level, i.e. the pipe would be running at a level of 54m below the lower level of this dwelling. As noted in Table 4-5 of ES Appendix 15.1 Construction noise and vibration assessment [APP-179] moderate impacts (and potentially significant vibration effects) would not be expected at distances greater than 6.7 m from tunnelling activity (a 'peak particle velocity' (PPV) of >15 mm/s). However as noted in paragraph 4.2.15 *"These values are considered highly cautious, TRL Report 429 states that "in soft ground, this is likely to be excessively conservative and the constant term could reasonably be reduced by an order of magnitude."* With reference to the Transport Research Laboratory (TLR) Report 429 noted (TLR, Report 429 Groundborne Vibration Caused by Mechanised Construction Works, Wokingham: TRL, 2000), highest vibration levels at 10m from a full-face 'Tunnel Boring Machine' (TBM) are <2mm/s, which correlates to a PPV level of <5mm/s at a distance of 5m, an impact of negligible magnitude, unlikely to result in any damage. Notwithstanding this, as per the current Outline CEMP APP-412(Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) *"The Contractor will prepare a Noise and Vibration Management Plan (NVMP) which will form part of, or be appended to, the detailed CEMP(s)".* Environmental measure NV1 identifies the proposed

Reference	Theme	Issue raised	The Applicant's response
			content of the NVMP, NV2 identifies the standard mitigation measures which will be included in each NVMP and NV3 identifies a range of additional mitigation measures that could be included where required to reduce exceedances of the Lowest Observed Adverse Effect Level (LOAEL) and avoid likely significant adverse effects where relevant and practicable. In summary vibration levels are unlikely to result in any damage but monitoring will be undertaken to confirm. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) also states that: *"A noise and vibration monitoring protocol including a schedule of noise and vibration monitoring locations and stages during construction of the Project when monitoring will be undertaken. To include physical and observational checks/audits at locations to be determined in consultation with relevant local planning authorities. Locations selected shall be determined by the works being undertaken (and level of anticipated noise) and the sensitivity of receptor and will be informed by further calculations once detailed design and construction planning is complete"* As reported in ES Chapter 15 Noise and vibration [APP-094] the pipeline and pumping systems will be designed and maintained in accordance with recognised industry good practice and relevant water industry standards. This includes undertaking hydraulic assessment to confirm appropriate pipeline performance, balancing pump rotors and incorporating heavy inertia bases and flexible connectors on pumps where required. This standard design process will ensure that the pipeline operates as intended and that noise from water flow within the underground pipeline is not expected to be audible. It will also ensure that vibration from the pumping systems will not be perceptible at NVSRs. Notwithstanding this, a 'Site Specific Design Principle' (SSDP) for work site Break Pressure Tank (BPT)/IPS-E is provided in the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1), stating: *"Detailed design will ensure that operational noise levels at noise sensitive receptors do not exceed the Lowest Observed Adverse Effect Level, as identified in ES Chapter 15 Noise and vibration. Mitigation measures will be adopted according to the following mitigation hierarchy..."* This SSDP provide a level of surety that the noise from operation of the Project will not adversely affect residential property or cause a loss of amenity. Consequently, no significant construction or operational vibration impacts/effects would result.
RR-142-3	Landowner engagement	As the pipe goes under my house there must be a wayleave agreement i.e. they pay me to run in my land and they indemnify me and any new owner against any problem that may occur (to include problems with noise, insurance, mortgage, property value). Will I be able to sale my house.	The Applicant confirms that the respondent owns land within the Order Limits for the Project. However, the detailed design, including aspects such as the final pipeline alignment, will not be available until the principal contractor has been appointed by Applicant following determination of the DCO. Therefore, the Applicant advises that the pipeline may not be installed under the respondent's property.

Reference	Theme	Issue raised	The Applicant's response
			As outlined in the Statement of Reasons [APP-025], the Applicant intends to exercise the powers of compulsory acquisition instead of entering into an individual easement with the respondent. This approach ensures that landowners are not required to enter into option agreements or deal with any administrative burdens in respect of their residential properties until the exact route of the pipeline is known. The Applicant wrote to the respondent on 18 May 2026 confirming this approach and the associated recognition payment that would be payable. The Applicant most recently met with the respondent on site on the 8 September 2026 to discuss their feedback further. The Applicant confirms that compensation will be paid for any reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-142-4	Noise and vibration	Any damage to my house or land during construction and during the pipelines life time must be indemnified by Southern Water or their future owners of the pipeline. 3 RICS surveyors say there must be daily surveys of my house due construction and startup of pumping and yearly check for noise and vibration.	As noted above, no significant construction or operational noise or vibration impacts/effects are anticipated at this property. Notwithstanding the above, as per the current Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) *"The Contractor will prepare a Noise and Vibration Management Plan (NVMP) which will form part of, or be appended to, the detailed CEMP(s)".* The NVMP will include details of mitigation measures that will be implemented to avoid likely significant adverse effects, based on the on the final construction methods, programme and Project design. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) also states that: *"A noise and vibration monitoring protocol including a schedule of noise and vibration monitoring locations and stages during construction of the Project when monitoring will be undertaken. To include physical and observational checks/audits at locations to be determined in consultation with relevant local planning authorities. Locations selected shall be determined by the works being undertaken (and level of anticipated noise) and the sensitivity of receptor and will be informed by further calculations once detailed design and construction planning is complete"* With regard to operational noise, as noted in the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1), SSDPs for BPT/IPS-E relevant to noise state: *"Detailed design will ensure that operational noise levels at noise sensitive receptors do not exceed the Lowest Observed Adverse Effect Level, as identified in ES Chapter 15 Noise and vibration. Mitigation measures will be adopted according to the following mitigation hierarchy:* • *Avoidance of noise and vibration* • *Control of noise and vibration at source*

Reference	Theme	Issue raised	The Applicant's response
			• *Implement good practice environmental noise management measures* • *Mitigate the propagation pathway, for example by introducing boundary screening"* In addition, and as reported in ES Chapter 15 Noise and vibration [APP-094] the pipeline and pumping systems will be designed and maintained in accordance with recognised industry good practice and relevant water industry standards. This includes undertaking hydraulic assessment to confirm appropriate pipeline performance, balancing pump rotors and incorporating heavy inertia bases and flexible connectors on pumps where required. This standard design process will ensure that the pipeline operates as intended and that noise from water flow within the underground pipeline is not expected to be audible. It will also ensure that vibration from the pumping systems will not be perceptible at NVSRs. These SSDPs and good practice design provide a level of surety that the noise and vibration from operation of the Project will not adversely affect residential property or cause a loss of amenity. Those affected by compulsory acquisition or temporary possession under the draft DCO [APP-023] may be entitled to compensation in line with the Compensation Code and relevant statutory provisions. The Applicant has confirmed sufficient resources to meet these obligations as set out in the Funding Statement. The Applicant has included the minimum amount of land necessary to deliver the authorised development within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant will only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the authorised development. The Applicant aims to work collaboratively with landowners to address concerns and agree practical solutions wherever practicable. Affected landowners are also entitled to seek independent professional advice and reimbursement of associated costs may be provided in accordance with established law and practice if the DCO is granted.
RR-142-5	Landowner engagement	Southern Water must indemnify me and any future owners of my property for problems getting insurance or a mortgages on my land or property and pay damages incurred due to the Pipeline or any ancillary equipment (Brakes in pressure tanks and pumps etc) this must include noise. I am sure you are aware of the problems with getting insurance/mortgage, we would have to say we have a large high pressure water main under the house, if we can't get insurance/mortgage it will cost more, who pays !	Given the depth of the proposed tunnel, the Applicant does not anticipate landowners to encounter issues obtaining insurance or a mortgage on their property. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of the Project in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-142-6	Landowner engagement	Who is going to buy a house with a 4m pipe under it, how do you get a mortgage. Southern Water must pay compensation. The £50 to buy right below 2.5 m of my house, would mean half my house, as its under ground.	The Applicant is not aware of any evidence that other tunnel-related projects have led to increased difficulties in obtaining a mortgage or selling a property. Notwithstanding this, the Applicant confirms that compensation will be paid for

Reference	Theme	Issue raised	The Applicant's response
			any reasonable and substantiated losses arising as a result of the Project in accordance with the Compensation Code. The Applicant confirms that the practice of adopting a fixed value compensation scheme has been used by other major infrastructure projects where rights within the subsoil for tunnelling were acquired. The Applicant confirms acceptance of the compensation offered will not be mandatory and the respondent will be able to follow statutory process for agreeing compensation should they consider their losses to be higher than the amount offered. The Applicant completed a site visit on 8th September 2026 and has subsequently obtained further drawings of the property and confirms that these will be considered at the detailed design phase.
RR-142-7	Location of the proposed pipeline routes	I am in the process of installing ground source heat pumps that will run were the pipeline is shown to run.	The final design of the Pipeline will be determined at the detailed design stage. Prior to construction of the Project, engagement will be undertaken with landowners to determine the final location of the pipeline. A full utility survey would be carried out by the contractor, once appointed, to locate any service in the vicinity of the pipeline route as part of this engagement. The DCO application provides for further investigation where necessary, with relevant measures secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). The Contractor will refresh data on the locations of utilities at reasonable appropriate points during the design and construction of the Project to provide relevant information to plan, manage, monitor and co-ordinate health and safety in the construction phase. The risk of damage to utilities will be managed through the Contractor's Permit to Dig which will include details for avoidance of utilities and an emergency response which will be employed should a utility be damaged.

Table 2-28 The Applicant's response to RR-144 from Ian Cufley

Reference	Theme	Issue raised	The Applicant's response
RR-144-1	Principle of development	I am in the process of installing ground source heat pumps that will run were the pipeline is shown to run.	The final design of the Pipeline will be determined at the detailed design stage. Prior to construction of the Project, engagement will be undertaken with landowners to determine the final location of the pipeline. A full utility survey would be carried out by the contractor, once appointed, to locate any service in the vicinity of the pipeline route as part of this engagement. The DCO application provides for further investigation where necessary, with relevant measures secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). The Contractor will refresh data on the locations of utilities at reasonable appropriate points during the design and construction of the Project to provide relevant information to plan, manage, monitor and co-ordinate health and safety in the construction phase. The risk of damage to

Reference	Theme	Issue raised	The Applicant's response
			utilities will be managed through the Contractor's Permit to Dig which will include details for avoidance of utilities and an emergency response which will be employed should a utility be damaged.
RR-144-2	Attitudes to water recycling	Highly treated or not, I do not think that it would be an exaggeration to say that the vast majority of people would be disgusted at the thought of drinking wastewater, and I believe that it will lead to a huge increase in consumption of bottled water, which of course will mean a huge increase in plastic waste.	The Project is not proposing the use of treated wastewater as drinking water. Treated wastewater would undergo a high level of treatment before it is mixed with spring water and the wider environment in Havant Thicket Reservoir. Following this, the water would be subject to further treatment prior to it being suitable for public supply. Water recycling is a well-established and internationally proven technology, successfully implemented in countries such as the United States, Australia and Singapore. In the UK, water recycling can be delivered safely, with robust regulatory requirements that need to be demonstrated by water companies before recycled water can be put into supply, as confirmed by the Drinking Water Inspectorate (DWI). Water supplied to the public would meet these high safety and quality standards; notably being subject to rigorous regulatory oversight, including comprehensive risk assessment, advanced multi-barrier treatment processes, and continuous monitoring to ensure compliance with the Water Supply (Water Quality) Regulations 2016. The Applicant recognises that public perception and trust are essential and is committed to ongoing engagement to communicate how effective water recycling technology is in producing wholesome drinking water. With these measures, the public can have confidence in the safety and reliability of the water supplied. Introducing recycled water is not expected to significantly increase bottled water consumption.
RR-144-3	Alternatives	With the amount of rainfall that we have in this country, surely there are other ways to secure a year round supply of clean drinking water without embarking on this totally misguided project. I am sure a hosepipe ban during a rainless summer would probably be sufficient to do the job.	New reservoirs, as a potential means of capturing and storing rainfall, have been considered as part of the Applicant's WRMP process. However, these take a significant amount of time to develop, carry their own environmental impacts, and cannot rely on capturing and storing rainfall alone to provide the necessary volumes in Hampshire and would therefore there would need to be a continued reliance on river abstractions that the Applicant is required to reduce. The Applicant is already investing significantly in Havant Thicket Reservoir and the White Horse Reservoir, but these are fed by springs and rivers respectively. Havant Thicket Reservoir plays a critical role in the Project by augmenting the volume of water that can be delivered to the Applicant's Otterbourne Water Supply Works. Implementing a hose pipe ban during the summer would not be a suitable method of responding to the current or future water resource challenges faced in Hampshire.

Reference	Theme	Issue raised	The Applicant's response
RR-144-4	Location of the proposed pipeline routes	The reason we have been invited to give our representation is that the proposed pipeline is planned to possibly run under our house. This seems to be another madness, considering there is an empty agricultural purposed field literally metres away that would run parallel with a large part of the proposed pipeline.	The Scheme Development Report [APP-073, APP-074, APP-075] sets out the criteria that have been used to develop the design of the Project, which includes various technical, environmental and planning criteria which have been informed by national and local policy. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. Flexibility has been retained in the design of the Pipeline between the WRP site and Portsdown Hill as this would be constructed as a tunnel, and further refinement will be undertaken at the detailed design stage following investigations and engagement with National Highways and Network Rail. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs. The Applicant has issued an FAQ document to homeowners who may be impacted by the tunnel works which give further context to the rights sort. The FAQ includes information such as: • The tunnel having an approximate external diameter of 4m. • The depth of the tunnel generally being no less than 15 metres, which is reflected in the updated version of the Design Principles Document submitted at Deadline 1 (Document reference 5.11, DCO Volume 5, Version 1). • How the tunnel is constructed. • Confirmation of the process to acquire the necessary rights and the compensation arising. • When it is anticipated the acquisition of subsoil rights would take place.

Table 2-29 The Applicant's response to RR-148 from Ian Judd and Partners

Reference	Theme	Issue raised	The Applicant's response
RR-148-1	Greeting	Please see supporting email Relevant Representation: Hampshire Water Transfer and Water Recycling Project Examination Submission on behalf of Henry Brice MRICS, FAAV, Partner of Ian Judd and Partners, Rural Chartered Surveyor and Land Agents.	The Applicant notes this comment.

Reference	Theme	Issue raised	The Applicant's response
RR-148-2	Landowner engagement	1. Introduction 1.1. Ian Judd and Partners is an independent firm of Rural Chartered Surveyors based in Bishop's Waltham. I am the principal partner dealing with this scheme and act as professional agent on behalf of landowners and tenants whose land is proposed to be affected by the project. 1.2. We act for around 35 different land interests, ranging from small private individuals, whose private paddocks are being impacted to larger farming clients. I understand that Ian Judd and Partners act for around 20% of Landowners affected by this scheme.	The Applicant notes this comment.
RR-148-3	Principle of development	2. Background 2.1. I have been involved in this project since around 2021. It should be noted that I have acted against Southern Water on other projects affecting landowners locally. This project has been difficult from the start. 2.2. Very few of my clients oppose new water infrastructure, if that infrastructure is well designed and necessary and if the impact of the infrastructure on their land is minimised as much as possible. However, this scheme, using sewage as drinking water, does not sit well with many.	The Project does not propose the use of sewage or treated wastewater as drinking water. The Project will take highly treated wastewater to produce purified recycled water through a multi-barrier treatment process. This recycled water would be transferred to Havant Thicket Reservoir where it would mix with spring water. The water within Havant Thicket Reservoir would then be transferred to Otterbourne WSW where it would be subject to further treatment before supply to customers. Water recycling is a well-established and internationally proven technology that has been successfully implemented in countries such as the United States, Australia, and Singapore for over 40 years. Extensive engagement has been undertaken with landowners throughout the development of the Project to minimise impacts on land and property, as evidenced in section 8 of the Statement of Engagement [APP-072].
RR-148-4	Landowner engagement	2.3. For an unknown reason, Southern Water through both sets of agents, Fisher German and Dalcour Maclaren and their own internal agents, have taken a more aggressive stance towards landowners than any other utility project I have been involved in. They have actively sought to frustrate and work against landowners. Southern Water are unwilling to enter discussion with landowners, with their preference at every stage to use statutory powers and force to take entry to land. This has made the project particularly difficult to be involved with. 2.4. I have tried to work with Southern Waters agents, however at every opportunity they have been total inflexible, returning to threats of compulsion and been unwilling to work with landowners to find sensible solutions to issues.	The Applicant does not recognise the accusations levelled at its approach to landowners and firmly refutes the suggestion that it has sought to frustrate or work against landowners or that it has been unwilling to engage in discussions to identify sensible solutions. The Applicant remains committed to working collaboratively with landowners and its clear preference is to secure voluntary agreements for access and the acquisition of land and rights wherever possible. As outlined in the Statement of Reasons [APP-025], the Applicant has sought to acquire the land and associated rights by voluntary agreement in order to facilitate delivery of the Project. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with landowners regarding voluntary agreements and has continued discussions with landowners.. To facilitate collective engagement on voluntary agreements, a number of professional representatives formed a Land Agent Group in February 2025. The Applicant issued draft Heads of Terms to the Land Agent Group on 3 February 2025 and subsequently engaged in negotiations on the terms. This engagement included in-person

Reference	Theme	Issue raised	The Applicant's response
			meetings with the Land Agent Group and several revisions to both the Heads of Terms and the commercial offering in response to feedback received. Following these discussions, the Applicant commenced issuing Heads of Terms to all landowners on 6 March 2026. Since acceptance of the DCO application for Examination, the Applicant has made further amendments to clauses within the proposed Heads of Terms and an improved commercial offer to landowners, further demonstrating reasonable efforts to engage constructively and reach a voluntary agreement. During discussions with landowners, the Applicant has acted responsibly in making landowners aware of the statutory alternatives available, should a voluntary agreement not be reached. In relation to surveys, the use of statutory powers under Section 172 of the Housing and Planning Act 2016 has only been pursued following reasonable attempts to secure access by voluntary agreement. The Applicant continues to offer meetings with landowners and their professional representatives to discuss Heads of Terms and reiterates its preference to reach a voluntary agreement wherever possible.
RR-148-5	Alternatives	3. Route Selection and Alternatives 3.1. I do not believe Southern Water have adequately given proper consideration to any alternative routes, this has been their preferred route from the start and they did limited public consultation on other routes as a "box ticking exercise". There were never really any genuine alternative routes considered.	The Applicant undertook public consultation on the design of the Project in 2022, 2024 and 2025. At the Summer 2022 Consultation the Applicant presented the various pipeline corridors it had identified and evaluated to select a preferred pipeline corridor. The consultation sought views on the process that was undertaken to identify, evaluate and select the preferred pipeline corridor. At the Summer 2024 Consultation the Applicant presented the draft Order Limits, construction compound locations and AGP sites, and consulted on the process to select these and the alternatives that were considered. At the Spring 2025 Consultation the Applicant consulted on a number of design refinements that were made in response to feedback received at the 2024 consultation The Scheme Development Report [APP-073, APP-074, APP-075] sets out the extensive route and site selection process that was undertaken.
RR-148-6	Consultation	3.2. The public consultations in 2024 and 2025 were not fit for purpose. It felt like a lip-service exercise undertaken by Southern Water only to comply with the statutory process. Many of our clients made representations, however most comments have been completely ignored. Southern Water haven't made any effort to amend their scheme.	Section 47 of the PA 2008 is the duty of the Applicant to consult with the local community. The Consultation Report [APP-029] demonstrates conclusively that the Applicant has complied with the requirements of Section 47 of the PA 2008. This was also the view of all seven host local authorities when the Applicant consulted them in preparing the Adequacy of Consultation Milestone submission as part of the pre application procedure and subsequently confirmed through their Adequacy of Consultation Representations. The Planning Inspectorate concurred and the application has now been accepted. As well as undertaking statutory compliant consultations, the Applicant sought to carry out open, inclusive and proportionate pre-application consultation. The

Reference	Theme	Issue raised	The Applicant's response
			Applicant considered the Gunning Principles to make sure that consultation was fair, lawful and a worthwhile exercise for the Applicant and consultees, including landowners. Please see Table 3-1 in the Consultation Report [APP-029] for further detail about how the Applicant had regard to the Gunning Principles. Alongside formal consultation stages, the Applicant undertook ongoing engagement with landowners to inform refinements to the Project and the design of the AGP and pipeline routes. The Applicant has had regard to all consultation feedback, which has informed the design of the Project. The Scheme Development Report [APP-073, APP-074, APP-075] and the Consultation Report [APP-029] set out the process that has been undertaken to design the Project and sets out how feedback from landowners and other stakeholders has been considered. Furthermore, following the Summer 2024 Consultation, the Statutory Consultations were largely focused on design changes that arose from considering feedback from landowners. The Applicant considered matters raised by landowners and reviewed whether alternative designs could mitigate these without introducing any new deliverability, environmental or land related risks or impacts. In the event that an alternative design would increase these risks or impacts, the alternative design may not have been progressed.
RR-148-7	Location of proposed pipeline routes	3.3. The route chosen is through semi urbanised South Hampshire, made up of small land holdings, owned primarily as private investments adjacent to larger high value residential properties. The total number of landholdings affected is significantly higher than alternative options.	The total number of landholdings intersected was not a major consideration when considering alternative options. Instead, the Applicant considered a range of engineering, planning and environmental criteria as set out in the Scheme Development Report [APP-073, APP-074, APP-075], so that the Project could be built efficiently whilst reducing impacts on the local community and the environment.
RR-148-8	Alternatives	3.4. The most obvious alternative option is to go through the South Downs National Park, this would impact very few residents and impact larger arable fields, going through chalk and free draining ground. This has been dismissed from the start by Southern Water.	As set out in the Scheme Development Report [APP-073, APP-074, APP-075], the Applicant considered pipeline corridors through the South Downs National Park (and consulted on these at the Summer 2022 Consultation), however national parks are afforded a very high level of protection in national planning policy, including the National Policy Statement for Water Resources Infrastructure. As a result of this, the Project selected pipeline corridors that did not intersect with the South Downs National Park.
RR-148-9	Location of proposed pipeline routes	4. Ground Conditions 4.1. The route chosen by Southern Water is extremely wet, part of the route (Otterborne to Bishops Waltham) are deep heavy clays, with very poor drainage, much is a bog all winter. It is going to extremely difficult (if not impossible) and expensive to lay a pipe in this area. 250m north is free draining chalkland, this option has been excluded due to the national park.	The Applicant notes this comment. The design process has considered the potential for surface water flooding and has sought to avoid areas at high risk of surface water flooding where possible. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) sets out measures that will be implemented to avoid increasing flood risk and manage working in areas at risk of flooding. As set out in the Scheme Development Report [APP-073, APP-074, APP-075], the Applicant considered pipeline corridors through the South Downs National

Reference	Theme	Issue raised	The Applicant's response
		4.2. Southern Water should speak to Esso, who laid a pipe to the west of Bishop's Waltham 5 years ago. The construction was delayed by 2 years due to ground conditions in this area being extremely wet.	Park (and consulted on these at the Summer 2022 Consultation), however national parks are afforded a very high level of protection in national planning policy, including the National Policy Statement for Water Resources Infrastructure. As a result of this, the Project selected pipeline corridors that did not intersect with the South Downs National Park.
RR-148-10	Land use and agriculture	4.3. We are experiencing wetter winters, the land is going to flood, particularly when subsoil is damaged. Much more consideration needed to be given to this element of the scheme. 4.4. The soil damage has the potential to permanently destroy farmland, cause flooding of homes and business, pollute ditches and chalk streams and significantly delay this project.	The Applicant acknowledges the concerns regarding waterlogged ground conditions, potential flooding, soil compaction and the long-term productivity of agricultural land. The Outline Soil Resource Management Plan (SRMP), as contained in Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), acknowledges that the main adverse impacts on soils during construction occur as a result of handling in inappropriate conditions, notably compaction and smearing when handling soils that are too wet. Paragraphs B.9.1 to B.9.14 of the Outline SRMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), set out the methods for determining appropriate soil handling conditions and criteria for when soil handling may or may not take place and specify that soil handling should only take place in suitable soil moisture and weather conditions. The provisions of the SRMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), ensure, through the adoption of industry good practice for soil handling, storage and reinstatement, that damage to soil is avoided or minimised, and that soil structures are maintained, such that the land can be reinstated to its original use as soon as practicable following the installation of the pipeline. Measures to protect water courses are also included within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and assessed within ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1). These measures include controls to minimise sediment runoff and pollution risks and are intended to protect nearby watercourses and drainage features during construction. In addition, land temporarily required for pipeline construction would be reinstated in accordance with the Outline SRMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), to enable its return to its existing agricultural use.
RR-148-11	Landowner engagement	5. Justification for need for Compulsory Powers 5.1. The Department for Communities and Local Government, Planning Act 2008, Guidance related to Procedures for the compulsory acquisition of land (CA Guidance), sets out the requirements Acquiring Authorities should meet to be granted CPO powers. 5.2. Para 6. "provides that a development consent order may only authorise compulsory acquisition if the Secretary of State is satisfied that: - the land is required for the development to which the consent relates, or is required to facilitate, or is incidental to, the development,"□.	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the

Reference	Theme	Issue raised	The Applicant's response
		5.3. Para 8. "The applicant will also need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate"	Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance.
RR-148-12	Landowner engagement	5.4. Para 9. "The applicant must have a clear idea of how they intend to use the land which it is proposed to acquire. 5.5. Para 11. Section 122 of the Planning Act sets out two conditions which must be met to the satisfaction of the Secretary of State before compulsory acquisition can be authorised. The first of these is related to the purpose for which compulsory acquisition is sought. These three purposes are set out in section 122(2): (i) the land is required for the development to which the development consent relates. For this to be met, the applicant should be able to demonstrate to the satisfaction of the Secretary of State that the land in question is needed for the development for which consent is sought. The Secretary of State will need to be satisfied that the land to be acquired is no more than is reasonably required for the purposes of the development. (ii) the land is required to facilitate or is incidental to the proposed development. An example might be the acquisition of land for the purposes of landscaping the project. In such a case the Secretary of State will need to be satisfied that the development could only be landscaped to a satisfactory standard if the land in question were to be compulsorily acquired, and that the land to be taken is no more than is reasonably necessary for that purpose, and that is proportionate.	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project.
RR-148-13	Location of proposed pipeline routes	5.6. It is clear from Southern Water's submission that they have not been able to demonstrate that all of the land included within their Order Limits is required for the development or required to facilitate or is incidental to the development. Southern Water have not yet designed the projected, they don't yet know what land they require and therefore have opted to include significant quantities of land that they can not evidence is required. They don't know how they intend to use the land they take and it is clear that more has been included than is reasonably necessary or proportionate to the laying of a 800mm water pipe.	The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The design of the Project as set out in the DCO application provides flexibility for refinement informed by further surveys and investigations at the detailed design stage. The detailed design will be developed following approval of the DCO application and the appointment of a Contractor. This approach ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-148-14	Location of proposed pipeline routes	6. Scale of Order Limits, Limits of Deviation, Working Widths, Compounds and Easement Width 6.1. Only land that is proven necessary and proportionate should be included within the scheme. 6.2. In many cases the Order Limits are 100m+ wide, for a pipeline that is 0.8m wide, Southern Water have been unable to provide a clear idea of how	The Order Limits provide flexibility for the working width to be sited dependent on the position at the time of construction. This will be confirmed once the detailed design of the Project has been undertaken following approval of the DCO application. The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction

Reference	Theme	Issue raised	The Applicant's response
		they intend to use this land. It should be reduced to that which is necessary and proportionate.	working areas, storage areas, pipeline trench and soil storage areas. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m for a maximum length of 42m. In accordance with the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition have been met. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits, whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) sets out the maximum diameter of the pipelines for the different Project components, which may be greater than the 800mm referenced by the Respondent. The Applicant considers the permanent rights sought are justified in order to protect and preserve the integrity of the Project.
RR-148-15	The process of developing the Project	6.3. The limits of deviation are also far too wide, in many cases 100m+. Southern Water have chosen not to undertake detailed design of the pipe, yet they are unable to provide a clear idea of how they intend to use the land which it is proposed to acquire. Far more investigation is required to enable Southern Water to undertake detailed design. I believe the DCO should be withdrawn until these works have been undertaken and then resubmitted with significantly less land included. 6.4. The justification for the Working Width is lacking any credibility, below is an exact Graphic 3-3 Para 3.5.92 document Reference 6.1.	The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The Order Limits and Limits of Deviation provide flexibility for the works to be sited dependent on the position at the time of construction. This will be confirmed once the detailed design of the Project has been undertaken following approval of the DCO application and the appointment of a Contractor. This approach ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs. Given the urgent need to implement the Project to ensure future water supplies in Hampshire, it would not be feasible to delay the DCO application until after all surveys and detailed designs have been undertaken. This would significantly delay the implementation of the Project and require significant expenditure prior to the Project being consented.
RR-148-16	Location of proposed pipeline routes	6.5. The submitted documents stated (Para 3.3.3 Document Reference 4.1) that the maximum working width is 40m. Yet later (para 3.3.1 Document Reference 4.1- please note numbering error in document) the working width may be up to 50m. A 50m corridor through open countryside, will have significant visual impact.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. When intersecting sensitive constraints such as vegetation and roads, a reduced

Reference	Theme	Issue raised	The Applicant's response
		6.6. The indicative drawing has a "Working Area and Haul Road"□ of 11m and a pipe trench 4m wide. This is excessive, yet only totals 15m in width. They want a further 25m for topsoil and subsoil storage. Completely disproportionate. "The applicant must have a clear idea of how they intend to use the land which it is proposed to acquire".	working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m for a maximum length of 42m.
RR-148-17	Location of proposed pipeline routes	6.7. I have undertaken a simple calculation of what may be needed as a working width - The Haul Road may be 3m wide, with occasional passing places, - Working area 8m, this allows 6m of digger working area, plus 2m pipe storage - Pipe width - this will be 1.5m plus say 1.5m each side of pipe = 4.5m - Topsoil Storage - A fair estimate is to assume 150mm of top soil, across 20m equates to 3m³ of top soil, stacked at 1:2, say 2.5m x 1.25m = 3.75m³, therefore 2.5m for topsoil storage. - Sub-soil Storage - If the trench is 4m wide and assume a depth of 2m (2.15m below ground level) deep 7.5m3 of subsoil, again assume 1:2 stack equates to 4m of subsoil storage. - Excess 2m excess for fencing and other uses - Total working area required - 24m in width	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, which is secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide the necessary space for a haul road, construction working areas, material storage areas, pipeline trench and soil storage areas. This is set out at section 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m, over a distance of a maximum of 42m. The haul road/working area must be a sufficient width to allow a suitably sized excavator to track back at 90 degrees to the pipe to lift it and then lower into the trench. A suitably sized excavator capable of carrying out a tandem lift of a string of pipes would circa 11m long hence the 11m required. The working area for the trench excavation is calculated using the width of the excavator capable of pipeline installation (circa 3.5m) and a 2m deviation of the pipeline route in each direction without compromising the pipelaying process. If the pipeline has to change direction the joints are designed to allow a slight angle deviation to alter the direction this is a gradual process and requires sufficient space to allow for it. Therefore, a total of 7.5m. The pipe storage/jointing area must be wide enough to allow the pipes to be welded together to form the strings before lowering into the trench. As there will be welders working on this while the excavator is operating a 1m safety exclusion zone has to be in place. The total of the pipe storage/jointing area is therefore a total of 3.5m The area required for topsoil storage is based on topsoil being 200mm thick, which equates to $8m^3$ for a 40m working width. With a side slope of 1:1 and maximum height of 1.8m an area of 7m has been allocated which includes for any bulking factor. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The area required for subsoil provides enough width in this area to segregate upper and lower subsoils, therefore there would be two separate mounds, which ensures the subsoil can be reinstated properly. A 1:1 side slope and a bulking factor has been incorporated which equates to 7m. Either side of the

Reference	Theme	Issue raised	The Applicant's response
			stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The above areas equate to a working width of 40m.
RR-148-18	Location of proposed pipeline routes	6.8. It is completely unjustified, unreasonable, unnecessary and disproportionate to permit a working area greater than 24m in width for open cut sections of pipe. We ask the Secretary of State to restrict the working area to no more than 24m in width.	Please refer to the Applicant's response to RR-148-17.
RR-148-19	Landowner engagement	6.9. If Southern Water wish to use additional space this can be done by agreement at a market rent with individual landowners.	The Applicant has set out where land over which powers of temporary possession only are sought is shown edged black and shaded yellow on the Land Plans (Document reference 2.2, DCO Volume 2, Version 2). The Applicant is also seeking temporary possession powers over all other land within the Order Land, to facilitate the construction of the project. The land over which these powers are sought is shown edged black and shaded pink or blue on the Land Plans (Document reference 2.2, DCO Volume 2, Version 2). The Applicant has been seeking voluntary agreements for all land identified for temporary use. Details of this engagement can be found within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1). As detailed within the Statement of Reasons [APP-025], temporary possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the project. Whilst the Applicant's preference is to reach a voluntary agreement, it considers that the temporary possession powers sought within the DCO are necessary to ensure that the project can be delivered where agreement cannot be reached. Reasonable losses incurred by landowners arising out of the temporary use of land will be reimbursed in line with the compensation code. The Applicant therefore considers that the temporary possession powers sought are justified and proportionate, whilst maintaining that a voluntary agreement remains its preferred outcome where possible.
RR-148-20	Construction compound locations	6.10. Southern Water have included a large number of compounds. They have provided some sketches of the compounds. It is clear from these sketches that they do can not clearly show how this space will be used and the area should be significantly reduced. 6.11. The volume of land set-aside for compound is unjustified and unnecessary. There is ample open yard space available to rent locally, why are southern water using compulsory purchase rights to turn countryside into commercial compounds, when this space can be rented in the market.	A number of temporary construction compounds are required to support construction of the Project. This includes sectional site compounds at intervals along the Pipeline, trenchless construction compounds and water storage lagoon construction compounds. These are explained from paragraph 3.5.129 to paragraph 3.5.145 of ES Chapter 3 Description of the Proposed Development [APP-082]. If part of the required construction storage were to be located off-site, this would significantly increase the duration of construction works and the number of construction vehicle movements on the highway network. Both of

Reference	Theme	Issue raised	The Applicant's response
		6.12. Southern Water can either rent existing commercial space in the locality or pay a commercial rate to landowners to use the compounds identified, reducing the need to include this space within the compulsory purchase areas.	these factors would result in adverse impacts on the environment and local communities.
RR-148-21	Landowner engagement	7. Alternative to Compulsory Purchase 7.1. Southern Water have made no effort to reach any form of agreement outside of the compulsory purchase process. 7.2. The CA Guidance states the application should consider all reasonable alternatives to Compulsory Acquisition. It is clear this has not been the case and Southern Water have no intention to reach any form of Private Agreement.	The Applicant refutes the statement that there has been no effort made to reach any form of agreement. The Applicant is committed to working collaboratively with landowners and it remains the Applicant's firm preference to reach a voluntary agreement for the acquisition of land and rights where possible. As detailed within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken extensive attempts to meaningfully engage with landowners on voluntary agreements and has continued to have productive discussions with them either directly or through their professional representatives. In February 2025 a number of the professional representatives formed a Land Agent Group to collectively consider and progress discussions on Heads of Terms for voluntary agreements to ensure that all land agents representing landowners impacted by the project were represented equally, regardless of land holding or perceived impact. The Applicant issued Heads of Terms to the Land Agent Group on 3 February 2025 to provide an opportunity to review the proposals and gather comments ahead of the first meeting between the Land Agent Group and the Applicant. The Land Agent Group provided their initial comments on the Heads of Terms on 24 February 2025. Following this, the Applicant undertook a multidisciplinary review of the comments made. In addition to this, several points were also referred to external consultants to ensure a comprehensive review was completed and that the terms were aligned with what was being sought in the DCO application. The Applicant responded to the Land Agent Group on 5 August 2025 with further updates to the Heads of Terms. The first Agent Group meeting was held on 10 September 2025 where the Applicant and the Land Agent Group reviewed and discussed comments on the Heads of Terms. There was a second meeting on 23 January 2026 to discuss further feedback from the Land Agent Group, after which the Applicant issued the final template for the Heads of Terms on 26 February 2026. Following this, the Applicant commenced issuing Heads of Terms to landowners on 6 March 2026. The Applicant then reviewed further feedback received in June 2026 from the Land Agent Group on both the terms and commercial offer. A third Land Agent Group meeting was held to discuss these points further on the 14 July 2026. Based on this feedback the Applicant wrote to all landowners on the 7 August 2026 with an improved commercial offer and amended terms to address further points from the Land Agent Group.

Reference	Theme	Issue raised	The Applicant's response
			The Applicant considers that this sustained programme of engagement and negotiation demonstrates that significant efforts have been made to secure voluntary agreements prior to, and alongside, the compulsory acquisition process. The Applicant refers to [RR-233] which acknowledges that the Applicant has negotiated terms. The Applicant remains willing to discuss voluntary agreements and has repeatedly offered site meetings to address the respondent's landowner-specific concerns. The Applicant therefore disagrees with the respondent's suggestion that alternatives to compulsory acquisition have not been considered, or that it has no intention of reaching agreement with affected landowners.
RR-148-22	Landowner engagement	7.3. Para 25 of the CA Guidance states "Applicants should seek to acquire land by negotiation wherever practicable. As a general rule, authority to acquire land compulsorily should only be sought as part of an order granting development consent if attempts to acquire by agreement fail"□. As a landowners agent, I do not believe that the Applicant (Southern Water) have adequately entered into any form on negotiation. They have dictated the terms they would offer, however they have been unwilling to enter into any form of negotiations. 7.4. No alternative dispute resolution has been sought, all landowners have received is the threat of compulsion if we don't accept the terms dictated. 7.5. This has led to a most negative environment between all landowners and Southern Water. If Southern Water are not prepared to work with landowners this scheme will be unworkable.	The Applicant remains committed to working collaboratively with landowners and disagrees with respondent's suggestion that they have been unwilling to enter into any form of negotiations. As detailed within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken extensive engagement with landowners regarding voluntary agreements and has continued discussions with landowners, either directly or through their professional representatives, since March 2026. The Applicant's preference is to secure voluntary agreements for the acquisition of land and rights wherever possible. The Applicant has not received any requests for alternative dispute resolution by the respondent or landowners. The Applicant confirms it would be open to using alternative dispute resolution should this be requested and there be sufficient clarity on the points in dispute. The Applicant has offered on site meetings to discuss a voluntary agreement and regularly been advised by the respondent that they do not wish to accept these invitations. It is the Applicant's preference to have a site meeting to understand the terms in dispute ahead of partaking in any alternative dispute resolution procedure, to ensure the points in dispute between the parties are understood.
RR-148-23	Landowner engagement	7.6. It is apparent from the Pre-application Land and Rights Negotiation Tracker (Document 4.4) only 1 landowner has returned Heads of Terms out of 172 Category 1 Landowners. 99.4% have not agreed terms. This indicates to me that 99.4% believe the terms are unreasonable and demonstrates that Southern Water's strategy is not to reach agreements with landowners but to rely on statutory powers to take rights in private property. 7.7. I do not believe Southern Water have acted in a manner expected of an Acquiring Authority and I do not believe compulsory purchase rights should be awarded to them. 7.8. I believe that the Secretary of State could reasonably justify granting development consent for the project, but decide against including in an order the provisions authorising the compulsory acquisition of the land. This would	Whilst the Applicant would prefer to be able to advise the Examining Authority of a higher return of signed Heads of Terms, it does not consider this to be because the terms offered to landowners are unreasonable. To date, despite formally requesting evidence demonstrating why the commercial offer is considered unreasonable on 28 January 2026, the Applicant is yet to receive a response. The Heads of Terms proposed by the Applicant closely align with those adopted across other utilities and infrastructure projects, which have also been reviewed and accepted by respective land agent groups. The Applicant understands the main point of contention by the Land Agent Group to be the commercial offer and considers the respondent's position on commercial terms to be unrealistic and significantly in excess of actual losses

Reference	Theme	Issue raised	The Applicant's response
		focus Southern Water to work with landowners and reach voluntary agreements with those who are impacted greatest by this project, the affected landowners and tenants.	incurred by affected parties as a result of the rights sought by the Project. The respondent has been provided with justification for the Applicant's position on commercial values on numerous occasions but is maintaining their high expectation. The Applicant refutes the suggestion that it seeks to rely on statutory powers and confirms its preference to reach a voluntary agreement. The Applicant has made several amendments to the proposed Heads of Terms as confirmed by a relevant representation made by a member of the Land Agent Group [RR-233] and improved the commercial offer during the negotiations to demonstrate this preference. The Applicant disagrees with the respondent's suggestion to grant the DCO without compulsory acquisition powers in accordance with Section 5 and Section 6 of the Statement of Reasons [APP-025]. Granting the DCO without compulsory acquisition powers would leave the Applicant in a position where, despite securing consent, the Project could not be delivered with certainty. Notwithstanding the respondent's position in this, there is no guarantee that a voluntary agreement would be reached even with further enhanced terms, rendering the Project unviable.
RR-148-24	Landowner engagement	8. Conclusion 8.1. For the reasons set out above, I do not consider that Southern Water has demonstrated that the compulsory acquisition powers sought are necessary, proportionate, or justified. The Applicant has not shown with sufficient clarity how all of the land within the Order Limits is required for the proposed development, nor has it demonstrated that the extent of land sought is no more than reasonably necessary. In my view, the breadth of the Order Limits, limits of deviation, working widths, compounds and permanent rights goes significantly beyond what can properly be justified for the construction and operation of an 800mm pipeline.	In accordance with the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition have been met. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits, whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) sets out the maximum diameter of the pipelines for the different Project components. The Applicant considers the permanent rights sought are justified in order to protect and preserve the integrity of the Project. See response RR-148-17 regarding the extent of the Order Limits, limits of deviation, working widths, compounds and permanent rights
RR-148-25	Location of proposed pipeline routes	8.2. The consultation and route selection process has also failed to give adequate weight to the practical impact on landowners, tenants and occupiers. Many affected interests have raised legitimate concerns, yet the scheme appears to have progressed with little meaningful amendment. The chosen route passes through fragmented semi-urban landholdings, private paddocks, gardens, smallholdings and farms, in areas where the effect on individual owners and occupiers will be substantial. I do not believe Southern Water has properly evidenced that less damaging or more practical alternatives have been fully and fairly assessed.	The Project has been designed using an extensive route selection process, considering a range of engineering, planning and environmental criteria as well as the potential for impact on existing land uses. This is set out in the Scheme Development Report [APP-073, APP-074, APP-075]. The Applicant has had regard to feedback and reviewed alternatives where these are available. In a number of locations, the Applicant has amended the design of the Project to reduce impacts on landowners' operations. However in some locations this has not been feasible or practicable where proposed amendments would result in additional or increased impacts on the environment or the deliverability of the Project.

Reference	Theme	Issue raised	The Applicant's response
RR-148-26	Construction impacts and effects	8.3. The ground conditions along parts of the route are of particular concern. The evidence and local experience indicate that sections of the proposed corridor are extremely wet, poorly drained and difficult to work. Construction in these conditions risks serious and long-term harm to soils, drainage systems, agricultural productivity, watercourses, nearby properties and businesses. These matters do not appear to have been given sufficient weight in the design of the scheme or in the extent of land proposed to be acquired.	The Applicant notes the landowner's comments regarding the characteristics of local soils and potential waterlogging. ES Appendix 12.1 Agricultural land quality [APP-169] identifies the Windsor soil association, comprising slowly permeable clayey soils with impeded drainage, as one of the most prevalent soil types within the Order Limits. Measures for the handling, storage and reinstatement of soils are set out within the Outline Soil Resources Management Plan (SRMP) contained in Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). Good construction practices set out in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), which is secured by a requirement in the DCO, will manage the effects of construction. The mitigation measures outlined in it will be carried forward and developed into detailed CEMPs, which will be produced by the Contractor prior to the commencement of construction of the Project. A Construction Drainage Plan will be developed to manage the quality and quantity of construction stage drainage. Measures required to be included in the Construction Drainage Plan are set out in the main body of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). The plan will be informed by surveys to locate drains and create pre-construction drawings to ensure appropriate reinstatement. The plan will be agreed with the EA and the relevant Lead Local Flood Authority post-DCO consent. It will include measures to minimise water within the working area and ensure ongoing drainage of surrounding land. To manage the effect of construction works, the Contractor will be required to sign up and adhere to the Considerate Constructors Scheme before commencement of the works as committed to in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3).
RR-148-27	Landowner engagement	8.4. I am also concerned that Southern Water has not behaved in the manner expected of an acquiring authority seeking compulsory powers. The statutory guidance makes clear that compulsory acquisition should be a last resort and that applicants should seek to acquire land and rights by negotiation wherever practicable. In this case, the approach taken has been dominated by fixed terms, threats of statutory entry and reliance on compulsion, rather than meaningful engagement, negotiation or alternative dispute resolution. The very low level of agreement reached with affected landowners is, in my view, strong evidence that the Applicant's approach has not been reasonable or effective. 8.5. In practical terms, the scheme could proceed in a far more proportionate way. Temporary working widths should be reduced to what is demonstrably required, which I consider should not exceed 24 metres for open-cut sections unless agreed otherwise with the relevant landowner. Additional land for compounds, storage, access or other temporary purposes should be secured by voluntary commercial agreement where it is genuinely needed. Existing	8.4.The Applicant acknowledges the concerns the respondent has raised regarding the discussions to date. However, the Applicant does not consider that this accurately reflects the approach taken by the Applicant. The Applicant's preference is to reach a voluntary agreement with landowners. The Applicant has made several amendments to the proposed Heads of Terms and improved the commercial offer in response to feedback received from landowners and their agents. In addition, the Heads of Terms proposed align with those adopted across other utilities and infrastructure projects, which have also been agreed by respective land agent groups. As detailed within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken extensive attempts to meaningfully engage with landowners on voluntary agreements. Since February 2025, the Applicant has continued to engage with the respondent through discussions with the Land Agent Group and, since acceptance of the DCO application, the Applicant has made further

Reference	Theme	Issue raised	The Applicant's response
		local commercial sites should be used wherever possible, rather than relying on compulsory powers to convert rural land into temporary compounds. 8.6. I therefore respectfully request that the Secretary of State gives careful consideration to whether the tests for compulsory acquisition have been met. I do not object in principle to necessary water infrastructure where it is properly designed, justified and delivered with due regard to those whose land and businesses are affected. However, on the evidence presently available, I do not believe Southern Water has justified the scale of compulsory powers sought. If development consent is granted, the compulsory acquisition provisions should either be refused or substantially narrowed, so that Southern Water is required to engage properly with landowners and tenants and to secure rights by agreement wherever possible.	amendments to the Heads of Terms and improved the commercial offer to landowners. The Applicant has, and will continue to make, reasonable efforts to reach voluntary agreements. Throughout these discussions, the Applicant has acted responsibly in making landowners aware of the statutory alternatives available, should a voluntary agreement not be reached. Where a voluntary agreement has not been reached to allow access for surveys, the Applicant has utilised the statutory powers available to it. A comprehensive set of survey data is necessary to inform the Environmental Impact Assessment and ensure the land impacted by the Project is understood and appropriately mitigated. The maximum working width for trenched open-cut construction of the Pipeline would be 40m, which is secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3)). This would provide the necessary space for a haul road, construction working areas, material storage areas, pipeline trench and soil storage areas. This is set out at section 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3)). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m, over a distance of a maximum of 42m.It would not be possible to use a reduced working width for the whole length of the Pipeline as this does not allow enough room for the normal pipe-laying operation and additional areas would be required to allow the storage of excavated material. A detailed breakdown of the required working width is included in RR-148-17. 8.6 As outlined in the Statement of Reasons [APP-025], the Applicant considers that the relevant tests for compulsory acquisition have been met. However, it remains the Applicant's preference and approach to reach a voluntary agreement and only use compulsory acquisition powers if no agreement can be obtained. The Applicant will continue to engage with affected landowners.

Table 2-30 The Applicant's response to RR-158 from Ian Judd and Partners on behalf of Jill Corner

Reference	Theme	Issue raised	The Applicant's response
RR-158-1	Greeting	Please see Relevant Representation submitted by email. 1. Key Information Name of Interest party	The Applicant notes this comment.

Reference	Theme	Issue raised	The Applicant's response
		Jill Alexander Corner Address [REDACTED] Email Address [REDACTED] Telephone Number [REDACTED] Name & Address of Property Affected	
RR-158-2	Landowner engagement	Land at Sciviers Lane Land Plan Reference No: 21-005- 5038m2- Ni Rights Sought 21-006- 8934m2- Acquisition of Rights 21-007- 5051m2- No Rights Sought Linear length of pipe 172m Use of Land Private Leasure and Recreation- Equestrian Use Interest Parties on my land: Occupied by owner Land Agent Instructed: Ian Judd and Partners, 4 High Street, Bishops Waltham, Southampton, Hampshire, SO32 1AB â€“ [REDACTED] @ianjuddandpartners.co.uk [PLAN OF PROPERTY INCLUDED] 2. Summary of Submission 2.1. I wish to become an interested party and submit my strongest objection to this Development Consent Order Application. 3. Summary of Land Use 3.1. I own a total of 2.76 ha (6.81 acres) of land north of Sciviers Lane, Lower Upham. The land is used for keeping of my horses.	The Applicant notes this comment.
RR-158-3	Landowner engagement	4. Impact on use 4.1. 1.9ha of my land has been included within the Order Limits, 69% of the land I own. Whilst acquisition rights are being taken on 0.89ha (33%), 1/3 of my land will be affected. 4.2. The order limits server my stabling from the remaining grazing. It is going to be difficult to cross the working area with horses. I request that stables are built to the north of pipeline route.	As secured within the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), the Applicant confirms gates or gaps will be incorporated into temporary fencing where reasonably practicable to maintain access for the respondent. This will enable the respondent to access across the working width and thereby mitigate field severance. The Applicant has also made a specific commitment relating to maintaining access for landowners where reasonably practicable, which will be secured through the DCO and associated management plans. This measure is outlined

Reference	Theme	Issue raised	The Applicant's response
			in the Commitments Register (ES Appendix 5.5) [APP-108] reference Mit-GT 248. There will therefore be no requirement to erect new stables north of the pipeline route.
RR-158-4	Landowner engagement	5. Southern Waters Conduct to date 5.1. We have been disappointed in Southern Waters conduct to date. They, via their agents have been rude, incompetent, and threatened compulsory purchase at every encounter. They have not listened to our concerns or made any attempts to work with us. 5.2. We took part in the public consultation in 2024 & 2025, yet our concerns have never been taken seriously and have never been addressed. The public consultations were just a formality that Southern Water gave lip-service to. 5.3. They have been most aggressive, constantly threatening court and legal action, if we do not allow access for surveys. They have entered any form of negation to allow surveys on our terms.	The Applicant does not recognise the accusations levelled at its approach to landowners. The Applicant confirms that consultation responses were received from the respondent at both the 2024 and 2025 consultation events. The Applicant wrote to the respondent on 9 December 2025 with a response to this feedback addressing the points raised by the respondent. Within this correspondence, the Applicant confirmed that changes had been made to the compound alignment based on the feedback provided. Further information can also be found within the Consultation Report [APP-029]. During discussions with landowners, the Applicant has acted responsibly in making landowners aware of the statutory alternatives available, should voluntary agreements not be reached. In relation to surveys, the use of statutory powers under Section 172 of the Housing and Planning Act 2016 has been referenced in correspondence to ensure the respondent is aware of the statutory powers available to the Applicant, however the Applicant confirmed in the correspondence that these would only be relied upon following unsuccessful attempts to secure access by voluntary agreement. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with the respondent regarding a voluntary agreement. The Applicant's engagement has invited the respondent to provide information about their land but to date, no information has been shared.
RR-158-5	Landowner engagement	6. Need for Compulsory Purchase Powers 6.1. The Department for Communities and Local Government, Planning Act 2008, Guidance related to Procedures for the compulsory acquisition of land (CA Guidance), sets out the requirements Acquiring Authorities should meet to be granted CPO powers. 6.2. Para 6. "provides that a development consent order may only authorise compulsory acquisition if the Secretary of State is satisfied that: - the land is required for the development to which the consent relates, or is required to facilitate, or is incidental to, the development,"□. 6.3. Para 8. "The applicant will also need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate"	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance.

Reference	Theme	Issue raised	The Applicant's response
RR-158-6	Landowner engagement	6.4. Para 9. "The applicant must have a clear idea of how they intend to use the land which it is proposed to acquire. 6.5. Para 11. Section 122 of the Planning Act sets out two conditions which must be met to the satisfaction of the Secretary of State before compulsory acquisition can be authorised. The first of these is related to the purpose for which compulsory acquisition is sought. These three purposes are set out in section 122(2): (i) the land is required for the development to which the development consent relates. For this to be met, the applicant should be able to demonstrate to the satisfaction of the Secretary of State that the land in question is needed for the development for which consent is sought. The Secretary of State will need to be satisfied that the land to be acquired is no more than is reasonably required for the purposes of the development. (ii) the land is required to facilitate or is incidental to the proposed development. An example might be the acquisition of land for the purposes of landscaping the project. In such a case the Secretary of State will need to be satisfied that the development could only be landscaped to a satisfactory standard if the land in question were to be compulsorily acquired, and that the land to be taken is no more than is reasonably necessary for that purpose, and that is proportionate. 6.6. We believe that part of the land included within the order limits is not necessary to facilitate the scheme and the volume of land taken is not proportionate.	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance. The Applicant's proposed use of the land is set out in the Works Plans [APP-014] with detail of each Works Number set out in 'Schedule 1 – Authorised Development' to the Draft Development Consent Order [APP-023]. The respondent is affected by 'Works No.4 – Pipeline between the WRP site and Otterbourne WSW' for which the Applicant is seeking the acquisition of rights as set out on Sheet 21 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2) and 'Works No.7 – Environmental Mitigation and Enhancement Areas'. As detailed within the Statement of Reasons [APP-025], temporary possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the Project.
RR-158-7	Location of the proposed pipeline routes	6.7. The order limits are around of 55m in width. The corridor is parallel through my land, the order limits should be reduced to what is necessary for the scheme. 6.8. The Acquiring Authority have not provided any justification for the scale/quantum of the Order Limits. They have stated (Para 3.3.3 Document Reference 4.1) that the maximum working width is 40m. Yet later (para 3.3.1 Document Reference 4.1- please note numbering error in document) the working width may be up to 50m. 6.9. We understand that Southern Water have chosen not to undertake detailed design and want an element of flexibility, this flexibility could be reduced to 20m in width. It is clear that the scale of the Order Limits is significantly more than is reasonably necessary or proportionate for a pipe that 0.8m in width. 6.10. We believe the Order Limits should be significantly reduced to a maximum of 20m. If the Acquiring Authority require greater area for unnecessary off-site storage, they can rent commercially available space off site.	The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The design of the Project as set out in the DCO application provides flexibility for refinement informed by further surveys and investigations at the detailed design stage. The detailed design will be developed following approval of the DCO application and the appointment of a Contractor. This approach ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs. The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. When

Reference	Theme	Issue raised	The Applicant's response
		6.11. There is nothing within their submission that provides a justification for this excessive width of the order Limits.	intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m for a maximum length of 42m. In accordance with the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition have been met. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits, whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) sets out the maximum diameter of the pipelines for the different Project components, which may be greater than the 800mm referenced by the Respondent. The Applicant considers the permanent rights sought are justified in order to protect and preserve the integrity of the Project.
RR-158-8	Construction impacts and effects	7. Scale of the Working Area 7.1. The justification for the working width is lacking any reality, below is an exact Graphic 3-3 Para 3.5.92 document Reference 6.1. [GRAPHIC INCLUDED]	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, which is secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide the necessary space for a haul road, construction working areas, material storage areas, pipeline trench and soil storage areas. This is set out at section 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3)). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m, over a distance of a maximum of 42m. The haul road/working area must be a sufficient width to allow a suitably sized excavator to track back at 90 degrees to the pipe to lift it and then lower into the trench. A suitably sized excavator capable of carrying out a tandem lift of a string of pipes would circa 11m long hence the 11m required. The working area for the trench excavation is calculated using the width of the excavator capable of pipeline installation (circa 3.5m) and a 2m deviation of the pipeline route in each direction without compromising the pipelaying process. If the pipeline has to change direction the joints are designed to allow a slight angle deviation to alter the direction this is a gradual process and requires sufficient space to allow for it. Therefore, a total of 7.5m.

Reference	Theme	Issue raised	The Applicant's response
			The pipe storage/jointing area must be wide enough to allow the pipes to be welded together to form the strings before lowering into the trench. As there will be welders working on this while the excavator is operating a 1m safety exclusion zone has to be in place. The total of the pipe storage/jointing area is therefore a total of 3.5m The area required for topsoil storage is based on topsoil being 200mm thick, which equates to $8m^3$ for a 40m working width. With a side slope of 1:1 and maximum height of 1.8m an area of 7m has been allocated which includes for any bulking factor. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The area required for subsoil provides enough width in this area to segregate upper and lower subsoils, therefore there would be two separate mounds, which ensures the subsoil can be reinstated properly. A 1:1 side slope and a bulking factor has been incorporated which equates to 7m. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The above areas equate to a working width of 40m.
RR-158-9	Construction impacts and effects	7.2. This has a "Working Area and Haul Road" of 11m and a pipe trench 4m wide. This is excessive, yet only totals 15m in width. They want a further 25m for topsoil and subsoil storage.	Please refer to the Applicant's response to RR-158-8.
RR-158-10	Location of the proposed pipeline routes	7.3. I have undertaken a simple calculation of what may be needed as a working width - The Haul Road may be 3m wide, with occasional passing places, - Working area 8m, this allows 6m of digger working area, plus 2m pipe storage - Pipe width - this will be 1.5m plus say 1.5m each side of pipe = 4.5m - Topsoil Storage - A fair estimate is to assume 150mm of top soil, across 20m equates to 3m3 of top soil, stacked at 1:2, say 2.5m x 1.25m = 3.75m3, therefore 2.5m for topsoil storage. - Sub-soil Storage - If the trench is 4m wide and assume a depth of 2m (2.15m below ground level) deep 7.5m3 of subsoil, again assume 1:2 stack equates to 4m of subsoil storage. - Excess 2m excess for fencing and other uses - Total working area required - 24m in width 7.4. It is completely unjustified, unreasonable and unnecessary for the purpose, and disproportionate to permit a working area greater than 24m in width for open cut sections of pipe. 7.5. If Southern Water wish to use additional space this can be done by agreement at a market rent with individual landowners.	Please refer to the Applicant's response to RR-158-8.

Reference	Theme	Issue raised	The Applicant's response
RR-158-11	Location of the proposed pipeline routes	8. Scale of Easement Width 8.1. We haven't been provided any justification of the easement width restriction. Southern Water requested a 11m easement for open cut, being 5.5m each side of the pipe, with permanent restriction place on this land. Yet for tunnelled section the easement has been reduced to 2.5m each side of the pipe. 8.2. We have assessed other water providers easement width and the typical easement width for an 800mm pipe is 8m total width. 8.3. We have requested justification for this easement width; this hasn't been supplied. We therefore believe this is unreasonable, unjustified and disproportionate and should be reduced.	The purpose of the easement is to protect the integrity and operational requirements of the pipeline and to ensure appropriate access for inspection, maintenance, repair and replacement activities. The required width has been determined following a detailed technical assessment, taking account of the pipeline's diameter, depth, construction methodology, location and operational function. For sections of pipeline installed using open-cut construction, the Applicant is seeking an easement width of 11m (5.5m either side of the pipeline). This reflects the access and operational requirements associated with maintaining and, if necessary, excavating the pipeline in the future. Notably, this represents a reduction from the Applicant's published stand-off guidance for water mains of a comparable size and depth [1], which would typically require a wider protected corridor. This reduction from the normal requirement has been communicated to landowners and their agents where this is being challenged. For sections constructed using trenchless techniques, a reduced easement width is considered appropriate, taking into account depth, construction methodology and location. As the pipeline is installed at greater depth and future maintenance or operational access would be undertaken from either side of the trenchless section rather than directly above it, the same level of restriction is not required. The easement width has therefore been tailored to reflect the differing operational requirements of the construction methodologies. The Applicant is therefore satisfied that the easement widths proposed represent the minimum reasonably required to protect the pipeline and secure its safe operation over its lifetime.
RR-158-12	Design principles	9. Environmental Mitigation Land 9.1. It is unclear why my land has been identified for environmental mitigations. To date Southern Water have not made any approach to discuss environmental mitigation on my property. 9.2. My preference is that my land is not included for Environmental Mitigation and the order limits are reduced.	The Applicant has identified a number of opportunities to provide additional environmental enhancements in and around the Project. The Applicant has proposed that other neutral grassland habitat could be created on this land, as set out under design principle EMEA-K-5 in the Design Principles Document [APP-076]. As shown on Sheet 21 of the Land Plans – 3 of 3 documents [AS-006], the DCO application does not seek any powers to acquire interests in land compulsorily to implement these environmental enhancements, and therefore the Applicant will only deliver these subject to reaching an agreement with the landowner. The Applicant wrote to the respondent and their land agent on the 3 September 2026 to seek a meeting to discuss the Project proposals with them and gain feedback on whether they would be amenable to a voluntary agreement. The Applicant will continue to engage with the respondent and their land agent on this matter.
RR-158-13	Landowner engagement	10. Private Negotiations and Alternative to Compulsory Purchase 10.1. We understand that it is not for the planning Inspectorate to comment on the terms of any private negotiated agreements. We must comment that	The Applicant does not recognise the accusations levelled at its approach. The Applicant remains committed to working collaboratively with landowners and disagrees with the respondent's suggestion that it has been unwilling to

Reference	Theme	Issue raised	The Applicant's response
		Southern Water have been impossible to work with. They have dictated terms, without giving any consideration to amending the terms. The terms offered are significantly worse that those under compulsory acquisition. 10.2. They are only playing lip-service and have no intention of reaching any form of settlement with Landowners and Occupiers. This is apparent from the Pre-application Land and Rights Negotiation Tracker (Document 4.4) only 1 landowner has returned Heads of Terms out of 172 Category 1 Landowners. The one that has been returned is a middle section of a drill section, so no above ground access is needed. 0.58% sign up rate, clearly demonstrates that Southern Water have not made any significant effort to reach agreement with Landowners and Interested Parties and they are relying on taking land by compulsion. 10.3. Not a single Option Agreement has been entered into. 10.4. I believe it is disingenuous to categorize me as "Head of Terms negotiation on-going"□ (yellow status). This is not true, Southern Water have shown no interest in reaching an agreement with us. I request that my status is amended to "Heads of Terms agreements unlikely before close of examination (red)"	enter into any form of negotiations. The Applicant has made several amendments to the proposed Heads of Terms as confirmed by a relevant representation made by a member of the Land Agent Group [RR-233] and improved the commercial offer during the negotiations to demonstrate this preference. Whilst the Applicant would prefer to be able to advise the Examining Authority of a higher return of signed Heads of Terms, it does not consider this to be because the terms offered to the respondent are unreasonable. To date, despite formally requesting evidence demonstrating why the commercial offer is considered unreasonable on 28 January 2026, the Applicant is yet to receive a response. The Heads of Terms proposed by the Applicant closely align with those adopted across other utilities and infrastructure projects, which have also been reviewed and accepted by respective land agent groups. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with landowners regarding a voluntary agreement. The Applicant refutes the suggestion that it seeks to rely on statutory powers and confirms its preference to reach a voluntary agreement. The status recorded by the Applicant in the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1) does not indicate that voluntary agreement is agreed. Given that Heads of Terms for a voluntary agreement have been issued and are being discussed with the respondent's representative, the status has been reflected accordingly. Following the Heads of Terms being issued on 6 March 2026, the Applicant discussed the Heads of Terms with the respondent's representative at a meeting on 13 May 2026. Following this, the Applicant requested a further meeting on 17 July 2026 and, after issuing revised Heads of Terms on 7 August 2026 incorporating amended provisions and improved commercial terms, sought an additional meeting with the respondent's agent on 11 September 2026, evidencing the Applicant's attempts to reach a voluntary agreement. The Applicant will continue to engage with the respondent in an attempt to secure a voluntary agreement. The Applicant has organised a site meeting with the respondent and their representative on 24 November 2026 to discuss their feedback further.
RR-158-14	Land use and agriculture	11. Land Quality and Water Logging 11.1. Our soils comprise of Windsor Soil Type, seasonally wet deep clay, described as Slowly permeable seasonally waterlogged clayey soils with impeded drainage.	The Applicant confirms in ES Appendix 12.1 Agricultural land quality [APP-169] that slowly permeable clayey soil of the Windsor association is one of the most prevalent soil types within the Order Limits. The Outline Soil Resource Management Plan (SRMP), as contained in Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), acknowledges that the main adverse impacts

Reference	Theme	Issue raised	The Applicant's response
		11.2. The issue with taking 1/3 of our holding is the additional poaching damage my horse will do on the retained land. It will be impossible to graze during the winter. A hard based yard will need to be installed. 11.3. No work will be possible on the land for 4 to 5 months of the year, particularly when the topsoil has been stripped and the subsoils compacted with heavy machinery. There is insufficient information within the applicant's submission as to how they are going to deal with this issue. How they are going to stop soil erosion and water and sediment runoff to the local streams and ditches. 11.4. How can we the landowner stop the contactors if the ground conditions become detrimental to work in.	on soils during construction occur as a result of handling in inappropriate conditions, notably when the soils are too wet. Paragraphs B.9.1 to B.9.14 of the Outline SRMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) set out the methods for determining appropriate soil handling conditions and criteria for when soil handling may or may not take place, and specify that soil handling should only take place in suitable soil moisture and weather conditions. The Outline SRMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) also includes measures for soil handling, storage and reinstatement to minimise the risk of soil erosion and sediment runoff during construction and following reinstatement. In addition, the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), requires the preparation of a Construction Drainage Plan by the Contractor. This will be informed by pre-construction drainage surveys and will identify existing field drains and drainage features to ensure they are protected, maintained or appropriately reinstated. The Construction Drainage Plan will include measures to manage surface water, control sediment runoff, maintain drainage of surrounding land and minimise the risk of waterlogging during construction. The Outline SRMP provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) notes that reinstatement of soils over the pipeline will be undertaken as soon as practicable after installation, and that the timing and management of reinstatement will be agreed with the landowner. Disruption to agricultural land and its use for grazing will be minimised. Paragraph B.9.8 of the Outline SRMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) confirms that soil handling operations should be completed in time to enable a new vegetation cover to become established on reinstated land prior to the onset of winter. The Applicant recognises that temporary disruption to grazing activities and land management may occur during construction and reinstatement. Where the Project results in reasonable and substantiated losses, compensation may be paid in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.

Table 2-31 The Applicant's response to RR-160 from Ian Judd and Partners on behalf of Joe Platt

Reference	Theme	Issue raised	The Applicant's response
RR-160-1	Greeting	Please see email with Relevant Representation Relevant Representation Prepared on Behalf of Joe Platt & Maria Gozney In Relation to Hampshire Water Transfer and Water Recycling Project 1. Key Information	The Applicant notes this comment.

Reference	Theme	Issue raised	The Applicant's response
RR-160-2	Landowner engagement	Name & Address of Property Affected: Land at Scivers Lane, Lower Upham Land Plan Reference No: 21-003 - 5881m2 0.58ha - 1.38 acres Acquisition of Rights Linear length of pipe: 129m Use of Land: Private leisure and recreation, Small Holding. Interest Parties on my land: Owner Occupied Land Agent Instructed: Ian Judd and Partners, 4 High Street, Bishops Waltham, Southampton, Hampshire, SO32 1AB - 01489 896422 [REDACTED]@ianjuddandpartners.co.uk	The Applicant notes this comment.
RR-160-3	Principle of development	2. Summary of Submission 2.1. I wish to become an interested party and submit my strongest objection to this Development Consent Order Application.	The Applicant notes this comment.
RR-160-4	Principle of development	2.2. We accept the project but believe the scale of land taken is excessive and should be reduced to what is absolutely necessary for the scheme.	The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-160-5	Land use and agriculture	2.3. Our land is not suitable for laying a water pipe. It is very wet, with lots of trees and hedgerows and high value wet grassland.	The Applicant notes the concern regarding the suitability of the land for the Project, including the presence of wet ground conditions, trees, hedgerows and wet grassland habitats. These matters have been considered through the Environmental Impact Assessment and the relevant topic assessments. ES Chapter 12 Land use and agriculture [APP-091] confirms that a variety of soil types occur along the route, including slowly permeable and seasonally wet soils, and that appropriate soil management measures are incorporated into the Outline Soil Resources Management Plan (SRMP) appended to the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) to protect soil resources and support reinstatement following construction. ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) confirms that the Project has been designed to avoid, where reasonably practicable, priority habitats, ancient woodland, veteran trees and other sensitive ecological features. The design also seeks to utilise existing gaps in vegetation where practicable and includes reduced working widths and trenchless construction techniques in sensitive locations.

Reference	Theme	Issue raised	The Applicant's response
			ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) and the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) include measures to manage surface water runoff, maintain existing drainage functions and reduce the risk of sediment runoff and changes to local drainage patterns during construction. In addition, a Construction Drainage Plan will be prepared by the Contractor, once appointed, to manage the quality and quantity of construction stage drainage. Measures required to be included in the Construction Drainage Plan are set out in the main body of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). The Applicant therefore considers that the wet nature of the land, together with the presence of trees, hedgerows and wet grassland habitats, does not make the land unsuitable for the Project. These characteristics have informed the route design, construction methods and mitigation measures proposed.
RR-160-6	Landowner engagement	3. Summary of Land Use 3.1. We purchased this land in Spring 2026, a total of 3.24 acres (1.31 ha) of land at Scivers Lane, Lower Upham. The land is used as a small holding, used alongside my agricultural contracting business.	The Applicant notes this comment.
RR-160-7	Landowner engagement	4. Southern Waters Conduct to date 4.1. We have informed Southern Water we own this land, but not had any communication with them regarding the impact on our land.	The Applicant was seeking confirmation via the respondent's land agent that the landowner owns the property and can deduce title. This information was provided by the respondent's land agent on the 17 September 2026 and the Applicant is now seeking to engage further with the respondent now ownership has been proved. The Applicant has organised a site meeting with the respondent and their representative on 24 November 2026 to discuss their feedback further.
RR-160-8	The draft DCO	5. Need for Compulsory Purchase Powers 5.1. The Department for Communities and Local Government, Planning Act 2008, Guidance related to Procedures for the compulsory acquisition of land (CA Guidance), sets out the requirements Acquiring Authorities should meet to be granted CPO powers.	Please refer to the Applicant's responses to specific concerns raised about compulsory purchase in each of the entries below.
RR-160-9	Landowner engagement	5.2. Para 6. "provides that a development consent order may only authorise compulsory acquisition if the Secretary of State is satisfied that: - the land is required for the development to which the consent relates, or is required to facilitate, or is incidental to, the development,".	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO.

Reference	Theme	Issue raised	The Applicant's response
			Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance.
RR-160-10	Landowner engagement	5.3. Para 8. "The applicant will also need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate"	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance.
RR-160-11	Landowner engagement	5.4. Para 9. "The applicant must have a clear idea of how they intend to use the land which it is proposed to acquire.	The Applicant's proposed use of the land is set out in the Works Plans [APP-014] with detail of each Works Number set out in 'Schedule 1 – Authorised Development' to the Draft Development Consent [APP-023]. The respondent is affected by 'Works No.4 – Pipeline between the WRP site and Otterbourne WSW' for which the Applicant is seeking the acquisition of rights and temporary possession powers as set out on Sheet 16 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2).
RR-160-12	Landowner engagement	5.5. Para 11. Section 122 of the Planning Act sets out two conditions which must be met to the satisfaction of the Secretary of State before compulsory acquisition can be authorised. The first of these is related to the purpose for which compulsory acquisition is sought. These three purposes are set out in section 122(2): (i) the land is required for the development to which the development consent relates. For this to be met, the applicant should be able to demonstrate to the satisfaction of the Secretary of State that the land in question is needed for the development for which consent is sought. The Secretary of State will need to be satisfied that the land to be acquired is no more than is reasonably required for the purposes of the development. (ii) the land is required to facilitate or is incidental to the proposed development. An example might be the acquisition of land for the purposes of landscaping the project. In such a case the Secretary of State will need to be satisfied that the development could only be landscaped to a satisfactory standard if the land in question were to be compulsorily acquired, and that the land to be taken is no more than is reasonably necessary for that purpose, and that is proportionate.	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long

Reference	Theme	Issue raised	The Applicant's response
			period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-160-13	Location of the proposed pipeline routes	5.6. We believe that all of land included within the order limits is necessary to facilitate the scheme and the volume of land taken is not proportionate.	The Applicant has provided flexibility in the Order Limits, so that the Contractor can develop the design considering surveys and investigations prior to the commencement of construction. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project.
RR-160-14	Location of the proposed pipeline routes	5.7. The Acquiring Authority have not provided any justification for the scale/quantum of the Order Limits. They have stated (Para 3.3.3 Document Reference 4.1) that the maximum working width is 40m. Yet later (para 3.3.1 Document Reference 4.1- please note numbering error in document) the working width may be up to 50m.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m for a maximum length of 42m.
RR-160-15	Location of the proposed pipeline routes	5.8. We understand that Southern Water have chosen not to undertake detailed design and want an element of flexibility, this flexibility could be reduced to 20m in width. It is clear that the scale of the Order Limits is significantly more than is reasonably necessary or proportionate for a pipe that 0.8m in width.	The design of the Project as set out in the DCO application provides flexibility for refinement informed by further surveys and investigations at the detailed design stage. The detailed design will be developed following approval of the DCO application and the appointment of a Contractor. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs. The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). However, a 20m working width could not be used for the full extent of the Pipeline.

Reference	Theme	Issue raised	The Applicant's response
			In accordance with the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition have been met. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits, whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) sets out the maximum diameter of the pipelines for the different Project components, which may be greater than the 800mm referenced by the Respondent. The Applicant considers the permanent rights sought are justified in order to protect and preserve the integrity of the Project.
RR-160-16	Construction compound locations	5.9. We believe the Order Limits should be significantly reduced to a maximum of 20m. If the Acquiring Authority require greater area for unnecessary offsite storage, they can rent commercially available space off site.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). However, a 20m working width could not be used for the full extent of the Pipeline. If part of the required construction storage were to be located off-site, this would significantly increase the duration of construction works and the number of construction vehicle movements on the highway network. Both of these factors would result in adverse impacts on the environment and local communities.
RR-160-17	Location of the proposed pipeline routes	5.10. There is nothing within their submission that provides a justification for this excessive width of the order Limits.	The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-160-18	Location of the proposed pipeline routes	6. Scale of the Working Area 6.1. The justification for the working width is lacking any reality, below is an exact Graphic 3-3 Para 3.5.92 document Reference 6.1. [GRAPHIC]	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, which is secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide the necessary space for a haul road, construction working areas, material storage areas, pipeline trench and soil storage areas. This is set out at section 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. When intersecting

Reference	Theme	Issue raised	The Applicant's response
			sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m, over a distance of a maximum of 42m. The haul road/working area must be a sufficient width to allow a suitably sized excavator to track back at 90 degrees to the pipe to lift it and then lower into the trench. A suitably sized excavator capable of carrying out a tandem lift of a string of pipes would circa 11m long hence the 11m required. The working area for the trench excavation is calculated using the width of the excavator capable of pipeline installation (circa 3.5m) and a 2m deviation of the pipeline route in each direction without compromising the pipelaying process. If the pipeline has to change direction the joints are designed to allow a slight angle deviation to alter the direction this is a gradual process and requires sufficient space to allow for it. Therefore, a total of 7.5m. The pipe storage/jointing area must be wide enough to allow the pipes to be welded together to form the strings before lowering into the trench. As there will be welders working on this while the excavator is operating a 1m safety exclusion zone has to be in place. The total of the pipe storage/jointing area is therefore a total of 3.5m The area required for topsoil storage is based on topsoil being 200mm thick, which equates to 8m^3 for a 40m working width. With a side slope of 1:1 and maximum height of 1.8m an area of 7m has been allocated which includes for any bulking factor. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The area required for subsoil provides enough width in this area to segregate upper and lower subsoils, therefore there would be two separate mounds, which ensures the subsoil can be reinstated properly. A 1:1 side slope and a bulking factor has been incorporated which equates to 7m. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The above areas equate to a working width of 40m.
RR-160-19	Location of the proposed pipeline routes	6.2. This has a "Working Area and Haul Road" of 11m and a pipe trench 4m wide. This is excessive, yet only totals 15m in width. They want a further 25m for topsoil and subsoil storage.	Please refer to the Applicant's response to RR-160-18.
RR-160-20	Location of the proposed pipeline routes	6.3. I have undertaken a simple calculation of what may be needed as a working width - The Haul Road may be 3m wide, with occasional passing places,	Please refer to the Applicant's response to RR-160-18.

Reference	Theme	Issue raised	The Applicant's response
		- Working area 8m, this allows 6m of digger working area, plus 2m pipe storage - Pipe width - this will be 1.5m plus say 1.5m each side of pipe = 4.5m - Topsoil Storage - A fair estimate is to assume 150mm of top soil, across 20m equates to 3m³ of top soil, stacked at 1:2, say 2.5m x 1.25m = 3.75m3 ,therefore 2.5m for topsoil storage. - Sub-soil Storage - If the trench is 4m wide and assume a depth of 2m (2.15m below ground level) deep 7.5m³ of subsoil, again assume 1:2 stack equates to 4m of subsoil storage. - Excess 2m excess for fencing and other uses - Total working area required - 24m in width	
RR-160-21	Location of the proposed pipeline routes	6.4. It is completely unjustified, unreasonable and unnecessary for the purpose, and disproportionate to permit a working area greater than 24m in width for open cut sections of pipe	Please refer to the Applicant's response to RR-160-18.
RR-160-22	Landowner engagement	6.5. If Southern Water wish to use additional space this can be done by agreement at a market rent with individual landowners.	The Applicant has been seeking voluntary agreements for all land identified for temporary possession. Details of this engagement can be found within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1). As detailed within the Statement of Reasons [APP-025], temporary use possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the project. Whilst the Applicant's preference is to reach a voluntary agreement, it considers that the temporary possession powers sought within the DCO are necessary to ensure that the Project can be delivered where agreement cannot be reached. Reasonable losses incurred by landowners arising out of the temporary use of land will be reimbursed in line with the Compensation Code. The Applicant therefore considers that the temporary possession powers sought are justified and proportionate, whilst maintaining that a voluntary agreement remains its preferred outcome where possible.
RR-160-23	Location of the proposed pipeline routes	7. Scale of Easement Width 7.1. We haven't been provided any justification of the easement width restriction. Southern Water requested a 11m easement for open cut, being 5.5m each side of the pipe, with permanent restriction place on this land. Yet for tunnelled section the easement has been reduced to 2.5m each side of the pipe.	The purpose of the easement is to protect the integrity and operational requirements of the pipeline and to ensure appropriate access for inspection, maintenance, repair and replacement activities. The required width has been determined following a detailed technical assessment, taking account of the pipeline's diameter, depth, construction methodology, location and operational function.

Reference	Theme	Issue raised	The Applicant's response
			For sections of pipeline installed using open-cut construction, the Applicant is seeking an easement width of 11m (5.5m either side of the pipeline). This reflects the access and operational requirements associated with maintaining and, if necessary, excavating the pipeline in the future. Notably, this represents a reduction from the Applicant's published stand-off guidance for water mains of a comparable size and depth [1], which would typically require a wider protected corridor. This reduction from the normal requirement has been communicated to landowners and their agents where this is being challenged. For sections constructed using trenchless techniques, a reduced easement width is considered appropriate, taking into account depth, construction methodology and location. As the pipeline is installed at greater depth and future maintenance or operational access would be undertaken from either side of the trenchless section rather than directly above it, the same level of restriction is not required. The easement width has therefore been tailored to reflect the differing operational requirements of the construction methodologies. The Applicant is therefore satisfied that the easement widths proposed represent the minimum reasonably required to protect the pipeline and secure its safe operation over its lifetime.
RR-160-24	Location of the proposed pipeline routes	7.2. We have assessed other water providers easement width and the typical easement width for an 800mm pipe is 8m total width.	Please refer to the Applicant's response to RR-160-23.
RR-160-25	Location of the proposed pipeline routes	7.3. We have requested justification for this easement width; this hasn't been supplied. We therefore believe this is unreasonable, unjustified and disproportionate and should be reduced.	Please refer to the Applicant's response to RR-160-23.
RR-160-26	Landowner engagement	8. Private Negotiations and Alternative to Compulsory Purchase 8.1. We have yet to be issued any heads of terms.	The Applicant issued Heads of Terms on 6 March 2026 to the previous owners of land identified in plot 21-003 of the DCO. The Applicant was advised of a change in ownership by the respondent's representative on 6 July 2026. On the 13 of July 2026 the Applicant sought proof of ownership as the information on His Majesty's Land Registry does reflect the change of ownership. The respondent's representative confirmed on 13 July 2026 that this information was not available and so the Applicant did not issue updated Heads of Terms as the respondent could not deduce title. This information was subsequently provided by the respondent's land agent on the 17 September 2026 and the Applicant is now seeking to engage further with the respondent now ownership has been proved. The Applicant has organised a site meeting with the respondent and their representative on 24 November 2026 to discuss their feedback further.

Reference	Theme	Issue raised	The Applicant's response
RR-160-27	Construction impacts and effects	9. Land Quality 9.1. Our land is extremely wet. It is a bog in the winter months, completely inaccessible by machine or on foot.	The Applicant notes the landowner's comments regarding the characteristics of local soils and potential waterlogging. ES Appendix 12.1 Agricultural land quality [APP-169] identifies the Windsor soil association, comprising slowly permeable clayey soils with impeded drainage, as one of the most prevalent soil types within the Order Limits. Measures for the handling, storage and reinstatement of soils are set out within the Outline Soil Resource Management Plan (SRMP) contained in Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3).
RR-160-28	Water environment	9.2. The soils a deep clay. It is going to be impossible to access the land for many months of the year. The water table is very high, and any trenches will fill with water. We do not want water pumped onto our land. How will Southern Water deal with flooded trenches.	The Applicant acknowledges the Respondent's comments regarding the potential for flooded trenches on the land at Scivers Lane, Lower Upham. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) sets out measures that will be implemented to manage runoff and drainage at Scivers Lane during construction, including: • WE4: A Construction Drainage Plan will be prepared by the Contractor to manage the quality and quality of construction stage drainage. The Construction Drainage Plan will be produced and submitted for approval in accordance with the corresponding requirement for a CEMP in Schedule 2 to the draft Development Consent Order [APP-023]. This will incorporate measures to capture and attenuate surface runoff and ensure that there are no changes to off-site runoff rates and flood risk. The Construction Drainage Plan will be informed by surveys undertaken by a specialist drainage Contractor, to locate drains and create pre-construction drawings to ensure appropriate reinstatement. It will include measures to reduce water within the working area and ensure ongoing drainage of surrounding land. The plan will also set out a suitable methodology for the reinstatement of drainage systems impacted by pipeline installation, where appropriate. This will be informed by the pre-construction survey. In the event reinstating existing land drains is not feasible, a post construction drainage plan will be implemented. The purpose of the post- Construction Drainage Plan is to restore the soil structure and drainage status to at least the same condition as recorded prior to commencement of the construction works. The Flood Risk Assessment presented in Environmental Statement Appendix 19.1 Flood Risk Assessment [APP-189] concludes that the Pipeline is appropriate for its location, the proposals would appropriately manage flood risk during the construction phase, and would not result in an increase in off-site flood risk.
RR-160-29	Water environment	9.3. The whole of Scivers Lane is prone to flooding, the entire road was closed for a long period of last winter due to flooding, what precautions have been put in place to stop the working area from flooding.	Please refer to the Applicant's response to RR-160-28.
RR-160-30	Water environment	9.4. The pipeline will cross the stream/ditch in our land, which takes all the surface water from the adjacent development. In storm events the flow is vast,	Please refer to the Applicant's response to RR-160-28.

Reference	Theme	Issue raised	The Applicant's response
		any blockage or reduced in flow will result in flooding of my land and could flood the adjacent houses. How will this be dealt with by Southern Water.	
RR-160-31	Land use and agriculture	9.5. The volume of machinery and the wet soil conditions are going to cause significant long-term damage to my land. We need independent accurate pre entry soil and ground surveys before and after the works to be able to quantity any damage caused.	The Applicant acknowledges the respondent's concerns regarding the potential effects arising from construction activities in wet ground conditions. The likely effects on agricultural land and soils have been assessed within Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091] and appropriate mitigation measures are secured through the Outline Soil Resource Management Plan (SRMP) contained within Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). The Outline SRMP sets out measures for the management, handling, storage and reinstatement of soil resources, including controls on the timing of soil handling, the use of appropriate plant and equipment, soil stripping and storage methodologies, and reinstatement measures following construction. The Contractor will be required to prepare and implement detailed SRMP(s) in accordance with the Outline SRMP. The Outline SRMP details the appointment of an Agricultural Liaison Officer (ALO) for the duration of the construction works and up to one year post-construction. The roles of the ALO include the preparation of a Record of Condition to capture the condition of land prior to construction, and which will provide the comparison for reinstatement. Any defects identified and agreed between the landowner, ALO and the Contractor will be ameliorated by the Contractor. The ES Chapter 12 Land use and agriculture [APP-091] assessment concludes that, with these mitigation measures in place, temporary disruption to soils during construction would result in a neutral effect that is not significant. Land temporarily required for the works would be reinstated following construction in accordance with the detailed SRMP. Any claim for compensation arising from construction related impacts would be considered in accordance with the Compensation Code and assessed on the basis of reasonable and substantiated loss.
RR-160-32	Landscape and visual	10. Trees and Vegetation clearance 10.1. We are concerned by the volume of hedgerow to be removed on our roadside. This will result in long term loss of privacy. There is a mature oak tree in the hedgerow which should be avoided.	The tree impacts are assessed based on the worst case scenario within the ES Appendix 13.5 Arboricultural Impact Assessment [APP-175 to APP-176 - 2 documents], therefore the higher quality tree and hedgerows such as tree T735 are assumed to be lost but lower quality tree features at this location are assumed to be retained such as hedgerow H47. Where vegetation removal is unavoidable, it will be the intention of the detailed design to avoid high-quality category A trees (e.g. mature oak T735 in the hedgerow) as first priority, followed by moderate-quality category B (hedgerow H48 on the roadside) and low-quality category C trees, wherever practicable as set out in the Outline Construction Environmental Management Plan - 1 of 3 documents [APP-412]. Where the removal of trees (on land that would not contain above ground structures) during construction cannot be avoided, reinstatement planting will

Reference	Theme	Issue raised	The Applicant's response
			be undertaken. Loss of existing habitat and landscape features will be mitigated with replacement planting undertaken as close to the location of the existing vegetation as practicable as secured through the Outline Landscape and Ecology Management Plan [APP-420].
RR-160-33	Landscape and visual	10.2. The scheme will also impact the tress in the centre of our holding. These willows absorb a large amount of water, removing these trees will cause additional waterlogging.	As noted above, a worst case assessment has been undertaken which assumes that the willows will be removed. Where the removal of trees (on land that would not contain above ground structures) during construction cannot be avoided, reinstatement planting will be undertaken. Loss of existing habitat and landscape features will be mitigated with replacement planting undertaken as close to the location of the existing vegetation as practicable as secured through the Outline Landscape and Ecology Management Plan [APP-420]. Good construction practices are set out in the Outline CEMP [APP-412 to APP-414 - 3 documents]. A detailed Construction Environmental Management Plan(s) will be produced and submitted for approval in accordance with the corresponding requirement in Schedule 2 to the draft DCO. The Contractor will implement the Construction Drainage Plan measures to reduce the risk of flooding, as set out in WE4 and WE5 of Table 5-1 of the Outline CEMP.

Table 2-32 The Applicant's response to RR-162 from John C G Carling

Reference	Theme	Issue raised	The Applicant's response
RR-162-1	The process of developing the Project	Detail plans are not yet available, so it is difficult to comment at this stage.	The detailed design of the Project will not be developed until a Contractor has been appointed by the Applicant following granting of the DCO application. Therefore some level of flexibility has been provided in the design at the DCO application stage. This approach ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs. The Works Plans [AS-007, AS-008, APP-014] present the extent of the proposed works, as detailed in Schedule 1 to the draft Development Consent Order [APP-023] and ES Chapter 3 Description of the Proposed Development [APP-082]. The Applicant considers that the level of detail provided in these documents is sufficient to allow for interested parties to comment.
RR-162-2	Noise and vibration	However, noise from the plant is my primary concern as the recently installed similar plant is very noisy.	The construction and operational phase noise and vibration impacts of the Project have been assessed, as reported in ES Chapter 15 Noise and vibration [APP-094]. With reference to the Construction noise and vibration assessment, set out in ES Appendix 15.1 Construction noise and vibration assessment [APP-179], this dwelling is represented in the assessment by (R151 and R156) and will be mainly affected by construction noise associated with the shaft construction and micro tunnelling.

Reference	Theme	Issue raised	The Applicant's response
			As a minimum all construction noise impacts/effects would be mitigated through the implementation of Best Practicable Means (BPM) with additional noise and vibration mitigation measures where required. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) provides potential mitigation options, the final package of noise mitigation will be identified in a Noise and Vibration Management Plan to be submitted to the relevant local planning authority for approval prior to commencement of construction. The likely operational noise effects are assessed in ES Chapter 15 Noise and vibration [APP-094]. Table 15-41 therein shows that the unmitigated operational noise at R156, close to the Invasive Non-Native Species (INNS) Treatment at Otterbourne Water Supply Works (WSW), would result in moderate adverse effects, which with reference to ES Chapter 5 EIA approach and methodology [APP-084] are likely significant, requiring secondary mitigation. Note, with reference to paragraph 15.6.21 of in ES Chapter 15 Noise and vibration [APP-094], this is based on worst case assumption that *"…new building will be required and that this will be located at the closest point of the Limits of Deviation to the nearby receptors."* As likely significant effects are predicted at R156, secondary mitigation measures have been identified in ES Appendix 15.3 Operational noise assessment [APP-181], namely that the building fabric of the INNS Treatment plant building will need to be upgraded With this mitigation the potential for noise disturbance at R156 and neighbouring properties would be unlikely. The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) contains 'Site Specific Design Principles' (SSDPs) for the INNS Treatment at Otterbourne WSW relating to noise, which state: *"Detailed design will ensure that operational noise levels at noise sensitive receptors do not exceed the Lowest Observed Adverse Effect Level, as identified in ES Chapter 15 Noise and vibration. Mitigation measures will be adopted according to the following mitigation hierarchy:* • *Avoidance of noise and vibration* • *Control of noise and vibration at source* • *Implement good practice environmental noise management measures* • *Mitigate the propagation pathway, for example by introducing boundary screening"* These SSDPs provide a level of surety that the noise from operation of the Project will not adversely affect residential property or cause a loss of amenity.

Reference	Theme	Issue raised	The Applicant's response
RR-162-3	Design of AGP	The design of the plant should minimise the impact on neighbouring properties.	The Applicant notes this comment. The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) sets out the site-specific design principles of the Above Ground Plant (AGP), including considerations relating to noise, visual impacts and environmental mitigation.

Table 2-33 The Applicant's response to RR-165 from Ian Judd and Partners on behalf of John Paton

Reference	Theme	Issue raised	The Applicant's response
RR-165-1	Greeting	Please see supporting email with Relevant Representation Prepared on Behalf of John Paton In Relation to Hampshire Water Transfer and Water Recycling Project 1. Key Information Name of Interest party: Joh-n Paton Business Name: Fishers Pond Fishery Address: [REDACTED] Email Address: [REDACTED] Telephone Number: [REDACTED]	The Applicant notes this comment.
RR-165-2	Landowner engagement	Name & Address of Property Affected: Winchester Road Land Plan Reference No: 23-017 16,529m2 1.65ha 4.08 acres Temporary Possession 23-018 1829m2 0.18ha 0.44 acres Temporary Possession23-019 3403m2 0.34ha 0.84 acres Acquisition of Rights23-020 442m2 0.04ha 0.11 acres Temporary Possession23-021 46m2 0.004ha 0.01 acres Acquisition of RightsLinear length of pipe: 108m (Approx) Use of Land: Fishery- PasturelandInterest Parties on my land: Fishers Pond Fishery Land Agent Instructed: Ian Judd and Partners, 4 High Street, Bishops Waltham, Southampton, Hampshire, SO32 1AB - [REDACTED] [REDACTED]@ianjuddandpartners.co.uk	The Applicant notes this comment.
RR-165-3	Principle of development	2. Summary of Submission 2.1. I wish to become an interested party and submit my strongest objection to this Development Consent Order Application.	The Applicant notes this comment.
RR-165-4	Land use and agriculture	3. Summary of Land Use 3.1. I own a total of 13.24 acres (5.36 ha) of land at Fishers Pond. The land is part of my Fisheries business. In 2013 I obtain planning approval to use the	The Applicant notes this comment.

Reference	Theme	Issue raised	The Applicant's response
		land to create a commercial fishery pond for the rearing of fish, Winchester City Council Reference: 13/01566/FUL.	
RR-165-5	Land use and agriculture	3.2. This scheme will make it impossible to construct the pond as proposed, making the land unable for it intended purpose.	The Applicant notes the concern regarding the proposed pond and its intended use of the land. The planning permission referenced (13/01566/FUL) expired in October 2016 and has therefore not been implemented. The assessment presented in Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091] is based on the existing baseline land uses and conditions at the time of assessment and considers the likely significant effects of the Project on those existing uses.
RR-165-6	Water environment	3.3. Our water abstraction point is immediately adjacent to the order limits; we abstract water for our fishery's. I am concerned than if there is any pollution or sediment build up, this could impact the quality of the water and kill the fish. It would only take a small amount of pollution or deoxygenation of water to have a significant impact.	The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) sets out a series of measures that will be adopted by the Contractor to manage the risk of contaminating watercourses: • WE4 and WE5: Development of a Construction Drainage Plan to manage runoff and remove the risk of sediment entrainment. • WE6: Measures to manage contamination risks from construction activities. Environmental Statement (ES) Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) concludes that, on the basis of these mitigation measures, there will be no likely significant effects on the quality of surface or groundwaters or any abstractions from these waters. This includes abstractions at Fisher's Pond, which are considered alongside other groundwater receptors in Section L: Lower Upham to Brambridge in Table 19-56 of ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1).
RR-165-7	Design principles	4. Environmental Mitigation and Enhancement Area 4.1. A huge quantum of my land has been included an environmental mitigation area, yet detail of what this involves is unclear. We have not been consulted on this and it has never been discussed with us. Given that most of the land is temporary rights it is unclear what temporary environmental mitigation works they will be able to complete.	The Applicant wrote to the respondent and their land agent on 3 September 2026 to seek a meeting to discuss the Project proposals with them and the requirements for a voluntary agreement. The Applicant will continue to engage with the respondent and their land agent on this matter. As depicted on sheet 11 of the Environmental Mitigation and Enhancement Areas (EMEA) Plans (Appendix B of the Design Principles Document [APP-076]), this land is identified as EMEA-L-5. The corresponding Design Principle (reference EMEA-L-5) details the proposals at this location which in summary involve reinstatement and enhancement to the Fielders Farm Meadows SINC. Further information can be found in the Design Principles Document [APP-076].
RR-165-8	Landowner engagement	5. Southern Waters Conduct to date 5.1. We have been disappointed in Southern Waters conduct to date. There communication have been poor. They have not provided us an explanation of the works the propose to undertake on our land.	The Applicant does not recognise the accusations levelled at its approach to landowners. The Applicant has been in regular communication with the respondent's representative since issuing the Heads of Terms to the respondent on 6 March 2026, and the Applicant has organised a meeting with the respondent and their representative on 24 November 2026 to discuss their feedback further.

Reference	Theme	Issue raised	The Applicant's response
			The Applicant's proposed use of the land is set out in the Works Plans [APP-014] with detail of each Works Number set out in 'Schedule 1 – Authorised Development' to the Draft Development Consent Order [APP-023]. The respondent is affected by 'Works No.4 – Pipeline between the WRP site and Otterbourne WSW', 'Works No.6 – Construction Compounds' and 'Works No.7 - Environmental Mitigation and Enhancement Areas' for which the Applicant is seeking the acquisition of rights and temporary possession powers as set out in Sheet 23 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2).
RR-165-9	Consultation	5.2. We took part in the public consultation, yet our concerns have never been taken seriously and have never been addressed. The public consultations was just a formality that Southern Water gave lip-service to.	Section 47 of the PA 2008 is the duty of the Applicant to consult with the local community. The Consultation Report [APP-029] demonstrates conclusively that the Applicant has complied with the requirements of Section 47 of the PA 2008. This was also the view of all seven host local authorities when the Applicant consulted them in preparing the Adequacy of Consultation Milestone submission as part of the pre application procedure and subsequently confirmed through their Adequacy of Consultation Representations. The Planning Inspectorate concurred and the application has now been accepted. As well as undertaking statutory compliant consultations, the Applicant sought to carry out open, inclusive and proportionate pre-application consultation. The Applicant considered the Gunning Principles to make sure that consultation was fair, lawful and a worthwhile exercise for the Applicant and consultees, including landowners. Please see Table 3-1 in the Consultation Report [APP-029] for further detail about how the Applicant had regard to the Gunning Principles. Alongside formal consultation stages, the Applicant undertook ongoing engagement with landowners to inform refinements to the Project and the design of the AGP, WRP, and pipeline routes. The Applicant has had regard to all consultation feedback, which has informed the design of the Project. The Scheme Development Report [APP-073, APP-074, APP-075] and the Consultation Report [APP-029] set out the process that has been undertaken to design the Project and sets out how feedback from landowners and other stakeholders has been considered. Furthermore, following the Summer 2024 Consultation, the Statutory Consultations were largely focused on design changes that arose from considering feedback from landowners. The Applicant considered matters raised by landowners and reviewed whether alternative designs could mitigate these without introducing any new deliverability, environmental or land related risks or impacts. In the event that an alternative design would increase these risks or impacts, the alternative design may not have been progressed. A further meeting has been arranged with the respondent on 24th November 2026.

Reference	Theme	Issue raised	The Applicant's response
RR-165-10	Landowner engagement	6. Need for Compulsory Purchase Powers 6.1. The Department for Communities and Local Government, Planning Act 2008,Guidance related to Procedures for the compulsory acquisition of land (CA Guidance), sets out the requirements Acquiring Authorities should meet to be granted CPO powers.	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance.
RR-165-11	Landowner engagement	6.2. Para 6. 'provides that a development consent order may only authorise compulsory acquisition if the Secretary of State is satisfied that: - the land is required for the development to which the consent relates, or is required to facilitate, or is incidental to, the development,'.	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance.
RR-165-12	Landowner engagement	6.3. Para 8. 'The applicant will also need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate'	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance.
RR-165-13	Landowner engagement	6.4. Para 9. 'The applicant must have a clear idea of how they intend to use the land which it is proposed to acquire.	The Applicant's proposed use of the land is set out in the Works Plans (APP-014) with detail of each Works Number set out in 'Schedule 1 – Authorised Development' to the Draft Development Consent [APP-023].

Reference	Theme	Issue raised	The Applicant's response
			The respondent is affected by 'Works No.4 – Pipeline between the WRP site and Otterbourne WSW', 'Works No.6 – Construction Compounds' and 'Works No.7 - Environmental Mitigation and Enhancement Areas' for which the Applicant is seeking the acquisition of rights and temporary possession powers as set out in Sheet 23 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2).
RR-165-14	Landowner engagement	6.5. Para 11. Section 122 of the Planning Act sets out two conditions which must be met to the satisfaction of the Secretary of State before compulsory acquisition can be authorised. The first of these is related to the purpose for which compulsory acquisition is sought. These three purposes are set out in section 122(2): (i) the land is required for the development to which the development consent relates For this to be met, the applicant should be able to demonstrate to the satisfaction of the Secretary of State that the land in question is needed for the development for which consent is sought. The Secretary of State will need to be satisfied that the land to be acquired is no more than is reasonably required for the purposes of the development. (ii) the land is required to facilitate or is incidental to the proposed development. An example might be the acquisition of land for the purposes of landscaping the project. In such a case the Secretary of State will need to be satisfied that the development could only be landscaped to a satisfactory standard if the land in question were to be compulsorily acquired, and that the land to be taken is no more than is reasonably necessary for that purpose, and that is proportionate.	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-165-15	Location of the proposed pipeline routes	6.6. We believe that part the land included within the order limits is not necessary to facilitate the scheme and it volume of land taken is not proportionate.	The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project.
RR-165-16	Location of the proposed pipeline routes	6.7. On our property the order limits extending to 5.48 acres for 108 linear meters of pipe, which equates to an average of 205m in width, with a maximum width of around 238m.	The Project would use this land for installation of the Pipeline and a temporary trenchless construction compound to support trenchless construction under Winchester Road (B3354). The construction compound (Work No. 6) and Pipeline (Work No. 4) would be located to the west of the Respondent's land as shown on Sheet 23 of the Works Plans – 3 of 3 documents [APP-014]. The remainder of the land is proposed for environmental mitigation works, to compensate for the loss of habitat as a result of construction works, because this land is designated as the Fielders Farm Meadows (Eastleigh) Site of Importance for Nature Conservation (SINC).

Reference	Theme	Issue raised	The Applicant's response
RR-165-17	Location of the proposed pipeline routes	6.8. The Acquiring Authority have not provided any justification for the scale/quantum of the Order Limits. They have stated (Para 3.3.3 Document Reference 4.1) that the maximum working width is 40m. Yet later (para 3.3.1 Document Reference 4.1- please note numbering error in document) the working width may be up to 50m.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m for a maximum length of 42m.
RR-165-18	Location of the proposed pipeline routes	6.9. We understand that Southern Water have chosen not to undertake detailed design and want an element of flexibility this flexibility could be reduced to 20m in width. It is clear that the scale of the Order Limits significantly more than is reasonably necessary or proportionate for a pipe that 0.8m in width.	The design of the Project as set out in the DCO application provides flexibility for refinement informed by further surveys and investigations at the detailed design stage. The detailed design will be developed following approval of the DCO application and the appointment of a Contractor. This approach ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs. As this land would be used for a construction compound to support trenchless construction under Winchester Road (B3354), the land take in this location is dictated by the construction compound, instead of the typical pipeline construction working width. In accordance with the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition have been met. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits, whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) sets out the maximum diameter of the pipelines for the different Project components, which may be greater than the 800mm referenced by the Respondent. The Applicant considers the permanent rights sought are justified in order to protect and preserve the integrity of the Project.
RR-165-19	Location of the proposed pipeline routes	6.10. We believe the Order Limits should be significantly reduced to a maximum of 20m. If the Acquiring Authority require greater area for unnecessary offsite storage, they can rent commercially available space off site.	Please refer to the Applicant's response to RR-165-18. If part of the required construction storage were to be located off-site, this would significantly increase the duration of construction works and the number of construction vehicle movements on the highway network. Both of these factors would result in adverse impacts on the environment and local communities.

Reference	Theme	Issue raised	The Applicant's response
RR-165-20	Location of the proposed pipeline routes	6.11. There is nothing within their submission that provides a justification for this excessive width of the order Limits.	The Project would use this land for installation of the Pipeline and a temporary trenchless construction compound to support trenchless construction under Winchester Road (B3354). The construction compound (Work No. 6) and Pipeline (Work No. 4) would be located to the west of the Respondent's land as shown on Sheet 23 of the Works Plans – 3 of 3 documents [APP-014]. The remainder of the land is proposed for environmental mitigation works, to compensate for the loss of habitat as a result of construction works, because this land is designated as the Fielders Farm Meadows (Eastleigh) SINC. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-165-21	Location of the proposed pipeline routes	7. Scale of the Working Area 7.1. The justification for the working width is lacking any reality, below is an exact Graphic 3-3 Para 3.5.92 document Reference 6.1. [GRAPHIC]	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, which is secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide the necessary space for a haul road, construction working areas, material storage areas, pipeline trench and soil storage areas. This is set out at section 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) . Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m, over a distance of a maximum of 42m. The haul road/working area must be a sufficient width to allow a suitably sized excavator to track back at 90 degrees to the pipe to lift it and then lower into the trench. A suitably sized excavator capable of carrying out a tandem lift of a string of pipes would be circa 11m long hence the 11m required. The working area for the trench excavation is calculated using the width of the excavator capable of pipeline installation (circa 3.5m) and a 2m deviation of the pipeline route in each direction without compromising the pipelaying process. If the pipeline has to change direction the joints are designed to allow a slight angle deviation to alter the direction this is a gradual process and requires sufficient space to allow for it. Therefore, a total of 7.5m.

Reference	Theme	Issue raised	The Applicant's response
			The pipe storage/jointing area must be wide enough to allow the pipes to be welded together to form the strings before lowering into the trench. As there will be welders working on this while the excavator is operating a 1m safety exclusion zone has to be in place. The total of the pipe storage/jointing area is therefore a total of 3.5m The area required for topsoil storage is based on topsoil being 200mm thick, which equates to 8m^3 for a 40m working width. With a side slope of 1:1 and maximum height of 1.8m an area of 7m has been allocated which includes for any bulking factor. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The area required for subsoil provides enough width in this area to segregate upper and lower subsoils, therefore there would be two separate mounds, which ensures the subsoil can be reinstated properly. A 1:1 side slope and a bulking factor has been incorporated which equates to 7m. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The above areas equate to a working width of 40m.
RR-165-22	Location of the proposed pipeline routes	7.2. This has a 'Working Area and Haul Road' of 11m and a pipe trench 4m wide. This is excessive, yet only totals 15m in width. They want a further 25m for topsoil and subsoil storage.	Please refer to the Applicant's response to RR-165-21.
RR-165-23	Location of the proposed pipeline routes	7.3. I have undertaken a simple calculation of what may be needed as a working width - The Haul Road may be 3m wide, with occasional passing places, - Working area 8m, this allows 6m of digger working area, plus 2m pipe storage - Pipe width - this will be 1.5m plus say 1.5m each side of pipe = 4.5m - Topsoil Storage - A fair estimate is assume 150mm of top soil, across 20m equates to 3m³of top soil, stacked at 1:2, say 2.5m x 1.25m = 3.75m³, therefore 2.5m for topsoil storage. - Sub-soil Storage - If the trench is 4 wide and assume a depth of 2m (2.15m below ground level) deep 7.5m³ of subsoil, again assume 1:2 stack equates to 4m of subsoil storage. - Excess 2m excess for fencing and other uses - Total working area required - 24m in width	Please refer to the Applicant's response to RR-165-21.
RR-165-24	Location of the proposed pipeline routes	7.4. It is completely unjustified, unreasonably, unnecessary for the purpose, and disproportionate to permit a working area greater than 24m in width for open cut sections of pipe	Please refer to the Applicant's response to RR-165-21.

Reference	Theme	Issue raised	The Applicant's response
RR-165-25	Landowner engagement	7.5. If Southern Water wish to be use additional space this can be done by agreement at a market rent with individual landowners.	The Applicant has been seeking voluntary agreements for all land identified for temporary possession. Details of this engagement can be found within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1). As detailed within the Statement of Reasons [APP-025], temporary use possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the project. Whilst the Applicant's preference is to reach a voluntary agreement, it considers that the temporary possession powers sought within the DCO are necessary to ensure that the Project can be delivered where agreement cannot be reached. Reasonable losses incurred by landowners arising out of the temporary use of land will be reimbursed in line with the Compensation Code. The Applicant therefore considers that the temporary possession powers sought are justified and proportionate, whilst maintaining that a voluntary agreement remains its preferred outcome where possible.
RR-165-26	Location of the proposed pipeline routes	8. Scale of Easement Width 8.1. We haven't been provided any justification of the easement width restriction. Southern Water requested a 11m easement for open cut , being 5.5m each side of the pipe, with permanent restriction place on this land. Yet for tunnelled section the easement has been reduced to 2.5m each side of the pipe.	The purpose of the easement is to protect the integrity and operational requirements of the pipeline and to ensure appropriate access for inspection, maintenance, repair and replacement activities. The required width has been determined following a detailed technical assessment, taking account of the pipeline's diameter, depth, construction methodology, location and operational function. For sections of pipeline installed using open-cut construction, the Applicant is seeking an easement width of 11m (5.5m either side of the pipeline). This reflects the access and operational requirements associated with maintaining and, if necessary, excavating the pipeline in the future. Notably, this represents a reduction from the Applicant's published stand-off guidance for water mains of a comparable size and depth [1], which would typically require a wider protected corridor. This reduction from the normal requirement has been communicated to landowners and their agents where this is being challenged. For sections constructed using trenchless techniques, a reduced easement width is considered appropriate, taking into account depth, construction methodology and location. As the pipeline is installed at greater depth and future maintenance or operational access would be undertaken from either side of the trenchless section rather than directly above it, the same level of restriction is not required. The easement width has therefore been tailored to reflect the differing operational requirements of the construction methodologies.

Reference	Theme	Issue raised	The Applicant's response
			The Applicant is therefore satisfied that the easement widths proposed represent the minimum reasonably required to protect the pipeline and secure its safe operation over its lifetime.
RR-165-27	Location of the proposed pipeline routes	8.2. We have assessed other water providers easement width and the typical easement width for an 800mm pipe is 8m total width.	Please refer to the Applicant's response to RR-165-26.
RR-165-28	Location of the proposed pipeline routes	8.3. We have requested justification for this easement width; this hasn't been supplied. We therefore believe this is unreasonable, unjustified and disproportionate and should be reduced.	Please refer to the Applicant's response to RR-165-26.
RR-165-29	Construction compound locations	9. Scale of Compounds 9.1. 1829m² is to be used a compound. We cannot find any justification for this compound, what it is used for or why it is needed beyond the permanent rights.	Graphic 3-12 in ES Chapter 3 [APP-082] provides an indicative plan of a typical trenchless launch and reception shaft compound. This shows that land will be required for material and pipe shortage, shafts and cabins. The empty areas within these indicative plans are required so for working areas and so construction vehicles and plant can manoeuvre efficiently and safely.
RR-165-30	Landowner engagement	10. Private Negotiations and Alternative to Compulsory Purchase 10.1. At no point have Southern Water met with me to discuss the private agreement. They keep sending letters, but haven't yet arrange a meeting to discuss private terms.	Following the Heads of Terms being issued on 6 March 2026 the Applicant discussed the Heads of Terms with the respondent's representative at a meeting on 13 May 2026. Following this, the Applicant requested a further meeting on 17 July 2026 and, after issuing a letter proposing revised Heads of Terms on 7 August 2026 incorporating amended provisions and improved commercial terms, sought an additional meeting with the respondent's agent on 11 September 2026, evidencing the Applicant's attempts to reach a voluntary agreement. The respondent's representative confirmed on 11 September 2026 that the respondent would like a meeting and the Applicant has organised a meeting with the respondent and their representative on 24 November 2026 to discuss their feedback further.
RR-165-31	Landowner engagement	10.2. I believe it is disingenuous to categorize me as 'Head of Terms negotiation on-going' (yellow status). This is not true, Southern Water have made no effort to reach an agreement with us. I request that my status is amended to 'Heads of Terms agreements unlikely before close of examination (red)'.	The Applicant considers that the status recorded for the respondent by the Applicant, in the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1) is correct given that Heads of Terms for a voluntary agreement have been issued and continue to be discussed with the respondent's representative. The Applicant's efforts to reach a voluntary agreement have been outlined in RR-165-30.
RR-165-32	Land use and agriculture	11. Land Quality and Water Logging 11.1. The soils are Windsor, a seasonally wet deep clay. The soils are Slowly permeable seasonally waterlogged clayey soils mostly with brown subsoils and impeded drainage. The land is VERY WET. Our intended us a pond, due to its wetness.	The Applicant notes the concern regarding the wet and poorly drained nature of the soils at this location. ES Chapter 12 Land use and agriculture [APP-091] confirms that soils of the Windsor association, comprising slowly permeable and seasonally waterlogged clayey soils, are present across parts of the Order Limits and are a recognised characteristic of the local baseline. The presence of these soil conditions has been taken into account in the design and assessment of the Project. ES Chapter 12 Land use and

Reference	Theme	Issue raised	The Applicant's response
			agriculture [APP-091] confirms that soil sampling has been undertaken to identify soil types and agricultural land classifications along the route, and that the construction methodology incorporates appropriate soil management measures through the Outline Soil Resources Management Plan (SRMP) Appendix B of Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). The Applicant does not consider that the presence of seasonally wet and poorly drained clay soils makes the land unsuitable for the Project. Rather, these conditions are recognised as part of the baseline environment and have informed the construction methods and mitigation measures proposed, including controls on soil handling, drainage management and reinstatement. In addition, the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) requires the preparation of a Construction Drainage Plan to manage construction drainage, maintain existing drainage functions and minimise risks associated with waterlogging and surface water runoff during construction.
RR-165-33	Construction impacts and effects	11.2. Our land can be inaccessible for 9 months of the year- September to May wouldn't take a tractor onto our land in these month, as they will get stuck.	The Applicant notes the landowner's comments regarding the characteristics of local soils and potential waterlogging. ES Appendix 12.1 Agricultural land quality [APP-169] identifies the Windsor soil association, comprising slowly permeable clayey soils with impeded drainage, as one of the most prevalent soil types within the Order Limits. Measures for the handling, storage and reinstatement of soils are set out within the Outline Soil Resource Management Plan (SRMP) contained in Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3).
RR-165-34	Construction impacts and effects	11.3. The drop from the public highway to the land is steep. It will be impossible to access the land when ground conditions are wet.	Please refer to the Applicant's response to RR-165-33 regarding ground conditions when wet. With regards to access, the Framework Construction Traffic Management Plan (CTMP) [APP-415] included indicative designs of all temporary accesses to the temporary construction compounds and a standard detail for haul road crossings with the public highway. The detailed design of these accesses would be prepared in a future design stage, would be informed by additional survey information and would be subject to prior approval from the relevant highway authority. Construction compound L-5, proposed on land plot 23-017, would be accessed via the haul road and an access on to Winchester Road further south (via land plot 23-006). No direct access from Winchester Road on to land plot 23-017 is proposed.
RR-165-35	Construction impacts and effects	11.4. We believe it will be impossible to work on the land outside May-end August, particularly when the topsoil has been stripped and the subsoils compacted with heavy machinery. There is insufficient information within the applicant's submission as how they are going to deal with this issue. How they	The Applicant notes the landowner's comments regarding the characteristics of local soils and potential waterlogging. ES Appendix 12.1 Agricultural land quality [APP-169] identifies the Windsor soil association, comprising slowly permeable clayey soils with impeded drainage, as one of the most prevalent soil types within the Order Limits. Measures for the handling, storage and

Reference	Theme	Issue raised	The Applicant's response
		are going to stop soil erosion and water and sediment runoff to the local streams and ditches.	reinstatement of soils are set out within the Outline Soil Resource Management Plan (SRMP) contained in Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). Good construction practices set out in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), which is secured by a requirement in the DCO, will manage the effects of construction. The mitigation measures set out in the Outline CEMP will be carried forward and developed into detailed CEMP(s), which will be produced by the Contractor prior to the commencement of construction of the Project.
RR-165-36	Construction impacts and effects	11.5. This land is a bog and not suitable for the construction proposed.	Please refer to the Applicant's response to RR-165-35.

Table 2-34 The Applicant's response to RR-180 from Kate Blyth

Reference	Theme	Issue raised	The Applicant's response
RR-180-1	Landowner engagement	We live in housing very close to the project and have just received a letter from our mortgage provider about it. I need to track what exactly the plans are for our section.	The Applicant has identified the respondent as a potential Category 3 interest within the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1). The respondent can find details on the types of works to be undertaken in the vicinity of their property on Sheet 25 in the Works Plans [APP-014]. The works are located in a field north of her property and comprise 'Work No.4 – Pipeline between the WRP site and Otterbourne WSW' and 'Work No.6 – Construction Compound'. A description of what these Works Numbers comprise can be found in 'Schedule 1 – Authorised Development' to the Draft Development Consent Order [APP-023].
RR-180-2	Landowner engagement	Although generally I am in favour of this, I need to know the implications for my family's security and safety.	Please see response above. As the respondent is a Category 3 interest within the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1), they do not own or occupy land directly affected by the Project. However, the Applicant confirms that security and safety measures are secured through the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and will be considered further as part of the detailed design process following consent.

Table 2-35 The Applicant's response to RR-183 from Katie Ruth Anderson and RR-314 Stephen Mark Anderson

Reference	Theme	Issue raised	The Applicant's response
RR-183-1	Landowner engagement	We are awaiting responses from Southern Water's representatives concerning the impact that this will have on our property and the appropriateness of the compensation and protections offered.	The Applicant responded via email to the respondents' queries regarding the impacts to their property on 9th September 2026. The Applicant has further responded to each of the respondent's concerns in the responses below.
RR-183-2	Landowner engagement	These include questions about the potential impact on our lives to due the location of our house, proximity of access points, impact on house value and cost/availability of insurance, the reference points for depth measurements, uncertainty as to the precise area the tunnel will affect, the value of compensation, the low level of money provided for legal costs, how we recover the cost of a land agent and the precise legal documentation that Southern Water will seek.	The Applicant confirms the following in relation to these responses: 1. The respondents can find details on the types of works to be undertaken in the vicinity of their property on Sheet 5 in the Works Plans [AS-008]. A description of what Works No.4 comprises of can be found in 'Schedule 1 – Authorised Development' to the Draft Development Consent Order [APP-023]. 2. The Applicant confirms there are no proposed tunnel access points, launch shafts or reception shafts on or immediately adjacent to the respondent's property. 3. Given the depth of the proposed tunnel, the Applicant does not anticipate the respondents will encounter difficulties obtaining insurance or a mortgage on the property. The Applicant confirms that compensation will be paid for any reasonable and substantiated losses arising as a result of construction and operational works in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss. 4. The respondents' concerns regarding design uncertainty are acknowledged. Detailed design of the Project, including depth measurements and tunnel area will be developed as a post-consent activity and subject to approval by the relevant authority. Prior to undertaking detailed design, it is not possible for the Applicant to confirm the precise area of land required as outlined in the Statement of Reasons [APP-025]. The Applicant is committed to keeping landowners informed as the design evolves and will provide clarity on land use requirements as soon as practicable). The Applicant is committed to keeping landowners informed as the design evolves and will provide clarity on land use requirements as soon as practicable. 5. The Applicant confirms that the practice of adopting a fixed value compensation scheme has been used by other major infrastructure projects where tunnelling rights within subsoil were acquired. The Applicant confirms acceptance of the compensation offered is not mandatory, and the respondents will be able to follow the statutory process for agreeing compensation should they consider their losses to be higher than the amount offered. The Applicant also confirms that compensation may be paid for reasonable and substantiated losses arising as a result of construction works and operation of the pipeline and tunnel in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.

Reference	Theme	Issue raised	The Applicant's response
			6. The Applicant wrote to the respondents on 19th May 2026 setting out the basis on which it would contribute towards the respondent's professional fees. 7. As outlined in the Statement of Reasons [APP-025] the Applicant intends to exercise the powers of compulsory acquisition instead of entering into a voluntary agreement with the respondents. This approach ensures that landowners are not required to enter into option agreements or deal with any administrative burdens in respect of their residential properties until the exact route of the pipeline is known. The Applicant wrote to the respondents on 19th May 2026 confirming this approach. the Applicant intends to exercise the powers of compulsory acquisition instead of entering into a voluntary agreement with the respondents. This approach ensures that landowners are not required to enter into option agreements or deal with any administrative burdens in respect of their residential properties until the exact route of the pipeline is known. The Applicant wrote to the respondents on 19th May 2026 confirming this approach.
RR-183-3	Landowner engagement	This is not a comprehensive/exhaustive list of my questions.	The Applicant welcomes any further queries the respondent has.
RR-183-4	Landowner engagement	At this stage there are so many unknowns that we do not feel comfortable accepting the offer made by Southern Water and wish to make representations going forward.	The Applicant wrote to the respondents on 21 May 2026 confirming that the respondents' land will be impacted by the Project. This correspondence confirmed the proposed recognition payment for the rights sought through the DCO. The Applicant confirms that the respondents may follow the statutory process for agreeing compensation in accordance with the compensation code if the consideration is not accepted. The Applicant acknowledges the respondents' wishes to make representations going forward.

Table 2-36 The Applicant's response to RR-186 from Laura Cooper

Reference	Theme	Issue raised	The Applicant's response
RR-186-1	Landowner engagement	(Redacted) is grazing land 365 days a year. The land is owned by Portsmouth CC. I am the (redacted).	The Applicant notes this comment.
RR-186-2	Landowner engagement	I am concerned that the access from Farlington Avenue will be blocked. This is the ONLY access to the fields in constant use.	The Applicant confirms that surface works will be avoided at Farlington Avenue and no accesses will be blocked, as outlined in the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). The Applicant will be using a tunnelled construction methodology at the location referenced by the respondent, as detailed in ES Chapter 3 Description of the Proposed Development [APP-082] and shown on Sheet 5 and Sheet 6 of the Works Plans [AS-007].

Reference	Theme	Issue raised	The Applicant's response
			The Applicant has also made a specific commitment relating to maintaining access for landowners where reasonably practicable, which will be secured through the DCO and associated management plans. This measure is outlined in the Commitments Register (ES Appendix 5.5) [APP-108] reference Mit-GT 248.

Table 2-37 The Applicant's response to RR-187 from Ian Judd and Partners on behalf of Laurence Trevor Hamblen

Reference	Theme	Issue raised	The Applicant's response
RR-187-1	Greeting	please see emailed relevant representation 1. Key Information Name of Interest party: [REDACTED] Business Name: L Hamblen Address: The Old Barn, Forest Lane, Fareham, Hampshire, PO17 5DW Email Address: [REDACTED]@live.co.uk Telephone Number: [REDACTED]	The Applicant notes this comment.
RR-187-2	Landowner engagement	Name & Address of Property Affected: Castle Farm Lane Land Plan Reference No: 12-017 13-001 Area of Acquisition Rights requested: 15709 square metres 132 square metres Linear length of pipe: 318 Use of Land: Arable Production Interest Parties on my land: L Hamblen- Messrs L T Hamblen and Mr J Hamblen Land Agent Instructed: Ian Judd and Partners, 4 High Street, Bishops Waltham, Southampton, Hampshire, SO32 1AB - 01489 896422 [REDACTED]@ianjuddandpartners.co.uk	The Applicant notes this comment.
RR-187-3	Principle of development	2. Summary of Submission 2.1. I wish to become an interested party and submit my strongest objection to this Development Consent Order Application.	The Applicant notes this comment.

Reference	Theme	Issue raised	The Applicant's response
RR-187-4	Land use and agriculture	3. Summary of Land Use 3.1. I own, with my brother and sister, around 124 ha. I farm in partnership with my son, trading as L Hamblen. The land is all in arable production or environmental schemes.	The Applicant notes the information provided regarding the ownership and agricultural use of the landholding. Information provided by landowners and occupiers has informed the assessment of agricultural land and farm holdings reported in Section 12.8 of ES Chapter 12 Land use and agriculture [APP-091]. The assessment considers the likely effects of the Project on agricultural land use and farm holdings, including the temporary use of land during construction and any permanent land requirements associated with the Project. It also considers impacts on agricultural operations, including access, boundary features, drainage systems and field severance, where relevant. The assessment has been informed by engagement with landowners and occupiers to understand the extent and nature of individual landholdings and land use activities and the likely effects of the Project on those holdings.
RR-187-5	Land use and agriculture	4. Impact on Business 4.1. We are arable farmers, with farming being my main source of income. Over the years our farm area has been reduced for various reasons. Our holding is now modest in scale compared with many arable enterprises. The loss of this field will have an impact on the business. 4.2. The greater concern is ensuring that the land is reinstated. Whilst I have read Southern Water's policy for reinstating land, we need a legal guarantee that it is done properly.	The Applicant acknowledges the concern regarding the potential effect of temporary land occupation on the agricultural business and the need for appropriate reinstatement of land following construction. Reasonable losses to landowners arising out of the temporary use of land will be reimbursed in line with the Compensation Code. In response to 4.2, the Outline Soil Resources Management Plan (SRMP), which is provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), notes that reinstatement of soils over the pipeline will be undertaken as soon as practicable after installation, and that the timing and management of reinstatement will be agreed with the landowner. The Outline SRMP also includes requirements relating to soil handling, storage, reinstatement and remediation of defects identified following reinstatement. The CEMP, and therefore the SRMP, is secured by Requirement 6 of Schedule 2 to the Draft DCO [APP-023], which notes that the detailed CEMP must be in substantial accordance with the Outline CEMP. The Applicant therefore considers that an appropriate and enforceable framework is in place to secure the reinstatement of agricultural land following construction.

Reference	Theme	Issue raised	The Applicant's response
RR-187-6	Land use and agriculture	4.3. We have asked for a very detailed record of condition to include soil profiling, detailed soil analysis and drainage analysis. This has been refused by Southern Water to date. I don't think this is unreasonable that this should be undertaken by an independent expert, funded by Southern Water before and after the works. To have a qualifiable baseline of soil quality and health.	The Applicant acknowledges the request for detailed soil profiling, soil analysis and drainage information in relation to the affected landholding. Environmental Statement (ES) Appendix 12.1 Agricultural Land Quality [APP-169] identifies and characterises seven soil types throughout the Order Limits based on the analysis of 90 soil samples. Due to the temporary, short-term and very localised nature of disturbance to soils for the installation of the pipeline, a detailed pre-construction survey was not undertaken. However, the Outline Soil Resources Management Plan (SRMP) provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) notes at paragraph B.2.16 that the Agricultural Liaison Officer (ALO) will be responsible for undertaking and preparing a Record of Condition to capture the condition of the land prior to commencement of construction. The Applicant therefore considers that an appropriate baseline has been established through the agricultural land quality assessment and that measures are in place to record pre-construction land conditions and support the reinstatement of affected land following construction.
RR-187-7	Landowner engagement	5. Southern Waters Conduct to date 5.1. We have been disappointed in Southern Waters conduct to date. They are working against landowners. They would save time and money if they started to work with us. This would take a significant attitude and personnel change within Southern Water.	The Applicant does not recognise the accusations levelled at its approach to landowners. The Applicant remains committed to working collaboratively with landowners and disagrees with respondent's suggestion that they have been working against landowners. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with landowners regarding a voluntary agreement. The Applicant will continue to engage with the respondent in an attempt to secure a voluntary agreement. The Applicant most recently met with the respondent and their representative 17 November 2026 to discuss Heads of Terms and the scheme generally.
RR-187-8	Consultation	5.2. We took part in the public consultation in 2024 & 2025, yet our concerns have never been taken seriously and have never been addressed. The public consultations was just a formality that Southern Water gave lip-service to.	Section 47 of the PA 2008 is the duty of the Applicant to consult with the local community. The Consultation Report [APP-029] demonstrates conclusively that the Applicant has complied with the requirements of Section 47 of the PA 2008. This was also the view of all seven host local authorities when the Applicant consulted them in preparing the Adequacy of Consultation Milestone submission as part of the pre application procedure and subsequently confirmed through their Adequacy of Consultation Representations. The Planning Inspectorate concurred and the application has now been accepted. As well as undertaking statutory compliant consultations, the Applicant sought to carry out open, inclusive and proportionate pre-application consultation. The Applicant considered the Gunning Principles to make sure that consultation

Reference	Theme	Issue raised	The Applicant's response
			was fair, lawful and a worthwhile exercise for the Applicant and consultees, including landowners. Please see table 3-1 in the Consultation Report [APP-029] for further detail about how the Applicant had regard to the Gunning Principles. Alongside formal consultation stages, the Applicant undertook ongoing engagement with landowners to inform refinements to the Project and the design of the AGP, WRP, and pipeline routes. Please refer to the Statement of Engagement [APP-072] for more information. The Applicant has had regard to all feedback, which has informed the design of the Project. The Scheme Development Report [APP-073, APP-074, APP-075] and the Consultation Report [APP-029] set out the process that has been undertaken to design the Project and sets out how feedback from landowners and other stakeholders has been considered. Furthermore, following the Summer 2024 Consultation, the statutory consultations were largely focused on design changes that arose from considering feedback from landowners. The Applicant considered matters raised by landowners and reviewed whether alternative designs could mitigate these without introducing any new deliverability, environmental or land related risks or impacts. In the event that an alternative design would increase these risks or impacts, the alternative design may not have been progressed. The Applicant most recently met with the respondent and their representative on 17 November 2026 to discuss Heads of Terms and the scheme generally.
RR-187-9	Landowner engagement	5.3. The constant threat of court and legal action, compulsory purchase and fines is unneeded. If the Examining Authority and Sectary of state deem this project requires CPO powers, we landowners are unable to stop this scheme, however I feel that Southern Water have abused their powers to date.	During discussions with landowners, the Applicant has acted responsibly in making landowners aware of the statutory alternatives available should voluntary agreements not be reached. In relation to surveys, the use of statutory powers under Section 172 of the Housing and Planning Act 2016 has been referenced in correspondence to ensure the respondent is aware of the statutory powers available but confirms that these would only be relied upon following reasonable attempts to secure access by voluntary agreement. The Applicant does not recognise the accusations levelled regarding use of its statutory powers.
RR-187-10	Landowner engagement	6. Need for Compulsory Purchase Powers 6.1. The Department for Communities and Local Government, Planning Act 2008, Guidance related to Procedures for the compulsory acquisition of land (CA Guidance), sets out the requirements Acquiring Authorities should meet to be granted CPO powers. 6.2. Para 6. "provides that a development consent order may only authorise compulsory acquisition if the Secretary of State is satisfied that: - the land is required for the development to which the consent relates, or is required to facilitate, or is incidental to, the development,".	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance.

Reference	Theme	Issue raised	The Applicant's response
		6.3. Para 8. "The applicant will also need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate"	
RR-187-11	Landowner engagement	6.4. Para 9. "The applicant must have a clear idea of how they intend to use the land which it is proposed to acquire. 6.5. Para 11. Section 122 of the Planning Act sets out two conditions which must be met to the satisfaction of the Secretary of State before compulsory acquisition can be authorised. The first of these is related to the purpose for which compulsory acquisition is sought. These three purposes are set out in section 122(2): (i) the land is required for the development to which the development consent relates. For this to be met, the applicant should be able to demonstrate to the satisfaction of the Secretary of State that the land in question is needed for the development for which consent is sought. The Secretary of State will need to be satisfied that the land to be acquired is no more than is reasonably required for the purposes of the development. (ii) the land is required to facilitate or is incidental to the proposed development. An example might be the acquisition of land for the purposes of landscaping the project. In such a case the Secretary of State will need to be satisfied that the development could only be landscaped to a satisfactory standard if the land in question were to be compulsorily acquired, and that the land to be taken is no more than is reasonably necessary for that purpose, and that is proportionate.	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance. As detailed within the Statement of Reasons [APP-025], temporary possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the project. The Applicant's proposed use of the land is set out in the Works Plans (APP-013) with detail of each Works Number set out in 'Schedule 1 – Authorised Development' to the Draft Development Consent Order [APP-023]. The respondent is affected by 'Works No.4 – Pipeline between the WRP site and Otterbourne WSW' for which the Applicant is seeking the acquisition of rights as set out in Sheet 13 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2).
RR-187-12	Location of the proposed pipeline routes	6.6. We believe that part of the land included within the order limits is not necessary to facilitate the scheme and the volume of land taken is not proportionate. 6.7. The Acquiring Authority have not provided any justification for the scale/quantum of the Order Limits. They have stated (Para 3.3.3 Document Reference 4.1) that the maximum working width is 40m. Yet later (para 3.3.1 Document Reference 4.1- please note numbering error in document) the working width may be up to 50m. 6.8. We understand that Southern Water have chosen not to undertake detailed design and want an element of flexibility, this flexibility could be reduced to 20m in width. It is clear that the scale of the Order Limits significantly more than is reasonably necessary or proportionate for a pipe that 1.4m in width.	The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The design of the Project as set out in the DCO application provides flexibility for refinement informed by further surveys and investigations at the detailed design stage. The detailed design will be developed following approval of the DCO application and the appointment of a Contractor. This approach ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.

Reference	Theme	Issue raised	The Applicant's response
			The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m for a maximum length of 42m.
RR-187-13	Location of the proposed pipeline routes	6.9. We believe the Order Limits should be significantly reduced to a maximum of 20m. If the Acquiring Authority require greater area for unnecessary offsite storage, they can rent commercially available space off site. 6.10. There is nothing within their submission that provides a justification for this excessive width of the order Limits.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide the necessary space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas, and enable safe and efficient construction operations. This is set out at section 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. If part of the required construction storage were to be located off-site, this would significantly increase the duration of construction works and the number of construction vehicle movements on the highway network. Both of these factors would result in adverse impacts on the environment and local communities.
RR-187-14	Location of the proposed pipeline routes	7. Scale of the Working Area 7.1. The justification for the working width is lacking any reality, below is an exact Graphic 3-3 Para 3.5.92 document Reference 6.1.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, which is secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide the necessary space for a haul road, construction working areas, material storage areas, pipeline trench and soil storage areas. This is set out at section 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m, over a distance of a maximum of 42m. The haul road/working area must be a sufficient width to allow a suitably sized excavator to track back at 90 degrees to the pipe to lift it and then lower into the trench. A suitably sized excavator capable of carrying out a tandem lift of a string of pipes would circa 11m long hence the 11m required.

Reference	Theme	Issue raised	The Applicant's response
			The working area for the trench excavation is calculated using the width of the excavator capable of pipeline installation (circa 3.5m) and a 2m deviation of the pipeline route in each direction without compromising the pipelaying process. If the pipeline has to change direction the joints are designed to allow a slight angle deviation to alter the direction this is a gradual process and requires sufficient space to allow for it. Therefore, a total of 7.5m. The pipe storage/jointing area must be wide enough to allow the pipes to be welded together to form the strings before lowering into the trench. As there will be welders working on this while the excavator is operating a 1m safety exclusion zone has to be in place. The total of the pipe storage/jointing area is therefore a total of 3.5m The area required for topsoil storage is based on topsoil being 200mm thick, which equates to $8m^3$ for a 40m working width. With a side slope of 1:1 and maximum height of 1.8m an area of 7m has been allocated which includes for any bulking factor. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The area required for subsoil provides enough width in this area to segregate upper and lower subsoils, therefore there would be two separate mounds, which ensures the subsoil can be reinstated properly. A 1:1 side slope and a bulking factor has been incorporated which equates to 7m. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The above areas equate to a working width of 40m.
RR-187-15	Location of the proposed pipeline routes	7.2. This has a "Working Area and Haul Road" of 11m and a pipe trench 4m wide. This is excessive, yet only totals 15m in width. They want a further 25m for topsoil and subsoil storage.	Please refer to the Applicant's response to RR-187-14.
RR-187-16	Location of the proposed pipeline routes	7.3. I have undertaken a simple calculation of what may be needed as a working width - The Haul Road may be 3m wide, with occasional passing places, - Working area 8m, this allows 6m of digger working area, plus 2m pipe storage - Pipe width - this will be 1.5m plus say 1.5m each side of pipe = 4.5m - Topsoil Storage - A fair estimate is to assume 150mm of top soil, across 20m equates to $3m^3$ of top soil, stacked at 1:2, say 2.5m x 1.25m = $3.75m^3$, therefore 2.5m for topsoil storage. - Sub-soil Storage - If the trench is 4m wide and assume a depth of 2m (2.15m below ground level) deep $7.5m^3$ of subsoil, again assume 1:2 stack equates to 4m of subsoil storage. - Excess 2m excess for fencing and other uses - Total working area required - 24m in width	Please refer to the Applicant's response to RR-187-14.

Reference	Theme	Issue raised	The Applicant's response
RR-187-17	Location of the proposed pipeline routes	7.4. It is completely unjustified, unreasonable and unnecessary for the purpose, and disproportionate to permit a working area greater than 24m in width for open cut sections of pipe	Please refer to the Applicant's response to RR-187-14.
RR-187-18	Landowner engagement	7.5. If Southern Water wish to use additional space this can be done by agreement at a market rent with individual landowners.	The Applicant has been seeking voluntary agreements for all land identified for temporary use. Details of this engagement can be found within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1). As detailed within the Statement of Reasons [APP-025], temporary possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the project. Whilst the Applicant's preference is to reach a voluntary agreement, it considers that the temporary possession powers sought within the DCO are necessary to ensure that the project can be delivered where agreement cannot be reached. Reasonable losses incurred by landowners arising out of the temporary use of land will be reimbursed in line with the Compensation Code. The Applicant therefore considers that the temporary possession powers sought are justified and proportionate, whilst maintaining that a voluntary agreement remains its preferred outcome where possible.
RR-187-19	Location of the proposed pipeline routes	8. Scale of Easement Width 8.1. We haven't been provided any justification of the easement width restriction. Southern Water requested a 11m easement for open cut, being 5.5m each side of the pipe, with permanent restriction place on this land. Yet for tunnelled section the easement has been reduced to 2.5m each side of the pipe. 8.2. We have assessed other water providers easement width and the typical easement width for an 800mm pipe is 8m total width. 8.3. We have requested justification for this easement width; this hasn't been supplied. We therefore believe this is unreasonable, unjustified and disproportionate and should be reduced.	The purpose of the easement is to protect the integrity and operational requirements of the pipeline and to ensure appropriate access for inspection, maintenance, repair and replacement activities. The required width has been determined following a detailed technical assessment, taking account of the pipeline's diameter, depth, construction methodology, location and operational function. For sections of pipeline installed using open-cut construction, the Applicant is seeking an easement width of 11m (5.5m either side of the pipeline). This reflects the access and operational requirements associated with maintaining and, if necessary, excavating the pipeline in the future. Notably, this represents a reduction from the Applicant's published stand-off guidance for water mains of a comparable size and depth [1], which would typically require a wider protected corridor. This reduction from the normal requirement has been communicated to landowners and their agents where this is being challenged. For sections constructed using trenchless techniques, a reduced easement width is considered appropriate, taking into account depth, construction methodology and location. As the pipeline is installed at greater depth and future maintenance or operational access would be undertaken from either side of the trenchless section rather than directly above it, the same level of restriction is not required. The easement width has therefore been tailored to

Reference	Theme	Issue raised	The Applicant's response
			reflect the differing operational requirements of the construction methodologies. The Applicant is therefore satisfied that the easement widths proposed represent the minimum reasonably required to protect the pipeline and secure its safe operation over its lifetime. In accordance with the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition have been met. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits, whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) sets out the maximum diameter of the pipelines for the different Project components, which may be greater than the 800mm referenced by the Respondent. The Applicant considers the permanent rights sought are justified in order to protect and preserve the integrity of the Project.
RR-187-20	Landowner engagement	9. Private Negotiations and Alternative to Compulsory Purchase 9.1. We understand that it is not for the planning Inspectorate to comment on the terms of any private negotiated agreements. We must comment that Southern Water have been impossible to work with. They have dictated terms, without giving any consideration to amending the terms. The terms offered are significantly worse that those under compulsory acquisition. 9.2. They are only playing lip-service and have no intention of reaching any form of settlement with Landowners and Occupiers. This is apparent from the Preapplication Land and Rights Negotiation Tracker (Document 4.4) only 1 landowner has returned Heads of Terms out of 172 Category 1 Landowners. The one that has been return is a middle section of a drill section, so no above ground access is needed. 0.58% sign up rate, clearly demonstrates that Southern Water have not made any significant effort to reach agreement with Landowners and Interested Parties and they are relying on taking land by compulsion. 9.3. Not a single Option Agreement has been entered into. 9.4. I believe it is disingenuous to categorize me as "Head of Terms negotiation ongoing" (yellow status). This is not true, Southern Water have shown no interest in reaching an agreement with us. I request that my status is amended to "Heads of Terms agreements unlikely before close of examination (red)".	The Applicant does not recognise the accusations levelled at its approach. The Applicant remains committed to working collaboratively with landowners and disagrees with respondent's suggestion that they have been unwilling to enter into any form of negotiations. The Applicant has made several amendments to the proposed Heads of Terms as confirmed by a relevant representation made by a member of the Land Agent Group [RR-233] and improved the commercial offer during the negotiations to demonstrate this preference. Whilst the Applicant would prefer to be able to advise the Examining Authority of a higher return of signed Heads of Terms, it does not consider this to be because the terms offered to the respondent are unreasonable. To date, despite formally requesting evidence demonstrating why the commercial offer is considered unreasonable on 28 January 2026, the Applicant is yet to receive a response. The Heads of Terms proposed by the Applicant closely align with those adopted across other utilities and infrastructure projects, which have also been reviewed and accepted by respective land agent groups. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with landowners regarding a voluntary agreement. The Applicant refutes the suggestion that it seeks to rely on statutory powers and confirms its preference to reach a voluntary agreement. The Applicant considers that the status recorded by the Applicant in the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4,

Reference	Theme	Issue raised	The Applicant's response
			Version 1) is correct given that Heads of Terms for a voluntary agreement have been issued and are being discussed with the respondent's representative. Following the Heads of Terms being issued on 6 March 2026, the Applicant discussed the Heads of Terms with the respondent's representative at a meeting on 13 May 2026. Following this, the Applicant requested a further meeting on 17 July 2026 and after issuing a proposal for revised terms on 7 August 2026 incorporating amended provisions and improved commercial terms, sought an additional meeting with the respondent's agent on 11 September 2026, evidencing the Applicant's attempts to reach a voluntary agreement. The Applicant will continue to engage with the respondent in an attempt to secure a voluntary agreement. The Applicant most recently met with the respondent and their representative 17 November 2026 to discuss Heads of Terms and the scheme generally.
RR-187-21	Construction impacts and effects	10. Land Quality and Water Logging 10.1. Our soils comprise of Wickham 4 Soil Type, seasonally wet loam to clayey soils over shale. deep clay, described as Slowly permeable seasonally waterlogged clayey soils with impeded drainage. 10.2. Our land can become very wet during the Winter. We wouldn't take a tractor onto our land between November and March, as they will get stuck. 10.3. We believe it will be impossible to work on the land for 4 to 5 months of the year, particularly when the top soil has been stripped and the subsoils compacted with heavy machinery. There is insufficient information within the applicant's submission as how they are going to deal with this issue. How they are going to stop soil erosion and water and sediment runoff to the local streams and ditches. 10.4. How can we the landowner stop the contactors if the ground conditions become detrimental to work in.	The Applicant notes the landowner's comments regarding the characteristics of local soils and potential waterlogging. ES Appendix 12.1 Agricultural land quality [APP-169] identifies the Windsor soil association, comprising slowly permeable clayey soils with impeded drainage, as one of the most prevalent soil types within the Order Limits. Measures for the handling, storage and reinstatement of soils are set out within the Outline Soil Resource Management Plan (SRMP) contained in Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). Good construction practices set out in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), which is secured by a requirement in the DCO, will manage the effects of construction. The mitigation measures outlined in the Outline CEMP will be carried forward and developed into detailed CEMP(s), which will be produced by the Contractor prior to the commencement of construction of the Project. With respect to landowners stopping contractor works, the Outline SRMP highlights the appointment of an Agricultural Liaison Officer (ALO) who will be the primary point of contact for landowners to raise concerns during construction. The roles of the ALO are set out in paragraph B.2.16 of Appendix B of the Outline CEMP (CEMP) (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and include the undertaking of site inspections during construction to monitor working practices including implementation of soil handling methodologies.
RR-187-22	Land use and agriculture	11. Land drainage 11.1. We do have historic clay tiled land drains on the land. One of our big concerns is that these will be damaged beyond repair. We want an independent expert's report before and after the works to ensure they are accurately recorded and reinstated.	The Applicant acknowledges concerns about damage caused to agricultural drains during construction works. The Outline Soil Resources Management Plan (SRMP) provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) notes at paragraph B.2.16 that the Agricultural Liaison Officer will be responsible for a number of roles including coordination of drainage surveys, keeping landowners informed about pre- and post-construction

Reference	Theme	Issue raised	The Applicant's response
			drainage schemes, and undertaking and preparing a Record of Condition to capture the condition of the land prior to commencement of construction. In addition, Measure WE4 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) requires the preparation of a Construction Drainage Plan informed by surveys undertaken by a specialist drainage contractor to identify existing drainage infrastructure and prepare pre-construction drainage drawings. The Construction Drainage Plan will include a methodology for the reinstatement of drainage systems affected by construction and, where reinstatement of existing land drains is not feasible, the implementation of a post-construction drainage plan to restore the drainage status of affected land. The Applicant considers that appropriate measures to protect and/or replace field drains during construction are in place. When the Applicant issued Heads of Terms to the respondent on 6 March 2026, it was also requested that the respondent share any information and/or plans regarding field drains. The Applicant has not received a response to date but again invites this information.

Table 2-38 The Applicant's response to RR-189 from Lesley Good

Reference	Theme	Issue raised	The Applicant's response
RR-189-1	Landowner engagement	My property will be greatly affected by this project; indeed, rendered unfit for the purpose for which it was purchased 5 years ago. As a small equestrian property comprising only 4.5 acres of which approximately 3.5 acres are paddocks, the property is only just big enough to accommodate my 5 horses, one of which is a stallion who has to be kept separately. The proposed project will effectively leave me with about 1 acre of grazing which would also be in close proximity to the extensive groundworks involved in excavating to a depth of 12 feet. My horses would be too nervous to cope with being exposed to such a spectacle. Clearly this would render the whole of my property unsuitable for the purpose it was purchased for, and for a considerable period of time, as reseeding grassland when the project is completed would take anything up to 12-18 months depending on the time of year. The disruption would be great and far reaching.	The Applicant acknowledges that the respondent's land will be impacted by open-cut trenching construction methodology for construction of the pipeline. The Applicant made a refinement to the Order Limits in this location following the Spring 2025 Consultation and further engagement with the respondent, to provide additional flexibility for reducing the temporary construction impact on the Respondent's land. This is set out in paragraph G.7.2 in Appendix G of the Scheme Development Report [APP-075]. The Applicant has identified a need for a 40m working width in areas where the pipeline is constructed by open-cut trenching. The Applicant has sited the pipeline corridor to the eastern boundary of the land parcel and narrowed the Order Limits as much as reasonably practicable at this stage of the design. As set out by the respondent, the land is used for the grazing of horses and the Applicant understands the concerns raised. The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use land occupied by the working width but confirms that it will seek to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design once the Applicant can confirm final working areas required.

Reference	Theme	Issue raised	The Applicant's response
			The Applicant confirms that the respondent may be entitled to claim compensation for crop loss and disturbance losses arising out of the temporary use of the land for construction of the project, in line with the compensation code. This could include the buying in of feed throughout the Applicant's temporary occupation of the land due to the respondent's horses being unable to graze the land whilst the pipeline is constructed. The Applicant welcomes further engagement with the respondent in order to explore potential mitigations on the overall temporary impact on the land. The Applicant is keen to continue to engage with the respondent on the difficulties they will encounter during construction activities. The Applicant wishes to add that none of the restrictions set out in Schedule 5 to the Draft Development Consent [APP-023] will prohibit the respondent from continuing to use the land for the existing equestrian use once construction is complete. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction.
RR-189-2	Landowner engagement	The company dealing with the project, Dalcour Maclaren, have no credible plan for how to manage the predicament I will find myself in on commencement of the works and have been unable, or unwilling, to provide me with satisfactory, or indeed any answers as to how my situation can be managed. My horses are stabled at night and out during the day and the suggestion that livery could be found is ludicrous because all local livery yards are fully booked and would certainly be unable to offer 5 places. Furthermore, livery yards do not accept stallions. It is, in any case, not acceptable to me that my horses would be relocated to what would certainly be facilities of a much lower standard than the ones I have constructed at my property. I feel strongly that this issue should be satisfactorily resolved before planning is decided instead of being an afterthought when work is about to commence.	The Applicant notes the respondent's use of the land and points raised regarding the livery availability in the area. The Applicant also notes that the land use may change before the commencement of construction, and therefore the Applicant confirms that detailed arrangements for mitigating the impacts to the respondent are not currently available. Whilst the DCO application is based on a preliminary design, the detailed design, including aspects such as the final pipeline and working width, will not be available until a contractor has been appointed by Applicant following determination of the DCO. Following the detailed design, the Applicant will discuss any arrangements to mitigate the impacts of construction. The Applicant refers to the confirmation that further engagement is proposed in order to explore potential mitigations further. As outlined further in RR-189-1, the Applicant is open to discussing the respondent's concerns further and has regularly sought to engage with the respondent through the voluntary agreement negotiations, as evidenced in the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1).
RR-189-3	Landowner engagement	I am highly stressed as my property and life appears to be collateral damage. Selling the property to facilitate a move would be unviable as the value of the property is in the equestrian facilities which would be unusable for an unspecified time and duration.	The Applicant acknowledges the respondent's comment and welcomes further engagement regarding the Project as progress is made on detailed design post-consent. See responses in RR-189-1 and RR-189-2. The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use land occupied by the working width but

Reference	Theme	Issue raised	The Applicant's response
			confirms that it will seek to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the respondent may be entitled to claim compensation for crop loss and disturbance losses arising out of the temporary use of the land for construction of the project, in line with the compensation code.
RR-189-4	The process of developing the Project	I believe the route has been ill thought out and no attention given to the consequences for property owners and that a detour or underground excavation should be part of the plan for properties such as mine, which will become unusable for the purpose for which they were purchased.	The Pipeline route has been designed using an extensive route selection process as set out in the Scheme Development Report [APP-073, APP-074, APP-075]. This area is heavily constrained by a number of environmental considerations. If the Pipeline were to be located further to the east beyond Long Copse, it would be constructed in a location that is highly visible from the South Downs National Park which is afforded a high level of protection by national planning policy. The Pipeline route could not be located further west beyond Shirrell Copse due to the presence of residential areas and woodland around Shedfield. The Applicant made a refinement to the Order Limits in this location following the Spring 2025 Consultation, to provide additional flexibility for reducing the temporary construction impact on the Respondent's land. This is set out in paragraph G.7.2 in Appendix G of the Scheme Development Report [APP-075].

Table 2-39 The Applicant's response to RR-190 from BCM Wilson Hill on behalf of Leylands Farm Owners Group

Reference	Theme	Issue raised	The Applicant's response
RR-190-1	Principle of development	We wish to object to the DCO application. Detailed reasons will be submitted.	The Applicant has noted this comment.
RR-190-2	Landowner engagement	1. Introduction I write as the agent for and behalf of my clients who are affected by the above proposed scheme. My clients are freehold landowners directly affected by the above scheme, as it is proposed to cross their land, as shown on the submitted Land Plan Sheets 23 and 24.	The Applicant has noted this comment.
RR-190-3	Principle of development	I am submitting this representation regarding the proposed DCO application for this scheme as we wish to OBJECT to it.	The Applicant has noted this comment.
RR-190-4	Alternatives	2. Summary position We object to the granting of the DCO because the application fails adequately to address whether alternative routes have been sufficiently considered, the	The Applicant has noted this comment. The Pipeline route has been designed using an extensive route selection process as set out in the Scheme Development Report [APP-073, APP-074, APP-075]. This has considered a

Reference	Theme	Issue raised	The Applicant's response
		impacts on the local environment, future development proposals and impact on neighbouring residential and business premises.	range of engineering, planning and environmental criteria and has had regard to a range of stakeholders' feedback.
RR-190-5	Location of the proposed pipeline routes	3. Detailed Grounds 3.1. Consideration of Alternative Routes Despite engaging with two different agents acting on behalf of Southern Water, and despite requesting details of the sequential testing of the proposed route selection, no evidence has been provided to demonstrate why the proposed route across my clients' land has been selected. We consider that alternative routes have not been fully assessed, including a route to the north of the B2177, which would reduce the number of affected landowners and businesses.	The Pipeline route has been designed using an extensive route selection process as set out in the Scheme Development Report [APP-073, APP-074, APP-075]. This has considered a range of engineering, planning and environmental criteria and has had regard to a range of stakeholders' feedback. The Applicant considered a pipeline option that routed along Portsmouth Road (B2177) up to Fisher's Pond. This route was not selected as it would result in adverse impacts on the local highway network, residential properties and ancient woodland, as set out in Section 5.10 of the Scheme Development Report - 1 of 3 documents [APP-073]. However, this option would still require the pipeline to pass through Leylands Farm as it would not be practicable for the Pipeline to be located within Main Road and pass through Colden Common. Any option further to the north of the B2177 would need to be located within the South Downs National Park, which is afforded a very high level of protection by national planning policy. The Applicant made amendments to the Pipeline route in this location, to better align the Order Limits with field boundaries as requested by the landowner. This is explained in paragraph F.10.13 in Appendix F of the Scheme Development Report - 3 of 3 documents [APP-075].
RR-190-6	Landowner engagement	3.2. Failure to consider future development proposals Hampshire County Council has previously considered the land at Leylands Farm as part of a possible highways scheme. Plans showing the proposed route have been provided to Southern Water's agents, yet no response has been received, no changes have been made following provision of that information, and no account appears to have been taken of these proposals.	The Applicant notes this comment and has sought clarity from the respondent's agent regarding the proposed highways scheme. On review of previous correspondence with the respondent's representative, the Applicant can confirm it has not received the information referenced. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken extensive engagement with landowners and considered all feedback provided throughout statutory and non-statutory consultation.
RR-190-7	Landowner engagement	Furthermore, regardless of whether a new highway scheme is implemented, we have received several approaches regarding the potential of Leylands Farm for housing development. These approaches have led to offers under option style agreements to develop the land. These offers are commercially sensitive and private but copies have been provided to Southern Water. Despite this, Southern Waterâ€™s agents have failed to engage with us to explore how any mitigation may be factored in.	Following the Spring 2025 Consultation, it was identified that the construction access from Church Lane intersected with a residential development allocation in Winchester City Council's emerging Local Plan. As detailed in the Consultation Report Appendix H (Autumn 2025 Targeted Consultation [APP-051], the Applicant amended the design to avoid the emerging allocation by moving the access point from Church Lane to the west. Additionally, the design refinement at the Spring 2025 Consultation in this location amended the pipeline route and Order Limits to more closely follow field boundaries. Where feasible, the Applicant has aligned the proposed pipeline route with existing field boundaries to minimise disruption to land use and agricultural operations. However, in some locations this has not been achievable due to overriding technical requirements such as topography,

Reference	Theme	Issue raised	The Applicant's response
			access and constructability, and engineering constraints. In this location, the pipeline route is constrained by the Bow Lake watercourse. To the north of the Bow Lake, the pipeline route and Order Limits cannot be located further south to align with field boundaries, as the construction works would need to take place within flood zones, presenting deliverability and environmental challenges. Although the Applicant is willing to work with the respondent to coordinate proposal and reach a voluntary agreement, the Applicant wishes to highlight that the rest of the land owned by the respondent and being promoted for residential development is not allocated in the local plan or subject to a planning application. On this basis, the Applicant has no certainty the development would materialise.
RR-190-8	Legislation, policy and permits	The Government has a house building policy that seeks to deliver 1.5 million new homes over the parliamentary term. To facilitate this, it has undertaken sweeping planning reforms, including an updated National Planning Policy Framework (NPPF). Failing to take this into account alongside the evidence submitted to Southern Water, is negligent and puts Southern Water in direct conflict with government policy.	The Applicant has considered the potential for land to become developed and has amended the design of the Project where it intersects with land that is allocated in an adopted or emerging local plan, and where there is a live or approved planning application. The Applicant has confirmed that no planning application has been made at this site, and the site is not allocated for residential development in Winchester City Council's adopted or emerging local plan. Therefore, it would not be reasonable for the design of the Project to be implicated when there is no certainty that a development will come forward in this location.
RR-190-9	Noise and vibration	3.3. Impact on neighbouring residential and commercial premises No assessment has been undertaken of the effects of the proposed works on neighbouring residential and commercial properties, including but not limited to: Noise, vibration and dust	The construction and operational phase noise and vibration impacts of the Project have been assessed, as reported in Environmental Statement (ES) Chapter 15 Noise and vibration [APP-094]. With reference to the ES Appendix 15.1 Construction noise and vibration assessment [APP-179], this dwelling (R137) will be mainly affected by construction noise associated with the short-term works (<4-weeks), associated with the 'Pipeline –Construction' and 'Road Crossing' stages. As a minimum all construction noise impacts/effects would be mitigated through the implementation of Best Practicable Means with additional noise and vibration mitigation measures where required. The Outline (CEMP) (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) provides potential mitigation options, the final package of noise mitigation will be identified in a Noise and Vibration Management Plan to be submitted to the relevant local planning authority for approval prior to commencement of construction. Vibration generating activity would not take place within a proximity to R137 that would result in adverse impact/effect on people or property. Consequently, no significant construction noise and/or vibration impacts/effects would result. R137 is more than 1km from any source of operational noise (i.e. the Water Recycling Plant, Break Pressure Tank and Intermediate Pumping Stations). Hence this dwelling would not experience operational noise effects from the

Reference	Theme	Issue raised	The Applicant's response
			project. With reference to the ES Appendix 15.3 Operational noise assessment [APP-181], operational noise levels at this dwelling would be low andnot of magnitude that would result in adverse impact. For matters related to dust please see the Applicant's response to RR-190-13.
RR-190-10	Socio-economic, tourism and health	Impact on businesses	The Applicant welcomes the comment from BCM Wilson Hill on behalf of Leylands Farm Owners Group in relation to the impact of the Project on businesses. Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091] assesses the effects of the Project on commercial property and land, including rural business parks and other commercial land uses. Leylands Business Park is identified as a commercial property and land receptor within the study area. The assessment considers the potential for temporary impacts on business operations arising from disruption to access associated with construction activities and traffic management measures on the B3354 Winchester Road. The assessment concludes that access to businesses would be maintained at all times. Whilst disruption and delay to road users caused by road or lane closures could temporarily affect access, the impacts would be short-term in nature. Taking account of the measures secured through the Framework Construction Traffic Management Plan [APP-415] and Traffic Management Strategy [APP-416], including a sequential approach to road closures to reduce disruption, the magnitude of impact is assessed as minor. This results in a minor adverse effect which is not significant. Mitigation measures set out in the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) include maintaining access wherever reasonably practicable, measures to reduce construction traffic impacts on local road networks, and ongoing engagement with affected businesses. Where engagement identifies that business operations, land use activities or other functions would be affected or interrupted, compensation would be payable in accordance with the relevant provisions of the Development Consent Order and the statutory compensation code. The Applicant therefore considers that the potential effects of the Project on businesses, including Leylands Business Park, have been appropriately assessed and that the residual effect would be minor adverse and not significant.
RR-190-11	Socio-economic, tourism and health	Impact on residential amenity	The Applicant welcomes the comment from BCM Wilson Hill on behalf of Leylands Farm Owners Group regarding the impact of the Project on residential amenity. ES Chapter 12 Land use and agriculture [APP-091], considers the impact of the Project on residential property. Within Section 12.7 a residential receptor assessment was undertaken to identify and evaluate potential impacts on residential properties within the study area. Using Moata, which is a web-

Reference	Theme	Issue raised	The Applicant's response
			based geographic information system (GIS) mapping software, owned and managed by Mott MacDonald, residential address receptors were mapped both within the Order Limits and a 500m buffer zone. The Order Limits include a total of 95 residential properties, all but one are located in Section D and the pipeline here is in tunnel. The potential impacts on identified residential properties such as, temporary loss of access and boundary features during construction and decommissioning, and in-combination amenity effects are assessed in section 12.8. The assessment concludes that there are no significant effects resulting from temporary loss of access and boundary features or in combination effects on amenity for residential receptors. In addition, Section 17.8 of ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1), considers the impact of the Project on neighbourhood amenity, which describes peoples experience of their local environment and perceptions about neighbourhood quality and consequently wellbeing and quality of life. The Applicant therefore considers that the potential effects of the Project on residential property and residential amenity have been appropriately assessed within ES Chapter 12 Land use and agriculture [APP-091], and ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1)
RR-190-12	Socio-economic, tourism and health	Local economic and community effects	The Applicant welcomes the comment from BCM Wilson Hill on behalf of Leylands Farm Owners Group regarding local economic and community effects. The Applicant has assessed employment, supply chain and community effects within 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) sets out the labour requirements associated with construction of the Project and includes an assessment of net employment effects, taking account of the potential for jobs to be retained within Hampshire and the South East of England. The assessment identifies a peak workforce of approximately 1,100 gross full-time equivalent (FTE) employees and an average workforce of approximately 600 gross FTE employees during construction. The assessment also considers indirect and induced employment effects arising from supply chain expenditure and spending by construction workers. Section 17.8 of ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1) also includes an assessment of health and community effects, including the potential effects on community land, facilities, social infrastructure and recreational receptors. Where relevant, the assessment considers how changes to these receptors may influence health outcomes. The Applicant therefore considers that the likely economic, community and health effects of the Project have been appropriately assessed within ES

Reference	Theme	Issue raised	The Applicant's response
			Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1).
RR-190-13	Air quality and odour	The Applicant notes that BCM Wilson Hill on behalf of Leylands Farm Owners Group has concerns around potential construction impacts from the Project on neighbouring residential and commercial premises and that no assessment has been undertaken of the effects of the construction phase of the Project for impacts including construction dust.	The Applicant has assessed the potential dust impacts on sensitive receptors including neighbouring residential and commercial premises along the pipeline route within section 6.8 of ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1). The assessment has been undertaken in accordance with the Institute of Air Quality Management guidance on the assessment of dust from demolition and construction (v2.2 2024). For construction dust, the method is outlined in ES Appendix 6.1 Construction dust and fine particulate matter assessment methodology [APP-109]. This involves screening the need for a dust assessment, defined the potential dust emission magnitude and sensitivity of the area which was then combined to derive a risk of impact. The assessment takes a worst case approach and focuses on areas where construction activity is expected to be the most intensive and combines this with consideration of the closest proximity to the highest number of receptors along the entirety of the Order Limits. Mitigation measures to control dust emissions during the construction phase of the Project are then identified. These measures are commensurate to the level of risk for each construction activity (demolition, construction earthworks and trackout). As the assessment takes a worst case approach, the identified mitigation measures are therefore commensurate with the highest level of risk for each construction activity. The identified mitigation measures are detailed within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and will be applied to all construction activities on the Project. Therefore, the identified mitigation measures will be applied at all work areas, including at those work areas that neighbour residential and commercial properties associated with Leylands Farm Owners Group. The assessment of potential construction dust impacts within section 6.8 of ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1) has concluded that, with the application of identified mitigation measures during the construction phase of the Project, the overall effect will be not significant. The Applicant has also assessed other potential impacts associated with the construction of the Project. These assessments are summarised below, and include: • Construction phase road traffic emissions; • Construction phase non-road mobile machinery; • Construction phase odour emissions. Construction phase vehicle trips were screened against relevant assessment thresholds within ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1). In accordance with the Environmental Protection UK and Institute of Air Quality Management guidance, the effect of Project-

Reference	Theme	Issue raised	The Applicant's response
			generated construction phase road traffic emissions at human receptors is not significant. The Applicant has assessed potential impacts of construction machinery (including non-road mobile machinery (NRMM)) and construction traffic within section 6.8 of ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1). In accordance with Local Air Quality Management Technical Guidance (LAQM.TG(22)), appropriate mitigation has been identified and is incorporated into the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) with the mitigation measures designed such that any residual effect in relation to emissions associated with NRMM is not significant. The Applicant has assessed potential impacts associated with construction phase odour emissions. The approach undertaken considered an area of worst case risk at the site of the Water Recycling Plant and commensurate odour control measures (AQ16 and AQ17) which are detailed within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3).
RR-190-14	Landowner engagement	My clients reside at [REDACTED]. Adjacent to their house is an office business park, which they own and manage. This business park was created through farm diversification to provide a source of non-farming income. Both the farmhouse and business park are located approximately 100 metres from the proposed pipeline working area. Business tenants are already asking what mitigation measures will be put in place to address the factors listed above and what compensation will be available. As their landlord, we have been unable to answer these questions because Southern Water has not undertaken any assessments addressing these issues.	The Applicant notes the comments about the adjacent business park. The Applicant had direct engagement with the respondent in March 2024 where the respondent provided a list of all of the tenants of the business park. In the same correspondence, the respondent advised that none of the tenants had an interest in the surrounding land owned by the respondent, which means their interests are restricted to the business park which is outside of the Order Limits. Nonetheless, the Applicant welcomes the opportunity to meet with the respondent and their business tenants as required to discuss the Project, but no such request has been received to date. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken extensive engagement with landowners and considered all feedback provided throughout statutory and non-statutory consultation.
RR-190-15	Landowner engagement	3.4. Engagement to Date Although Southern Water has engaged with landowners affected by the pipeline, its failure to secure voluntary agreements across most of the route demonstrates that its engagement has fallen well below the standard expected for a DCO. The commercial terms that Southern Water have offered to landowners are far below what a reasonable landowner would expect in a 'no scheme world'. This, combined with a lack of engagement on important matters affecting landowners, means that Southern Water is applying for a DCO without having secured landowner agreements. We respectfully ask the Examining Authority	Whilst the Applicant would prefer to be able to advise the Examining Authority of a higher return of signed Heads of Terms, it does not consider this to be because the terms offered to landowners are unreasonable or below what would be expected in a 'no scheme world'. To date, despite formally requesting evidence demonstrating why the commercial offer is considered unreasonable on 28 January 2026, the Applicant is yet to receive a response. The Heads of Terms proposed by the Applicant closely align with those adopted across other utilities and infrastructure projects, which have also been reviewed and accepted by respective land agent groups.

Reference	Theme	Issue raised	The Applicant's response
		to question why this is. If a competent authority had undertaken proper due diligence and engagement, and had offered commercial terms, it would not find itself in this position.	As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with landowners regarding voluntary agreements and has continued discussions with landowners. To facilitate collective engagement on voluntary agreements, a number of professional representatives formed a Land Agent Group in February 2025. The Applicant issued draft Heads of Terms to the Land Agent Group on 3 February 2025 and subsequently engaged in negotiations on the terms. This engagement included in-person meetings with the Land Agent Group and several revisions to both the Heads of Terms and the commercial offering in response to feedback received. Following these discussions, the Applicant commenced issuing Heads of Terms to all landowners on 6 March 2026. Since acceptance of the DCO application for Examination, the Applicant has made further amendments to clauses within the proposed Heads of Terms and an improved commercial offer to landowners, further demonstrating reasonable efforts to engage constructively and reach a voluntary agreement. The Applicant continues to offer meetings with landowners and their professional representatives to discuss Heads of Terms and reiterates its preference to reach a voluntary agreement wherever possible.
RR-190-16	Alternatives	4. Conclusion In conclusion, Southern Water have failed to provide clear evidence that they have properly considered alternative routes or that the extent of the acquisition is proportionate.	The Applicant has noted this comment. The Pipeline route has been designed using an extensive route selection process as set out in the Scheme Development Report [APP-073, APP-074, APP-075]. This has considered a range of engineering, planning and environmental criteria and has had regard to a range of stakeholders' feedback. The Applicant made amendments to the Pipeline route in this location, to better align the Order Limits with field boundaries as requested by the landowner. This is explained in paragraph F.10.13 in Appendix F of the Scheme Development Report - 3 of 3 documents [APP-075].
RR-190-17	Consultation	Southern Water has failed to resolve the concerns raised with it and has failed to undertake the level of consultation required under the Planning Act.	The Applicant has had regard to all feedback, which has informed the design of the Project. The Scheme Development Report [APP-073, APP-074, APP-075] and the Consultation Report [APP-029] set out the process that has been undertaken to design the Project and sets out how feedback from landowners and other stakeholders has been considered. The Applicant undertook an extensive level of public consultation during the pre-application phase of the Project. The Consultation Report [APP-029] demonstrates conclusively that the Applicant has complied with the requirements of Section 42, 44 and 47 of the Planning Act 2008. This was also the view of all seven host local authorities when the Applicant consulted them in preparing the Adequacy of Consultation Milestone submission as part of the pre-application procedure and subsequently confirmed through their Adequacy of Consultation Representations. The Planning Inspectorate concurred and the application has now been accepted.

Reference	Theme	Issue raised	The Applicant's response
RR-190-18	The draft DCO	Southern Water has not demonstrated that their interference with property rights is lawful or proportionate. Its actions create a private loss for my clients, whose residential and business amenities are directly affected by the scheme, and therefore Southern Water fails to meet the requirements of the European Convention on Human Rights. For the reasons set out above, the Examining Authority and Secretary of State should refuse the application.	The Applicant does not agree that the Project represents an unlawful or disproportionate interference with property rights, nor that it is incompatible with the European Convention on Human Rights ("ECHR"). The Applicant has considered the potential effects of the compulsory acquisition and temporary possession powers sought and has assessed these matters in the Statement of Reasons [APP-025]. The Application explains why the land and rights sought are necessary for the construction, operation, maintenance and protection of the Project, and why the powers sought are proportionate and no more extensive than is reasonably required. In particular, the Applicant has sought rights rather than freehold acquisition wherever practicable and has limited the extent of the powers sought to those required to facilitate delivery of the Project. The Applicant acknowledges that the exercise of compulsory acquisition and temporary possession powers may affect private interests. However, affected persons are entitled to compensation in accordance with the statutory compensation code, and the availability of compensation forms an important part of the overall balance when assessing proportionality. The Applicant has also undertaken engagement with affected landowners and will continue discussions with those affected by the Project. As set out in the Statement of Reasons [APP-025], the Applicant considers that the interference with rights protected by Article 1 of the First Protocol, Article 6 and Article 8 of the ECHR is justified, necessary and proportionate, and that the significant public benefits of the Project outweigh any private loss that may be experienced by affected landowners.

Table 2-40 The Applicant's response to RR-205 from Mark Thistlethwayte

Reference	Theme	Issue raised	The Applicant's response
RR-205-1	Landowner engagement	The proposed development will have unacceptable impacts on the operation of the Land at Mayles Lane that have not been fully considered by the Applicant. Further details can be found in our representations to follow today.	The Applicant notes this comment; however no planning application has been made at this site and the site is not allocated for development in Winchester City Council's adopted or emerging location plan. Therefore, it would not be reasonable for the design of the Project to be influenced when there is no certainty that a development will come forward in this location.
RR-205-2	Greeting	1. Introduction 1.1 We act for Mr Mark Thistlethwayte (our 'Client'). 1.2 Our Client is the freehold owner of land on the east side of Mayles Lane, Wickham, Fareham, Hampshire and registered at HM Land Registry under title number HP898365 (the 'Land at Mayles Lane'). A copy of the registered title plan is attached at Annexure 1.	The Applicant notes this comment.

Reference	Theme	Issue raised	The Applicant's response
RR-205-3	Landowner engagement	1.3 Approximately 3 Land Plots, as set out in the Book of Reference (APP-027), are situated in Land at Mayles Lane. For those plots, our Client is therefore a category 1 person as set out in s. 57 Planning Act 2008. The precise plots are set out in the Schedule at Annexure 2 to this Relevant Representation (the 'Schedule'). Please note that the land plots identified are based on a review of the various Land Plans against the registered title plan to tour Client's Land. As such, it is possible that there may be discrepancies as we have not carried out any Land Registry SIM searches to verify the position. It is therefore possible that additional land plots may be identified as part of our more detailed review of the Application.	The Applicant has undertaken diligent inquiry to obtain the details of persons with an interest in the Order Limits, as summarised in the Consultation Report [APP-029] Section 9.3.17 to 9.3.30. As part of this process Land Interest Questionnaires (LIQs) were issued to the respondent ahead of the Summer 2024 Consultation to assist the respondent in identifying themselves, confirming contact details and clarifying land ownership, occupation, tenancy arrangements and any other interests in land, including rights of way and option agreements. The LIQs also sought to confirm that land ownership and occupation boundaries were correctly identified. The Applicant did not receive a response to these LIQs from the respondent despite reminder letters being sent. The Applicant then issued the respondent a Confirmation Schedule in October 2025, which summarised the Applicant's understanding of the respondent's interest in land relevant to the Project. The Applicant sought a response to confirm whether the information held was correct, however no response was provided despite a further reminder letter being issued in December 2025. The Applicant has since had further engagement with the respondent's land agent throughout September 2026 regarding their land interests and is now undertaking a review of the respondent's interests within the Order Limits. The Applicant is in the process of checking and verifying the information with the respondent and will update the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1) accordingly with any necessary amendments.
RR-205-4	Landowner engagement	1.4 Our Client may also be classified as Category 2, Category 3 and Part 3 persons in respect of land plot numbers neighbouring Land at Mayle's Lane.	Please refer to the Applicant's response to RR-205-3 regarding the Applicant's engagement with the respondent on their land interests. As part of this engagement, the Applicant will check and verify with the respondent regarding neighbouring land at Mayle's Lane.
RR-205-5	Landowner engagement	1.5 These representations focus on identifying the impacts arising where our client is a Category 1 Person.	The Applicant notes this comment.
RR-205-6	Principle of development	1.6 Our Client objects to the application, for the reasons set out below.	The Applicant notes this comment.
RR-205-7	Landowner engagement	2. Book of Reference inaccuracies 2.1 The plots of land that Our Client has an interest in is shown on Land Plans number 13 of 30, as set out in APP-010.	Please refer to the Applicant's response to RR-205-3 regarding the Applicant's engagement with the respondent on their land interests.
RR-205-8	Landowner engagement	2.2 We have reviewed the Book of Reference and the Land Plans, solely for the purpose of determining the land plots that the Applicant believes Our Client has an interest in as listed here. This review has not involved a technical overlay of plans nor full title referencing.	Please refer to the Applicant's response to RR-205-3 regarding the Applicant's engagement with the respondent on their land interests.

Reference	Theme	Issue raised	The Applicant's response
RR-205-9	Landowner engagement	2.3 Nevertheless, we understand that the information in the Book of Reference relating to Our Client's interests is not fully accurate and we are therefore undertaking our own land referencing exercise to confirm this information. Our Client's full position will be set out in due course. Where errors have already been identified, this is referred to in the Schedule.	Please refer to the Applicant's response to RR-205-3 regarding the Applicant's engagement with the respondent on their land interests.
RR-205-10	Landowner engagement	2.4 In particular, the 'Owner' referred to in the Book of Reference for all the land plots identified in the Schedule should be Mark Thistlethwayte, Southwick Estate, The Estate Office, West Street, Southwick, Fareham, Hampshire, PO17 6EA. Rather than the details for the Owner currently referred to in the Book of Reference.	Please refer to the Applicant's response to RR-205-3 regarding the Applicant's engagement with the respondent on their land interests.
RR-205-11	Landowner engagement	2.5 We also note that the Owner has not been properly identified. Further details will be provided to the Applicant, in the first instance outside of the Examination.	Please refer to the Applicant's response to RR-205-3 regarding the Applicant's engagement with the respondent on their land interests.
RR-205-12	Landowner engagement	3. Negotiations to avoid compulsory acquisition before the application for compulsory purchase powers 3.1 Our Client is keen to reach a private agreement with the Applicant relating to the impacts of the Application. However, there has been very little meaningful engagement to date from the Applicant. Our client acknowledges that meetings have taken place with the Applicant, they have been presented with heads of terms for the acquisition of the necessary rights for the DCO, however Our Client does not perceive any genuine desire by the Applicant to negotiate as all of our Clients suggested amendments to the heads of terms were rejected but without good reason.	The Applicant is committed to working collaboratively with landowners and it remains the Applicant's firm preference to reach a voluntary agreement for the acquisition of land and rights where possible. As detailed within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken extensive attempts to meaningfully engage with landowners on voluntary agreements and has continued to have productive discussions with them either directly or through their professional representatives. In February 2025 a number of the professional representatives, including the respondent's land agent, formed a Land Agent Group to collectively consider and progress discussions on Heads of Terms for voluntary agreements to ensure that all land agents representing landowners impacted by the project were represented equally, regardless of land holding or perceived impact. The Applicant issued Heads of Terms to the Land Agent Group on 3 February 2025 to provide them an opportunity to review the proposals and gather comments ahead of the first meeting between the Land Agent Group and the Applicant. The Land Agent Group provided their initial comments on the Heads of Terms on 24 February 2025. Following this, the Applicant undertook a multidisciplinary review of the comments made. In addition to this, several points were also referred to external consultants to ensure a comprehensive review was completed and that the terms were aligned with what was being sought in the DCO application. The Applicant responded to the Land Agent Group on 5 August 2025 with further updates to the Heads of Terms. The first Agent Group meeting was held on 10 September 2025 where the Applicant and the Land Agent Group reviewed and discussed comments on the Heads of Terms. There was a second meeting on 23 January 2026 to discuss further feedback from the Land Agent Group, after which the Applicant

Reference	Theme	Issue raised	The Applicant's response
			issued the final template for the Heads of Terms on 26 February 2026. Following this, the Applicant commenced issuing Heads of Terms to landowners on 6 March 2026. The Applicant then reviewed further feedback received in June 2026 from the Land Agent Group on both the terms and commercial offer. A third Land Agent Group meeting was held to discuss these points further on the 14 July 2026. Based on this feedback the Applicant wrote to all landowners on the 7 August 2026 with an improved commercial offer and amended terms to address further points from the Land Agent Group. The Applicant considers that this sustained programme of engagement and negotiation demonstrates that significant efforts have been made to secure voluntary agreements prior to, and alongside, the compulsory acquisition process. The Applicant remains willing to discuss voluntary agreements and is continuing to engage with the respondent's land agent, most recently in a meeting on 10 November 2026 regarding their feedback and comments on the Heads of Terms.
RR-205-13	Land use and agriculture	4. Impacts on the Land at Mayles Lane 4.1 Schedule 1 sets out, in detail and plot by plot, the negative impacts of the Application on the Land at Mayles Lane if granted. The Land at Mayles Lane is currently used for agricultural purposes. Our Client plans to use it for solar and/or battery storage development. In broad terms, the impacts are:	The Applicant notes that the land is currently used for agricultural purposes and that the landowner has indicated an intention to use the land for solar and/or battery storage development in the future. The Applicant has considered the potential for future development as part of the design process and responds to these matters in RR-205-14.
RR-205-14	Location of the proposed pipeline routes	4.1.1 It will have a negative impact on the utility of the Land at Mayles Lane for solar and battery projects. The proposed pipeline cuts through the centre of the land, sterilising parts of it. That will obviously have impacts on the design, layout and utility of the proposed solar project.	The Applicant has considered the potential for land to become developed and has amended the design of the Project where it intersects with land that is allocated in an adopted or emerging local plan, and where there is a live or approved planning application. The Applicant has confirmed that no planning application has been made at this site, and the site is not allocated for development in WCC's adopted or emerging local plan. Therefore, it would not be reasonable for the design of the Project to be influenced when there is no certainty that a development will come forward in this location.
RR-205-15	Land use and agriculture	4.1.2 The farming will be disrupted during both construction and potentially during operation if any emergency access to the pipe is required. There may be harm to the soil through the disturbance of its structure, compaction and rutting, the proposed construction compounds may well restrict access within and between fields, and even fairly common issues like construction traffic can have negative impacts on the smooth running of farm operations during sensitive seasons (such as harvest season).	Disturbance to individual field parcels affected by the pipeline route will be temporary and short-term, as confirmed in Environmental Statement (ES) Chapter 12 Land Use and Agriculture [APP-091], with land being reinstated over the pipelines as soon as is practicable. The Outline Soil Resources Management Plan (SRMP), provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), highlights the appointment of an Agricultural Liaison Officer (ALO) who will be the primary point of contact for landowners to raise concerns during construction.

Reference	Theme	Issue raised	The Applicant's response
			The roles of the ALO are set out in paragraph B.2.16 and include ensuring landowners, occupiers and their agents are consulted in respect of requirements for field entrances and crossing points across the construction working width, particularly to severed land parcels, and the undertaking of site inspections during construction to monitor working practices including implementation of soil handling methodologies. In addition, measure LUA3 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) provides that stiles, gates or gaps will be incorporated into temporary fencing where reasonably practicable to maintain access for landowners and occupiers, and that access points will be provided across the construction working width where reasonably practicable to mitigate field severance. The soil handling methodologies outlined in the Outline SRMP and to be further developed in the detailed SRMP are centred upon best practice measures for avoiding and minimising damage to soils and promoting re-establishment of the original land quality. Chapter 18 Traffic and transport [APP-097] assesses the likely effects on local traffic for each component of the Project. Each section is assessed as having a minor or negligible adverse effect on driver delays on the affected local road network.
RR-205-16	Land use and agriculture	4.1.3 Our Client is concerned about the environmental impact of the project and in particular the long term damage caused to the land by water logging, which is difficult to reverse.	All soils affected by construction works will be managed according to best practice principles as contained in the Outline Soil Resources Management Plan (SRMP), provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). The Outline SRMP includes protocols for determining appropriate soil handling conditions in relation to soil moisture state and rainfall criteria. The soils will be managed according to industry good practice to minimise damage caused to soils, including through compaction by machinery. In addition, Measure WE4 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) requires a Construction Drainage Plan, informed by drainage surveys, to ensure appropriate reinstatement of drainage systems affected by construction activities. Measures in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) include controls to minimise runoff in order to protect nearby watercourses and drainage features during construction. Land temporarily required for pipeline construction would be reinstated in accordance with the Outline SRMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) to enable its return to its existing agricultural use.

Reference	Theme	Issue raised	The Applicant's response
RR-205-17	Alternatives	4.2 Our Client remains willing to engage with the Applicants to consider and provide alternatives, both relating to alternative sites for the proposed infrastructure and/or alternative wording for the rights sought under, or requirements of, the draft DCO.	The Applicant notes this comment and will continue to engage with the Respondent to consider how the Project will interface with their future development proposals as they progress.
RR-205-18	Landowner engagement	Annexure 1 Registered Title Plan HP898365 [Map Image]	The Applicant notes this comment.
RR-205-19	Landowner engagement	Annexure 2 Schedule [Attachment – drawing from HM land registry of tile plan] Property: Land at Mayles Lane (title number HP898365 - freehold) Registered Proprietors: Mark Thistlethwayte of Southwick Estate, The Estate Office, West Street, Southwick, Fareham, Hampshire, PO17 6EA When considering the plans please note the following key: [IMAGE] Relevant plot numbers shown as blue highlight Relevant plot numbers shown as pink highlight Relevant plot numbers shown as yellow highlight Drawing reference (APP-010) 23008223_PLN_LAND_13 Land Plan Number Sheet 13 of 30 Land Plots 13-017	The Applicant notes this comment.
RR-205-20	Location of the proposed pipeline routes	Land plots 13-017 Impacts of DCO: Now – The works may also introduce uncertainty and constraints in respect of potential solar and other renewable energy projects, which could hinder future development opportunities and the Estate's ability to realise associated income and environmental benefits.	The Applicant has considered the potential for land to become developed and has amended the design of the Project where it intersects with land that is allocated in an adopted or emerging local plan, and where there is a live or approved planning application. The Applicant has confirmed that no planning application has been made at this site. Therefore, it would not be reasonable for the design of the Project to be influenced when there is no certainty that a development will come forward in this location.
RR-205-21	Land use and agriculture	Land plots 13-017 Impacts of DCO: during construction – The works will disrupt the Estate's arable operations and may cause damage to agricultural land through soil compaction, rutting, and disturbance of soil structure. This could adversely affect crop production, increase management costs, and reduce the agricultural productivity and value of the affected land.	Please refer to the Applicant's responses to RR-205-15 and RR-205-16. By reducing disruption to agricultural operations, handling soils according to good practice, reinstating soils promptly and maintaining land drains, all in accordance with the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), the Applicant considers that there are adequate controls to promote the re-establishment of agricultural activity and productivity, and that there will be no adverse effect on the value of the land as a result of the Project.
RR-205-22	Location of the proposed pipeline routes	Land plots 13-017 Impacts of DCO: during operation – The affected land is being considered for future renewable energy development, including a solar farm and/or battery storage facility. The proposed pipeline route passes through the centre of the land and is likely to constrain the layout, design, construction and operation of	The Applicant has considered the potential for land to become developed and has amended the design of the Project where it intersects with land that is allocated in an adopted or emerging local plan, and where there is a live or approved planning application. The Applicant has confirmed that no planning application has been made at this site, and the site is not allocated for

Reference	Theme	Issue raised	The Applicant's response
		any such scheme. The pipeline, together with the associated easement rights and access requirements, may impose ongoing restrictions on development, reduce the developable area and adversely affect the viability, capacity and value of any future renewable energy project. As a result, the Estate may suffer financial loss through reduced development potential, lost income opportunities and diminution in the value of the affected land.	development in Winchester City Council's adopted or emerging local plan. Therefore, it would not be reasonable for the design of the Project to be influenced when there is no certainty that a development will come forward in this location.
RR-205-23	Land use and agriculture	Land Plots 13-018 Impacts of DCO: Now – As above Impacts of DCO: during construction – The compounds may restrict access within and between fields, disrupting normal agricultural operations. Construction traffic and temporary occupation of land could interfere with cultivation, harvesting and other farming activities, potentially resulting in crop losses, reduced productivity and additional management costs for the Estate. Impacts of DCO: during operation – Can cause permanent damage to field affecting year and damage land causing water logging and damage to land which is difficult to reverse	The Outline Soil Resources Management Plan (SRMP), provided at Appendix B of the Outline Construction Environmental Management Plan (Outline CEMP) (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), highlights the appointment of an Agricultural Liaison Officer (ALO) who will be the primary point of contact for landowners to raise concerns during construction. The roles of the ALO are set out in paragraph B.2.16 and include ensuring landowners, occupiers and their agents are consulted in respect of requirements for field entrances and crossing points across the construction working width, particularly to severed land parcels. Please refer to the Applicant's response to RR-205-16 for measures on how permanent effects to soils will be avoided through the Outline SRMP and the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), to minimise soil compaction, protect soil structure, avoid waterlogging and support reinstatement of agricultural land following construction.
RR-205-24	Construction impacts and effects	Land plots 13-019 Impacts of DCO: now – As above Impacts of DCO: during construction – As above Impacts of DCO: during operation – As above	Please refer to the Applicant's response to RR-205-23. The impacts would be the same for plot 13-019 as for plot 13-018.

Table 2-41 The Applicant's response to RR-215 from Melanie Flint

Reference	Theme	Issue raised	The Applicant's response
RR-215-1	Landowner engagement	I would like to be involved in the Compulsory Purchase element of the DCO and be kept aware of amendments to plans and boundaries that could impact my land use.	The Applicant confirms that the respondent is included in Part 1 of the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1) and will therefore be kept aware of amendments to plans and boundaries as necessary.

Table 2-42 The Applicant's response to RR-219 from Ian Judd and Partners on behalf of Mr John Platt

Reference	Theme	Issue raised	The Applicant's response
RR-219-1	Greeting	Please see email containing the Relevant Representations Relevant Representation Prepared on Behalf of John Platt In Relation to Hampshire Water Transfer and Water Recycling Project	The Applicant notes this comment.
RR-219-2	Landowner	1. Key Information Name of Interest party: [REDACTED] Address: 10 Beaufort Road, Waltham Chase, Southampton SO32 1LZ Email Address: [REDACTED] @hotmail.co.uk Telephone Number: [REDACTED] . Name & Address of Property Affected: Land at Black Horse Lane, Waltham Chase Land Plan Reference No: 16-019 Area of Acquisition Rights requested: 2861 square metres Linear length of pipe: 77m Use of Land: Private leisure and recreation, Small Holding, Equestrian Grazing Interest Parties on my land: Owner Occupied Land Agent Instructed: Ian Judd and Partners, 4 High Street, Bishops Waltham, Southampton, Hampshire, SO32 1AB - 01489 896422 [REDACTED]@ianjuddandpartners.co.uk	The Applicant notes this comment.
RR-219-3	The draft DCO	2. Summary of Submission 2.1. I wish to become an interested party and submit my strongest objection to this Development Consent Order Application. 2.2. We accept the project but believe the scale of land taken is excessive and should be reduced to what is absolutely necessary for the scheme.	The Applicant notes this comment. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-219-4	Land use and agriculture	3. Summary of Land Use 3.1. We own a total of 2.15 acres (0.86 ha) of land at Shirrell Heath. The land is used as a small holding, with equestrian grazing.	The Applicant notes the respondent's ownership of approximately 2.15 acres (0.86ha) of land at Shirrell Heath and its use as a smallholding for equestrian grazing. ES Chapter 12 Land use and agriculture [APP-091] considers potential effects on agricultural land use, including disruption to livestock movements, access,

Reference	Theme	Issue raised	The Applicant's response
			boundary features, water supplies and field drainage. ES Chapter 12 Land use and agriculture [APP-091] also considers potential effects on equestrian centres and other equestrian and outdoor activities. The assessment identifies the potential for temporary and short-term effects arising from temporary land loss, traffic delays, access changes and changes in the operating environment. Overall, effects on equestrian centres are assessed as minor adverse and not significant. Measures secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) include maintaining access for landowners and occupiers where reasonably practicable, providing additional access points where practicable to mitigate field severance, and relocating troughs, standpipes or field water supplies where grazing land is severed. The Applicant will continue to engage with the respondent regarding the detailed use of the land and any potential effects on the smallholding and equestrian grazing activities.
RR-219-5	Attitudes to water recycling	4. Scheme overview 4.1. We do not think this is the correct system. We do not support the use of sewage in our drinking water. There is no evidence that Southern Water can remove chemicals or heavy metals from the water, which the public will be drinking.	The need for the Project and an explanation of the alternatives considered, including alternative technologies, is presented in the DCO submission in the Case for the Project (Document reference 5.6, DCO Volume 5, Version 1) and the Scheme Development Report [APP-073 to APP-075 - 3 documents]. Water recycling is a well-established and internationally proven technology, successfully implemented in countries such as the United States, Australia and Singapore. It also has precedent in the UK: Essex & Suffolk Water has operated an indirect water recycling scheme at Langford since 2002, which treats wastewater to augment river flows, with the water then abstracted and treated further for potable supply. The Full Advanced Treatment (FAT) process used comprises micro-filtration and reverse osmosis membranes and an ultraviolet advanced oxidation and disinfection process (UVAOP) to remove chemicals and biological contaminants from source material. The selected process is reliable multi-barrier treatment approach which has been in operation for over 40 years internationally. Water recycling also has national policy support. The National Policy Statement for Water Resources Infrastructure (NPSWRI) recognises that water recycling "has the advantage of being a constant, reliable supply of water and may reduce the amount of water abstracted from the environment" (paragraph 2.6.16) and the recent position paper (October 2025) from the Environment Agency "Water recycling for public water supply" is explicit that water recycling is needed to meet the challenges facing our national water resources stating "we believe that water recycling schemes should play a larger role in our future national water supplies". The output of the water recycling plant will also be controlled by an Environmental Permit, ensuring that the quality of the recycled water is maintained and does not result in harm to the environment.

Reference	Theme	Issue raised	The Applicant's response
			The Applicant has conducted extensive trials through its water recycling pilot plant and with experts from the University of Brighton (Mayor-Smith (2024), [2] as referenced in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1). Testing has included analysis of heavy metals, pharmaceuticals and personal care products, pesticides, trace organic contaminants, including forever chemicals, and volatile organic compounds. Data from the Applicant's pilot plant trials has shown that the purified recycled water produced would provide a safe and sustainable source of supply. The Applicant remains committed to transparency, rigorous monitoring and full compliance with all relevant regulations throughout the development and operation of the Project. The recycled water will be blended with spring water and stored in the reservoir until it is abstracted. At this point, the water will be sent to Otterbourne Water Supply Works for further treatment to ensure that it meets the high drinking water quality standards required by the Drinking Water Inspectorate. Please refer to RR-WRPR-03 for further information about the effectiveness of the water recycling process at removing contaminants. Please also refer to Appendix F of The Applicant's written summaries of oral submissions at OFH1 and ISH1 and post hearing actions (Document reference 8.9, DCO Volume 8, Version 0) for information about how the existing regulatory regimes apply to the Project.
RR-219-6	Alternatives	4.2. A reservoir north of Winchester would be a better use of funds, capturing winter rainwater for summer droughts. A desalinisation plant is also a better way to obtain water.	The Applicant's WRMP19 established the need for a new strategic water resource solution to address the significant water supply shortfall in Hampshire and identified desalination as the preferred strategy. As part of the RAPID regulatory process, the Applicant subsequently undertook an extensive options appraisal which selected the Project as the preferred solution over desalination. Informed by WRMP19, the options appraisal considered a range of alternative technologies and solutions, and assessed these against planning, environmental, socio economic and cost criteria. It identified that the desalination proposal would have resulted in likely significant environmental impacts on the New Forest National Park and on the Solent. It also considered a variation of the Project utilising a new buffer lake/reservoir near to its Water Supply Works at Otterbourne, but this would have costed considerably more than the project as it would have required another reservoir in addition to Havant Thicket Reservoir. The water supply deficit facing Hampshire is such that the Project is required not only for drought resilience but also for providing essential daily water supplies in normal weather. The need for the Project and an explanation of the alternatives considered (including alternative technologies) is presented in the DCO submission in the Case for the Project [APP-057] and the Scheme Development Report [APP-073, APP-074, APP-075].
RR-219-7	The Applicant's wider	4.3. We don't think Southern Water can be trusted to remove the chemicals from the human slurry. There track record of falsifying records and deliberate	The Applicant recognises concerns about reputation, particularly in relation to water pollution, fines, asset maintenance and operational performance. The

Reference	Theme	Issue raised	The Applicant's response
	operations and Project interfaces	sewage pollutions, we should be cautious about given them the ability to poison the population. Our limited experience with this project, they have cut corners and been unwilling to property invest or spend money. If this continues it could cause widespread problems.	Applicant has implemented a Turnaround Plan (2023–2025) focused on improving operational performance, reducing pollution incidents and enhancing customer service. Since 2020, pollution incidents have reduced by 38% and leakage has reduced by almost 20% by 2024/25. The Applicant is committed to ongoing investment in its infrastructure and to maintaining high standards of monitoring and maintenance for both existing and new assets. The Project would also be subject to robust control systems and maintenance regimes. The advanced treatment process at the Water Recycling Plant (WRP) would use multiple treatment barriers before blending with the water in the Havant Thicket Reservoir. The water would then undergo final treatment at Otterbourne Water Supply Works (Otterbourne WSW), as described in ES Chapter 3 Description of the Proposed Development [APP-082]. Water going into supply would continue to be required to meet statutory standards for drinking water quality, with oversight by the Drinking Water Inspectorate (DWI). Please refer to RR-219-5 in relation to the efficacy of the water recycling process, and how this will be controlled by the applicable regulatory regime.
RR-219-8	Terrestrial and freshwater biodiversity	5. Ecology & Ground Burrowing Bees 5.1. Over the last 5 to 6 years there has been a colony of ground burrowing bees that arrive in late June early July to inhabit the lower meadow. The sand soil conditions make for a perfect environment. 5.2. I have seen this colony grown in the last 5 to 6 years to inhabit the whole of the lower meadow and parts of the top meadow. As we all know bees are important pollinators and need our help! 5.3. By destroying this habitat, it will kill of the population of ground burrowing bees.	The Applicant recognises the importance of the grassland habitat to terrestrial invertebrate populations, including bee species. It is noted that sections of the grassland habitat will be temporarily impacted for the construction of the Project. However, areas of the grassland referenced are outside of the Order Limits and therefore will remain available for the bee colonies during construction. The Applicant is committed to reinstating all habitats to their pre-construction habitat type and condition. It is expected that the bees would rapidly re-colonise from adjacent unaffected habitat once the work is completed. An assessment of the impacts of the Project on terrestrial invertebrates was included in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1). Details regarding habitat reinstatement are provided in the Outline Landscape and Ecology Management Plan (LEMP; Document reference 7.5, DCO Volume 7, Version 1).
RR-219-9	Landowner engagement	6. Southern Waters Conduct to date 6.1. We have been disappointed in Southern Water's conduct to date. They, via their agents have been rude, incompetent, and threatening at every encounter.	The Applicant does not recognise the accusations levelled at its approach to landowners. The Applicant remains committed to working collaboratively with landowners, as detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and the Land and Rights Negotiations (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with landowners regarding a voluntary agreement. Following the Heads of Terms being issued on 6 March 2026, the Applicant discussed the Heads of Terms with the respondent's representative at a meeting on 13 May 2026. Following this, the Applicant requested a further meeting on 17 July 2026 and, after issuing a proposal for revised terms on 7

Reference	Theme	Issue raised	The Applicant's response
			August 2026 incorporating amended provisions and improved commercial terms, sought an additional meeting with the respondent's agent on 11 September 2026, evidencing the Applicant's attempts to reach a voluntary agreement. A meeting with has been arranged for 1 December 2026 to discuss Heads of Terms and the project generally.
RR-219-10	Consultation	6.2. We took part in the public consultation in 2024 & 2025, yet our concerns have never been taken seriously and have never been addressed. The public consultations were just a formality that Southern Water gave lip-service to.	Section 47 of the PA 2008 is the duty of the Applicant to consult with the local community. The Consultation Report [APP-029] demonstrates conclusively that the Applicant has complied with the requirements of Section 47 of the PA 2008. This was also the view of all seven host local authorities when the Applicant consulted them in preparing the Adequacy of Consultation Milestone submission as part of the pre application procedure and subsequently confirmed through their Adequacy of Consultation Representations. The Planning Inspectorate concurred and the application has now been accepted. As well as undertaking statutory compliant consultations, the Applicant sought to carry out open, inclusive and proportionate pre-application consultation. The Applicant considered the Gunning Principles to make sure that consultation was fair, lawful and a worthwhile exercise for the Applicant and consultees, including landowners. Please see Table 3-1 in the Consultation Report [APP-029] for further detail about how the Applicant had regard to the Gunning Principles. Alongside formal consultation stages, the Applicant undertook ongoing engagement with landowners to inform refinements to the Project and the design of the AGP and pipeline routes. The Applicant has had regard to all feedback, which has informed the design of the Project. The Scheme Development Report [APP-073, APP-074, APP-075] and the Consultation Report [APP-029] set out the process that has been undertaken to design the Project and sets out how feedback from landowners and other stakeholders has been considered. Furthermore, following the Summer 2024 Consultation, the Statutory Consultations were largely focused on design changes that arose from considering feedback from landowners. The Applicant considered matters raised by landowners and reviewed whether alternative designs could mitigate these without introducing any new deliverability, environmental or land related risks or impacts. In the event that an alternative design would increase these risks or impacts, the alternative design may not have been progressed. A meeting with has been arranged for 1 December 2026 to discuss Heads of Terms and the project generally.
RR-219-11	Landowner engagement	6.3. They have been most aggressive, constantly threatening court and legal action, if we do not allow access for surveys. They have entered any form of negation to allow surveys on our terms. 6.4. There is no goodwill between Southern Water and ourselves, given the way we have been treated so far with this project.	During discussions with landowners, the Applicant has acted responsibly in making landowners aware of the statutory alternatives available should voluntary agreements not be reached. In relation to surveys, the use of statutory powers under Section 172 of the Housing and Planning Act 2016 has been referenced in correspondence to ensure the respondent is aware of the

Reference	Theme	Issue raised	The Applicant's response
			statutory powers available but confirms that these would only be relied upon following reasonable attempts to secure access by voluntary agreement.
RR-219-12	Landowner engagement	7. Need for Compulsory Purchase Powers 7.1. The Department for Communities and Local Government, Planning Act 2008, Guidance related to Procedures for the compulsory acquisition of land (CA Guidance), sets out the requirements Acquiring Authorities should meet to be granted CPO powers. 7.2. Para 6. "provides that a development consent order may only authorise compulsory acquisition if the Secretary of State is satisfied that: - the land is required for the development to which the consent relates, or is required to facilitate, or is incidental to, the development". 7.3. Para 8. "The applicant will also need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate"	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance.
RR-219-13	Landowner engagement	7.4. Para 9. "The applicant must have a clear idea of how they intend to use the land which it is proposed to acquire. 7.5. Para 11. Section 122 of the Planning Act sets out two conditions which must be met to the satisfaction of the Secretary of State before compulsory acquisition can be authorised. The first of these is related to the purpose for which compulsory acquisition is sought. These three purposes are set out in section 122(2): (i) the land is required for the development to which the development consent relates. For this to be met, the applicant should be able to demonstrate to the satisfaction of the Secretary of State that the land in question is needed for the development for which consent is sought. The Secretary of State will need to be satisfied that the land to be acquired is no more than is reasonably required for the purposes of the development. (ii) the land is required to facilitate or is incidental to the proposed development. An example might be the acquisition of land for the purposes of landscaping the project. In such a case the Secretary of State will need to be satisfied that the development could only be landscaped to a satisfactory standard if the land in question were to be compulsorily acquired, and that the land to be taken is no more than is reasonably necessary for that purpose, and that is proportionate.	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance. As detailed within the Statement of Reasons [APP-025], temporary possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the project. The Applicant's proposed use of the land is set out in the Works Plans [AS-008] with detail of each Works Number set out in 'Schedule 1 – Authorised Development' to the Draft Development Consent Order [APP-023]. The respondent is affected by 'Works No.4 – Pipeline between the WRP site and Otterbourne WSW' and 'Works No.6 – Construction Compound' for which the Applicant is seeking the acquisition of rights as set out in Sheet 16 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2).

Reference	Theme	Issue raised	The Applicant's response
RR-219-14	Location of the proposed pipeline routes	7.6. We believe that part the land included within the order limits is not necessary to facilitate the scheme and the volume of land taken is not proportionate. 7.7. The Acquiring Authority have not provided any justification for the scale/quantum of the Order Limits. They have stated (Para 3.3.3 Document Reference 4.1) that the maximum working width is 40m. Yet later (para 3.3.1 Document Reference 4.1- please note numbering error in document) the working width may be up to 50m. 7.8. We understand that Southern Water have chosen not to undertake detailed design and want an element of flexibility, this flexibility could be reduced to 20m in width. It is clear that the scale of the Order Limits is significantly more than is reasonably necessary or proportionate for a pipe that 0.8m in width.	The Order Limits provide flexibility for the works to be sited dependent on the position at the time of construction. The detailed design will be developed following approval of the DCO application and the appointment of a Contractor. This approach ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs. The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m for a maximum length of 42m. In accordance with the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition have been met. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits, whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) sets out the maximum diameter of the pipelines for the different Project components, which may be greater than the 800mm referenced by the Respondent. The Applicant considers the permanent rights sought are justified in order to protect and preserve the integrity of the Project.
RR-219-15	Location of the proposed pipeline routes	7.9. We believe the Order Limits should be significantly reduced to a maximum of 20m. If the Acquiring Authority require greater area for unnecessary offsite storage, they can rent commercially available space off site. 7.10. There is nothing within their submission that provides a justification for this excessive width of the order Limits.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide the necessary space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas, and enable safe and efficient construction operations. This is set out at section 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. If part of the required construction storage were to be located off-site, this would significantly increase the duration of construction works and the number of construction vehicle movements on the highway network. Both of

Reference	Theme	Issue raised	The Applicant's response
			these factors would result in adverse impacts on the environment and local communities.
RR-219-16	Location of the proposed pipeline routes	8. Scale of the Working Area 8.1. The justification for the working width is lacking any reality, below is an exact Graphic 3-3 Para 3.5.92 document Reference 6.1.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, which is secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide the necessary space for a haul road, construction working areas, material storage areas, pipeline trench and soil storage areas. This is set out at section 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m, over a distance of a maximum of 42m. The haul road/working area must be a sufficient width to allow a suitably sized excavator to track back at 90 degrees to the pipe to lift it and then lower into the trench. A suitably sized excavator capable of carrying out a tandem lift of a string of pipes would circa 11m long hence the 11m required. The working area for the trench excavation is calculated using the width of the excavator capable of pipeline installation (circa 3.5m) and a 2m deviation of the pipeline route in each direction without compromising the pipelaying process. If the pipeline has to change direction the joints are designed to allow a slight angle deviation to alter the direction this is a gradual process and requires sufficient space to allow for it. Therefore, a total of 7.5m. The pipe storage/jointing area must be wide enough to allow the pipes to be welded together to form the strings before lowering into the trench. As there will be welders working on this while the excavator is operating a 1m safety exclusion zone has to be in place. The total of the pipe storage/jointing area is therefore a total of 3.5m The area required for topsoil storage is based on topsoil being 200mm thick, which equates to $8m^3$ for a 40m working width. With a side slope of 1:1 and maximum height of 1.8m an area of 7m has been allocated which includes for any bulking factor. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The area required for subsoil provides enough width in this area to segregate upper and lower subsoils, therefore there would be two separate mounds, which ensures the subsoil can be reinstated properly. A 1:1 side slope and a bulking factor has been incorporated which equates to 7m. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The above areas equate to a working width of 40m.

Reference	Theme	Issue raised	The Applicant's response
RR-219-17	Location of the proposed pipeline routes	8.2. This has a "Working Area and Haul Road" of 11m and a pipe trench 4m wide. This is excessive, yet only totals 15m in width. They want a further 25m for topsoil and subsoil storage.	Please refer to the Applicant's response to RR-219-16.
RR-219-18	Location of the proposed pipeline routes	8.3. I have undertaken a simple calculation of what may be needed as a working width - The Haul Road may be 3m wide, with occasional passing places, - Working area 8m, this allows 6m of digger working area, plus 2m pipe storage - Pipe width - this will be 1.5m plus say 1.5m each side of pipe = 4.5m - Topsoil Storage - A fair estimate is to assume 150mm of top soil, across 20m equates to 3m³ of top soil, stacked at 1:2, say 2.5m x 1.25m = 3.75m³, therefore 2.5m for topsoil storage. - Sub-soil Storage - If the trench is 4m wide and assume a depth of 2m (2.15m below ground level) deep 7.5m³ of subsoil, again assume 1:2 stack equates to 4m of subsoil storage. - Excess 2m excess for fencing and other uses - Total working area required - 24m in width	Please refer to the Applicant's response to RR-219-16.
RR-219-19	Location of the proposed pipeline routes	8.4. It is completely unjustified, unreasonable and unnecessary for the purpose, and disproportionate to permit a working area greater than 24m in width for open cut sections of pipe	Please refer to the Applicant's response to RR-219-16.
RR-219-20	Landowner engagement	8.5. If Southern Water wish to use additional space this can be done by agreement at a market rent with individual landowners.	The Applicant has been seeking voluntary agreements for all land identified for temporary use. Details of this engagement can be found within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1). As detailed within the Statement of Reasons [APP-025], temporary possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the project. Whilst the Applicant's preference is to reach a voluntary agreement, it considers that the temporary possession powers sought within the DCO are necessary to ensure that the project can be delivered where agreement cannot be reached. Reasonable losses incurred by landowners arising out of the temporary use of land will be reimbursed in line with the Compensation Code. The Applicant therefore considers that the temporary possession powers sought are justified and proportionate, whilst maintaining that a voluntary agreement remains its preferred outcome where possible.

Reference	Theme	Issue raised	The Applicant's response
RR-219-21	Location of the proposed pipeline routes	9. Scale of Easement Width 9.1. We haven't been provided any justification of the easement width restriction. Southern Water requested a 11m easement for open cut, being 5.5m each side of the pipe, with permanent restriction place on this land. Yet for tunnelled section the easement has been reduced to 2.5m each side of the pipe. 9.2. We have assessed other water providers easement width and the typical easement width for an 800mm pipe is 8m total width. 9.3. We have requested justification for this easement width; this hasn't been supplied. We therefore believe this is unreasonable, unjustified and disproportionate and should be reduced.	The purpose of the easement is to protect the integrity and operational requirements of the pipeline and to ensure appropriate access for inspection, maintenance, repair and replacement activities. The required width has been determined following a detailed technical assessment, taking account of the pipeline's diameter, depth, construction methodology, location and operational function. For sections of pipeline installed using open-cut construction, the Applicant is seeking an easement width of 11m (5.5m either side of the pipeline). This reflects the access and operational requirements associated with maintaining and, if necessary, excavating the pipeline in the future. Notably, this represents a reduction from the Applicant's published stand-off guidance for water mains of a comparable size and depth [1], which would typically require a wider protected corridor. This reduction from the normal requirement has been communicated to landowners and their agents where this is being challenged. For sections constructed using trenchless techniques, a reduced easement width is considered appropriate, taking into account depth, construction methodology and location. As the pipeline is installed at greater depth and future maintenance or operational access would be undertaken from either side of the trenchless section rather than directly above it, the same level of restriction is not required. The easement width has therefore been tailored to reflect the differing operational requirements of the construction methodologies. The Applicant is therefore satisfied that the easement widths proposed represent the minimum reasonably required to protect the pipeline and secure its safe operation over its lifetime.
RR-219-22	Landowner engagement	10. Private Negotiations and Alternative to Compulsory Purchase 10.1. We understand that it is not for the planning Inspectorate to comment on the terms of any private negotiated agreements. We must comment that The Applicant have been impossible to work with. They have dictated terms, without giving any consideration to amending the terms. The terms offered are significantly worse that those under compulsory acquisition. 10.2. They are only playing lip-service and have no intention of reaching any form of settlement with Landowners and Occupiers. This is apparent from the Preapplication Land and Rights Negotiation Tracker (Document 4.4) only 1 landowner has returned Heads of Terms out of 172 Category 1 Landowners. The one that has been return is a middle section of a drill section, so no above ground access is needed. 0.58% sign up rate, clearly demonstrates that Southern Water have not made any significant effort to reach agreement with Landowners and Interested Parties and they are relying on taking land by compulsion. 10.3. Not a single Option Agreements have been entered into. 10.4. I believe it is disingenuous to categorize me as Head of Terms negotiation ongoing(yellow status). This is not true, Southern Water have	The Applicant does not recognise the accusations levelled at its approach. The Applicant remains committed to working collaboratively with landowners and disagrees with respondent's suggestion that they have been unwilling to enter into any form of negotiations. The Applicant has made several amendments to the proposed Heads of Terms as confirmed by a relevant representation made by a member of the Land Agent Group [RR-233] and improved the commercial offer during the negotiations to demonstrate this preference. Whilst the Applicant would prefer to be able to advise the Examining Authority of a higher return of signed Heads of Terms, it does not consider this to be because the terms offered to the respondent are unreasonable. To date, despite formally requesting evidence demonstrating why the commercial offer is considered unreasonable on 28 January 2026, the Applicant is yet to receive a response. The Heads of Terms proposed by the Applicant closely align with those adopted across other utilities and infrastructure projects, which have also been reviewed and accepted by respective land agent groups.

Reference	Theme	Issue raised	The Applicant's response
		shown no interest in reaching an agreement with us. I request that my status is amended to Heads of Terms agreements unlikely before close of examination (red).	As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with landowners regarding a voluntary agreement. The Applicant refutes the suggestion that it seeks to rely on statutory powers and confirms its preference to reach a voluntary agreement. The status recorded by the Applicant in the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1) does not indicate that voluntary agreement is agreed. Given that Heads of Terms for a voluntary agreement have been issued and are being discussed with the respondent's representative, the status has been reflected accordingly. Following the Heads of Terms being issued on 6 March 2026, the Applicant discussed the Heads of Terms with the respondent's representative at a meeting on 13 May 2026. Following this, the Applicant requested a further meeting on 17 July 2026 and, after issuing a proposal for revised terms on 7 August 2026 incorporating amended provisions and improved commercial terms, sought an additional meeting with the respondent's agent on 11 September 2026, evidencing the Applicant's attempts to reach a voluntary agreement.
RR-219-23	Land use and agriculture	11. Land Quality 11.1. Our land has deep sandy soils, known as Holiday Hill soil type. Our sand is of building quality and we need an assurance that our sand will remain on our land. 11.2. Our soils are Provisional Agricultural Land Classification Grade 2, the land was historically market garden land, suitable for a wide range of vegetation cropping. 11.3. We believe the scheme should avoid the highest quality agricultural land. There is limited trust that Southern Water will put the soil back to the same condition. 11.4. We also need assurances that our sand will not be taken off of site and used by Southern Water elsewhere on the scheme.	The Applicant confirms in Environmental Statement (ES) Appendix 12.1 Agricultural Land Quality [APP-169] that sandy soils of the Holiday Hill association are identified within the Order Limits. ES Appendix 12.1 Agricultural Land Quality [APP-169] also identifies areas of higher quality agricultural land within the Order Limits and informs the assessment presented in ES Chapter 12 Land use and agriculture [APP-091]. Paragraph B.8.2 of the Outline Soil Resources Management Plan (SRMP), provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), confirms that soil stripped from the pipeline trenches would be placed alongside the pipeline route, within the same holding where possible. The trenches would then be backfilled using the same soils that were excavated, in the correct order, i.e. subsoil first, then topsoil. There are no proposals to remove soils excavated from the pipeline trench for reuse elsewhere within the Project and, where practicable, soils would be stored and reinstated within the same landholding.

Table 2-43 The Applicant's response to RR-221 from Ian Judd and Partners on behalf of Nations Farms Limited

Reference	Theme	Issue raised	The Applicant's response
RR-221-1	Greeting	Please see the support information sent by email 1.Key Information Name of Interest party: [REDCATED]	The Applicant notes this comment.

Reference	Theme	Issue raised	The Applicant's response
		Business Name: Nations Farm Limited Address: Nations Farm, Curdridge Lane, Curdridge, SOUTHAMPTON, SO32 2BH Email Address: [REDCATED]thegamblins@talktalk.net Telephone Number: [REDCATED]	
RR-221-2	Landowner engagement	Name & Address of Property Affected: Land East of Nations Farm Land Plan Reference No: 17-010 17-011 17-012 Area of Acquisition Rights requested: 15362 square metres square metres Area of Temporary Rights Requested: 2572 square metres 295 square metres Linear length of pipe: Approx 167m Use of Land: Agricultural/ Horticultural Land- Land in Nursery Stocks Land Agent Instructed: Ian Judd and Partners, 4 High Street, Bishops Waltham, Southampton, Hampshire, SO32 1AB [REDCATED]@ianjuddandpartners.co.uk	The Applicant notes this comment.
RR-221-3	Principle of development	2. Summary of Submission 2.1. I wish to become an interested party and submit my strongest objection to the Development Consent Order Application.	The Applicant notes this comment.
RR-221-4	Land use and agriculture	3. Land Use 3.1. I own, with my brother, approximately 56.25 acres (22.76 hectares) of land at Nations Farm, Curdridge Lane. The land is Grade 2 horticultural land, used for the growing of trees and nursery stocks. The soils are sandy loams, which allows the lifting of root stocks during the winter months.	The Applicant notes that Nations Farm comprises approximately 56.25 acres (22.76 hectares) of Grade 2 agricultural land used for the cultivation of trees and nursery stock. The Applicant also notes the importance of the sandy loam soils to the operation of the holding, including their suitability for lifting rootstocks during the winter months. Environmental Statement (ES) Chapter 12 Land Use and Agriculture [APP-091] considers the potential effects of both temporary and permanent loss of agricultural land arising from the Project. The assessment identifies Grade 2 agricultural land as Best and Most Versatile (BMV) agricultural land and assigns it a very high sensitivity. The assessment concludes that temporary removal of substantial areas of Grade 1 and Grade 2 agricultural land from production during construction would result in a temporary, short-term, moderate adverse effect which is significant. Permanent loss of Grade 2 agricultural land is assessed as resulting in a permanent, moderate adverse effect which is also significant.

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			Most of the effects would be temporary and arise from the installation of the Pipelines by open-cut trench construction, as well as the temporary construction compound, during which time land within the Order Limits would be taken out of agricultural production and use. Following installation and completion of construction, the land would be restored to its pre-existing agricultural use using the same soils in the same locations from which they would have been excavated, as set out in the Outline SRMP appended to the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). The Applicant will continue to engage with affected landowners to minimise disruption to agricultural operations where reasonably practicable.
RR-221-5	Landowner engagement	4. Southern Waters Conduct to date 4.1. We have been disappointed in Southern Waters conduct to date. They, via their agents, have provided inadequate engagement with landowners. I don't think there has been a single site meeting. I don't believe any engineers have viewed the land to understand its constraint.	The Applicant does not recognise the accusations levelled at its approach to landowners. The Applicant confirms that a meeting with the Applicant's respondent was undertaken on site on Tuesday 16 of April 2024, where the land was visited and discussions held regarding the Project proposals. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with the respondent regarding a voluntary agreement. Following the Heads of Terms being issued on 6 March 2026 the Applicant discussed the Heads of Terms with the respondent's representative at a meeting on 13 May 2026. Following this, the Applicant requested a further meeting on 17 July 2026 and, after issuing a letter proposing revised Heads of Terms on 7 August 2026 incorporating amended provisions and improved commercial terms, sought an additional meeting with the respondent's agent on 11 September 2026. A meeting has been arranged with the respondent on 8 December 2026, evidencing the Applicant's continued attempts to reach a voluntary agreement.
RR-221-6	Consultation	4.2. We took part in the public consultation in 2024 & 2025, yet our concerns have never been taken seriously and have never been addressed. The public consultations were just a formality that Southern Water gave lip-service to.	Section 47 of the PA 2008 is the duty of the Applicant to consult with the local community. The Consultation Report [APP-029] demonstrates conclusively that the Applicant has complied with the requirements of Section 47 of the PA 2008. This was also the view of all seven host local authorities when the Applicant consulted them in preparing the Adequacy of Consultation Milestone submission as part of the pre application procedure and subsequently confirmed through their Adequacy of Consultation Representations. The Planning Inspectorate concurred and the application has now been accepted. As well as undertaking statutory compliant consultations, the Applicant sought to carry out open, inclusive and proportionate pre-application consultation. The Applicant considered the Gunning Principles to make sure that consultation was fair, lawful and a worthwhile exercise for the Applicant and consultees, including landowners. Please see Table 3-1 in the Consultation Report [APP-029] for further detail about how the Applicant had regard to the Gunning Principles. Alongside formal consultation stages, the Applicant undertook

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			ongoing engagement with landowners to inform refinements to the Project and the design of the AGP and pipeline routes. The Applicant has had regard to all feedback, which has informed the design of the Project. The Scheme Development Report [APP-073, APP-074, APP-075] and the Consultation Report [APP-029] set out the process that has been undertaken to design the Project and sets out how feedback from landowners and other stakeholders has been considered. Furthermore, following the Summer 2024 Consultation, the Statutory Consultations were largely focused on design changes that arose from considering feedback from landowners. The Applicant considered matters raised by landowners and reviewed whether alternative designs could mitigate these without introducing any new deliverability, environmental or land related risks or impacts. In the event that an alternative design would increase these risks or impacts, the alternative design may not have been progressed. A meeting is scheduled for 8 December 2026 to discuss heads of terms and the project generally.
RR-221-7	Landowner engagement	4.3. Southern Waters communication has been poor, they haven't listened, they have been most aggressive, constantly threatening compulsory acquisition or court and legal action, if we do not allow access. They haven't entered any form of negation to allow surveys on our terms, the choice was: accept their dictated position or they would get a Statutory Notice or court order. This is not how to work with landowners. 4.4. There has been inadequate engagement with Landowners to truly understand landowner's concerns and there has been a failure to negotiate constructively.	The Applicant does not recognise the accusations levelled at its approach to landowners. During discussions with landowners, the Applicant has acted responsibly in making landowners aware of the statutory alternatives available, should voluntary agreements not be reached. In relation to surveys, the use of statutory powers under Section 172 of the Housing and Planning Act 2016 has been referenced in correspondence to ensure the respondent is aware of the statutory powers available but the Applicant confirmed that these would only be relied upon following reasonable attempts to secure access by voluntary agreement. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with the respondent regarding a voluntary agreement. Following the Heads of Terms being issued on 6 March 2026 the Applicant discussed the Heads of Terms with the respondent's representative at a meeting on 13 May 2026. Following this, the Applicant requested a further meeting on 17 July 2026 and, after issuing a letter proposing revised Heads of Terms on 7 August 2026 incorporating amended provisions and improved commercial terms, sought an additional meeting with the respondent's agent on 11 September 2026, evidencing the Applicant's attempts to reach a voluntary agreement. Since the commencement of negotiations of Heads of Terms, the Applicant has made several amendments to the proposed Heads of Terms as confirmed by a relevant representation made by a member of the Land Agent Group [RR-233] and improved the commercial offer during the negotiations to demonstrate this preference.

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			A meeting is scheduled with the respondent on 8 December 2026 to discuss Heads of Terms and the Project further.
RR-221-8	Land use and agriculture	5. Soils 5.1. My land is classified by the Provisional Agricultural Land Classification as Grade 2 soils. The scheme should avoid prime agricultural land. 5.2. The soils are sandy loams, suited to vegetable and high value cropping. The proposed pipeline will remove the ability to grow root stocks, trees or other high value crops. 5.3. The potential to mix subsoil and topsoil, could have permanent impact on the ability to farm the soils. We request that Southern Water fund an independent expert to undertake a detailed soil analysis before access is taken and after the scheme is completed to allow a genuine comparison of soil conditions. 5.4. To the south of the land is a water meadow, which is highly sensitive habitat. It is very wet during the winter, so much so that it would be impossible to drive across it with a tractor.	Environmental Statement (ES) Appendix 12.1 Agricultural Land Quality [APP-169] identifies and characterises seven soil types throughout the Order Limits based on the analysis of 90 soil samples. Due to the temporary, short-term and very localised nature of disturbance to soils for the installation of the pipeline, a detailed pre-construction survey was not undertaken. However, the Outline Soil Resources Management Plan (SRMP) provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) notes at paragraph B.2.16 that the Agricultural Liaison Officer (ALO) will be responsible for undertaking and preparing a Record of Condition to capture the condition of the land prior to commencement of construction to facilitate pre- and post-construction comparison. A detailed SRMP will be in effect for the duration of the construction and operation phases of the Project. As indicated in the Outline SRMP provided at Appendix B of the Outline CEMP) (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), good practice measures for handling soils include soil suitability criteria for handling (including trafficking), as well as reinstatement of soils over the pipeline in the correct order, such that there will be minimal mixing of topsoil and subsoil resources. The land will be reinstated as soon as practicable and in agreement with the landowner, to its original land quality.
RR-221-9	Landowner engagement	6. Need for Compulsory Purchase Powers 6.1. The Department for Communities and Local Government, Planning Act 2008, Guidance related to Procedures for the compulsory acquisition of land (CA Guidance), sets out the requirements Acquiring Authorities should meet to be granted CPO powers. 6.2. Para 6. provides that a development consent order may only authorise compulsory acquisition if the Secretary of State is satisfied that: - the land is required for the development to which the consent relates, or is required to facilitate, or is incidental to, the development. 6.3. Para 8. The applicant will also need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent a. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long

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			period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-221-10	Landowner engagement	6.4. Para 9. The applicant must have a clear idea of how they intend to use the land which it is proposed to acquire. 6.5. Para 11. Section 122 of the Planning Act sets out two conditions which must be met to the satisfaction of the Secretary of State before compulsory acquisition can be authorised. The first of these is related to the purpose for which compulsory acquisition is sought. These three purposes are set out in section 122(2): (i) the land is required for the development to which the development consent relates. For this to be met, the applicant should be able to demonstrate to the satisfaction of the Secretary of State that the land in question is needed for the development for which consent is sought. The Secretary of State will need to be satisfied that the land to be acquired is no more than is reasonably required for the purposes of the development. (ii) the land is required to facilitate or is incidental to the proposed development. An example might be the acquisition of land for the purposes of landscaping the project. In such a case the Secretary of State will need to be satisfied that the development could only be landscaped to a satisfactory standard if the land in question were to be compulsorily acquired, and that the land to be taken is no more than is reasonably necessary for that purpose, and that is proportionate.	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance. The Applicant's proposed use of the land is set out in the Works Plans [AS-008] with detail of each Works Number set out in 'Schedule 1 – Authorised Development' to the Draft Development Consent Order [APP-023]. The respondent is affected by 'Works No.4 – Pipeline between the WRP site and Otterbourne WSW' and 'Works No.6 - Construction Compound' for which the Applicant is seeking the acquisition of rights as set out in Sheet 17 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2).
RR-221-11	Location of the proposed pipeline routes	6.6. We believe that part of the land included within the order limits is not necessary to facilitate the scheme and the volume of land taken is not proportionate to the needs of the project. 6.7. On our property the order limits extending to 4.5 acres for 167 linear meters of pipe, which equates to an average of 109.14m in width, with a maximum width of around 135m. 6.8. The Acquiring Authority have not provided any justification for the scale/quantum of the Order Limits. They have stated (Para 3.3.3 Document Reference 4.1) that the maximum working width is 40m. Yet later (para 3.3.1 Document Reference 4.1- please note numbering error in document) the working width may be up to 50m. 6.9. We understand that Southern Water have chosen not to undertake detailed design and want an element of flexibility. It is clear that the scale of the Order Limits are significantly more than is reasonably necessary or proportionate for a pipe that 0.8m in width.	The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project and as set out in RR-221-10 the Applicant is aware of the compulsory acquisition requirements under Section 122 of the Planning Act 2008. The design of the Project as set out in the DCO application provides flexibility for refinement informed by further surveys and investigations at the detailed design stage. The detailed design will be developed following approval of the DCO application and the appointment of a Contractor. This approach ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs. The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP

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			(Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m for a maximum length of 42m. In accordance with the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition have been met. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits, whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) sets out the maximum diameter of the pipelines for the different Project components, which may be greater than the 800mm referenced by the Respondent. The Applicant considers the permanent rights sought are justified in order to protect and preserve the integrity of the Project.
RR-221-12	Location of the proposed pipeline routes	6.10. We believe the Order Limits should be significantly reduced to a maximum of 20m. 6.11. A huge amount of Southern Waters flexibility is due to the fact that they haven't undertaken detailed design of the pipe, due to the cost and uncertainty. However, this adds significantly greater uncertainty for the landowners. I believe the DCO should be put on hold/refused until the detailed design has been completed, giving Southern Water and Landowners confidence the land to be taken is no more than is reasonably necessary for that purpose, and that is proportionate. 6.12. If the Acquiring Authority require greater area for unnecessary offsite storage. They can rent commercially available space off site. It is unreasonable to use compulsory purchase rights to take peoples land (without payment of rent), if they can rent storages spaces locally or even from the landowners at commercial terms. 6.13. There is nothing within their submission that provides a justification for this excessive width of the order Limits.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide the necessary space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas, and enable safe and efficient construction operations. This is set out at section 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The design of the Project as set out in the DCO application provides flexibility for refinement informed by further surveys and investigations at the detailed design stage. The detailed design will be developed following approval of the DCO application and the appointment of a Contractor. This approach ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs. Given the urgent need to implement the Project to ensure future water supplies in Hampshire, it would not be feasible to delay the DCO application until after all surveys and detailed design has been undertaken. This would significantly delay the implementation of the Project. As set out above, the approach to flexibility is required by the procurement approach for the Project, which is determined by the Water Services Regulation Authority (Ofwat).

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			If part of the required construction storage were to be located off-site, this would significantly increase the duration of construction works and the number of construction vehicle movements on the highway network. Both of these factors would result in adverse impacts on the environment and local communities.
RR-221-13	Location of the proposed pipeline routes	7. Scale of the Working Area 7.1. The justification for the working width is lacking any reality, below is an exact Graphic 3-3 Para 3.5.92 document Reference 6.1.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, which is secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide the necessary space for a haul road, construction working areas, material storage areas, pipeline trench and soil storage areas. This is set out at section 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m, over a distance of a maximum of 42m. The haul road/working area must be a sufficient width to allow a suitably sized excavator to track back at 90 degrees to the pipe to lift it and then lower into the trench. A suitably sized excavator capable of carrying out a tandem lift of a string of pipes would circa 11m long hence the 11m required. The working area for the trench excavation is calculated using the width of the excavator capable of pipeline installation (circa 3.5m) and a 2m deviation of the pipeline route in each direction without compromising the pipelaying process. If the pipeline has to change direction the joints are designed to allow a slight angle deviation to alter the direction this is a gradual process and requires sufficient space to allow for it. Therefore, a total of 7.5m. The pipe storage/jointing area must be wide enough to allow the pipes to be welded together to form the strings before lowering into the trench. As there will be welders working on this while the excavator is operating a 1m safety exclusion zone has to be in place. The total of the pipe storage/jointing area is therefore a total of 3.5m The area required for topsoil storage is based on topsoil being 200mm thick, which equates to $8m^3$ for a 40m working width. With a side slope of 1:1 and maximum height of 1.8m an area of 7m has been allocated which includes for any bulking factor. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The area required for subsoil provides enough width in this area to segregate upper and lower subsoils, therefore there would be two separate mounds, which ensures the subsoil can be reinstated properly. A 1:1 side slope and a bulking factor has been incorporated which equates to 7m. Either side of the

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			stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The above areas equate to a working width of 40m.
RR-221-14	Location of the proposed pipeline routes	7.2. This has a "Working Area and Haul Road" of 11m and a pipe trench 4m wide. This is excessive, yet only totals 15m in width. They want a further 25m for topsoil and subsoil storage.	Please refer to the Applicant's response to RR-221-13.
RR-221-15	Location of the proposed pipeline routes	7.3. I have undertaken a simple calculation of what may be needed as a working width - The Haul Road may be 3m wide, with occasional passing places, - Working area 8m, this allows 6m of digger working area, plus 2m pipe storage - Pipe width - this will be 1.5m plus say 1.5m each side of pipe = 4.5m - Topsoil Storage - A fair estimate is to assume 150mm of top soil, across 20m equates to 3m³ of top soil, stacked at 1:2, say 2.5m x 1.25m = 3.75m³ therefore 2.5m for topsoil storage. - Sub-soil Storage - If the trench is 4m wide and assume a depth of 2m (2.15m below ground level) deep 7.5m³of subsoil, again assume 1:2 stack equates to 4m of subsoil storage. - Excess 2m excess for fencing and other uses - Total working area required - 24m in width	Please refer to the Applicant's response to RR-221-13.
RR-221-16	Location of the proposed pipeline routes	7.4. It is completely unjustified, unreasonable and unnecessary for the purpose, and disproportionate to permit a working area greater than 24m in width for open cut sections of pipe	Please refer to the Applicant's response to RR-221-13.
RR-221-17	Landowner engagement	7.5. If Southern Water wish to use additional space this can be done by agreement at a market rent with individual landowners.	The Applicant has been seeking voluntary agreements for all land identified for temporary possession. Details of this engagement can be found within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1). As detailed within the Statement of Reasons [APP-025], temporary possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the Project. Whilst the Applicant's preference is to reach a voluntary agreement, it considers that the temporary possession powers sought within the DCO are necessary to ensure that the Project can be delivered where agreement cannot be reached. Reasonable losses incurred by landowners arising out of the temporary use of land will be reimbursed in line with the Compensation Code.

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			The Applicant therefore considers that the temporary possession powers sought are justified and proportionate, whilst maintaining that a voluntary agreement remains its preferred outcome where possible.
RR-221-18	Location of the proposed pipeline routes	8. Scale of Easement Width 8.1. We haven't been provided any justification of the easement width restriction. Southern Water requested a 11m easement for open cut, being 5.5m each side of the pipe, with permanent restriction place on this land. Yet for tunnelled section the easement has been reduced to 2.5m each side of the pipe. 8.2. We have assessed other water providers easement width and the typical easement width for an 800mm pipe is 8m total width. 8.3. We have requested justification for this easement width; this hasn't been supplied. We therefore believe this is unreasonable, unjustified and disproportionate and should be reduced.	The purpose of the easement is to protect the integrity and operational requirements of the pipeline and to ensure appropriate access for inspection, maintenance, repair and replacement activities. The required width has been determined following a detailed technical assessment, taking account of the pipeline's diameter, depth, construction methodology, location and operational function. For sections of pipeline installed using open-cut construction, the Applicant is seeking an easement width of 11m (5.5m either side of the pipeline). This reflects the access and operational requirements associated with maintaining and, if necessary, excavating the pipeline in the future. Notably, this represents a reduction from the Applicant's published stand-off guidance for water mains of a comparable size and depth [1], which would typically require a wider protected corridor. This reduction from the normal requirement has been communicated to landowners and their agents where this is being challenged. For sections constructed using trenchless techniques, a reduced easement width is considered appropriate, taking into account depth, construction methodology and location. As the pipeline is installed at greater depth and future maintenance or operational access would be undertaken from either side of the trenchless section rather than directly above it, the same level of restriction is not required. The easement width has therefore been tailored to reflect the differing operational requirements of the construction methodologies. The Applicant is therefore satisfied that the easement widths proposed represent the minimum reasonably required to protect the pipeline and secure its safe operation over its lifetime.
RR-221-19	Construction compound locations	9. Scale of Compounds 9.1. The scale of the Site Compound is unreasonable, 2ha for a site compound is vast and will be a significant visual impact during the construction. 9.2. There is no justification why Southern Water cannot occupy a commercial yard, adjacent to major road network (M3 or M27) and store all of their equipment and pipes until they are needed on site.	Construction compound J-2 would comprise office buildings for up to approximately 20 construction employees, welfare facilities, parking spaces for approximately 50 vehicles, and storage areas. The construction compound would support construction of the Pipeline from St Annes Lane to Botley Road (B3035). If part of the required construction storage were to be located off-site, this would significantly increase the duration of construction works and the number of construction vehicle movements on the highway network. Both of these factors would result in adverse impacts on the environment and local communities. The likely landscape and visual effects of the Project are assessed in ES Chapter 13 Landscape and visual [APP-092]. The assessment identifies significant landscape effects during construction associated with the temporary presence of the compounds and related construction activities. The two construction compounds on either side of Botley Road would facilitate the

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			trenchless crossing of the River Hamble and Botley Road, avoiding permanent long-term landscape and visual impacts, including vegetation loss. Following completion of the works, the compounds would be removed and the land reinstated in accordance with the Outline Landscape and Ecology Management Plan [APP-420]. While significant effects would remain at Year 1 of operation due to vegetation loss, effects would reduce over time as mitigation planting establishes. By year 15 of operation, residual landscape effects would not be significant.
RR-221-20	Construction compound locations	9.3. Graphic 3-11 in document reference 6.1, demonstrates a fast 2ha compound. There is unlikely to be a need to have 40m x 100m of pipe storage at each compound. The pipes can be brought from the main compound. Items 01-06 can be re-arranged into a much smaller space, say 20 x 20m of space. 9.4. 50 car parking spaces at each compound is unnecessary additional traffic, all working should congregate at central point adjacent to major transport hubs (Eastleigh train station or M27) and then be mini-bused to site. Whilst 10 parking spaces may be necessary, this should be outside the area that is taken by compulsory purchase.	Construction compound J-2 is proposed to act as a main compound for this section of the Pipeline. Within construction compound J-2, pipes would be stored in a way that allows for efficient and safe access. Other material will also need to be stored in the construction compound. Detail on the construction compounds (including parking) is outlined in ES Chapter 3 Description of the Proposed Development [APP-082] under section 3.5.129 onwards. Graphic 3-11 highlights the amount of storage necessary for pipelines which shows 5No. 14m x 26m storage areas for both pipelines and fittings. Whilst this indicative plan represents a typical construction compound, individual compound construction and design will be refined further in later design stages for discrete construction locations. If part of the required construction storage were to be located off-site, this would significantly increase the duration of construction works and the number of construction vehicle movements on the highway network. Both of these factors would result in adverse impacts on the environment and local communities. As per preliminary design principle PDP_1 (see the Design Approach Document 1 of 3 documents [APP-077]), the Applicant has taken the approach to minimise land take, whilst ensuring sufficient space and access for efficient construction and operation, through route and site selection and optimising site layouts. The Scheme Development Report - 1 of 3 documents [APP-073], section 5.10, sets out the process undertaken to identify and assess compound locations, including the consideration of topography, ground conditions, and existing land uses. The suitability of each compound site has been reviewed in consultation with technical specialists, and mitigation measures will be incorporated where necessary to ensure safe and stable construction. Further, Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3), which sets out the measures that will be implemented to avoid and reduce environmental impacts, including to vegetation. ES Chapter 3 Description of the Proposed Development [APP-082] sets out that parking spaces for approximately 50 vehicles may be required at sectional site compounds such as construction compound J-2. The Framework Construction Worker Travel Plan (appended to the Framework Construction Traffic Management Plan [APP-415]) includes measures proposed to reduce the proportion of construction worker trips made by car.

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			Specific car parking requirements for each compound will be set out in the detailed Construction Worker Travel Plan(s) following the appointment of the Contractor.
RR-221-21	Construction compound locations	9.5. Curdridge Lane cannot cope with this volume of traffic.	The ES Appendix 18.1 Transport Assessment [APP-186 to APP-188 – 3 documents] includes an assessment of the construction traffic impacts of the Project on the local highway network in the development and network peaks, including Curdridge Lane. The assessment concludes that with the measures included in the Framework Construction Traffic Management Plan [APP-415] and appended Framework Construction Worker Travel Plan, there would be no significant traffic impacts on Curdridge Lane.
RR-221-22	Construction compound locations	9.6. If a small compound is needed, it should be excluded from compulsory purchase and occupied on a licence agreement paying a commercial rent. 9.7. We do not believe that Southern Water have provided sufficient justification for the proportionality or need for compounds of this scale.	Please refer to the Applicant's response to RR-221-7 and RR-221-17. As set out at RR-221-20, construction compound J-2 would act as a sectional site compound for this section of the Pipeline. The construction compound would comprise office buildings for up to approximately 20 construction employees, welfare facilities, parking spaces for approximately 50 vehicles, and storage areas.
RR-221-23	Landowner engagement	10. Private Negotiations and Alternative to Compulsory Purchase 10.1. We understand that it is not for the planning Inspectorate to comment on the terms of any private negotiated agreements. We must comment that Southern Water have been impossible to work with. They have dictated terms, without giving any consideration to amending the terms. The terms offered are significantly worse that those under compulsory acquisition. 10.2. Paragraph 25. of CA Guidance states "Applicants should seek to acquire land by negotiation wherever practicable. As a general rule, authority to acquire land compulsorily should only be sought as part of an order granting development consent if attempts to acquire by agreement fail". 10.3. Southern Water are only playing lip-service and have no intention of reaching any form of settlement with Landowners and Occupiers. Their only intent is to use excessive CPO powers, as they deem this easier and cheaper than reaching private agreements.	The Applicant refutes the respondent's comments on the approach taken to the negotiation of voluntary agreements. In reference to the commercial terms offered, the Applicant does not consider the offer to put the respondent in a worse position than under compulsory acquisition. The Applicant formally requested evidence from the respondent's land agent on 28 January 2026 substantiating such a claim but is yet to receive a substantive response from the respondent's land agent. The Heads of Terms proposed by the Applicant closely align with those adopted across other utilities and infrastructure projects, which have also been reviewed and accepted by respective land agent groups. The Applicant refutes the suggestion that it seeks to rely on statutory powers and confirms its preference to reach a voluntary agreement. The Applicant has made several amendments to the proposed Heads of Terms as confirmed by a relevant representation made by a member of the Land Agent Gorup [RR-233] and improved the commercial offer during the negotiations to demonstrate this preference.
RR-221-24	Landowner engagement	10.4. This is apparent from the Pre-application Land and Rights Negotiation Tracker (Document 4.4) only 1 landowner has returned Heads of Terms out of 172 Category 1 Landowners. The one that has been return is a middle section of a drill section, so no above ground access is needed. 0.58% sign up rate, clearly demonstrates that Southern Water have not made any significant effort to reach agreement with Landowners and Interested Parties and they are relying on taking land by compulsion. Not a single Option Agreement has been entered into.	Whilst the Applicant would prefer to be able to advise the Examining Authority of a higher return of signed Heads of Terms, it does not consider this to be because the terms offered to the respondent are unreasonable. To date, despite formally requesting evidence demonstrating why the commercial offer is considered unreasonable on 28 January 2026, the Applicant is yet to receive a response. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document

Reference	Theme	Issue raised	The Applicant's response
		10.5. I believe it is disingenuous to categorize me as Head of Terms negotiation ongoing (yellow status). This is not true, Southern Water have shown no interest in reaching an agreement with us. I request that my status is amended to Heads of Terms agreements unlikely before close of examination (red). 10.6. We do not believe that Southern Water should be granted CPO Powers, as they have not sufficiently exhausted trying to reach agreement on voluntary terms. We think the DCO should be put on-hold until 90% of landowners have reached a voluntary agreement.	reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with landowners and their professional advisors regarding a voluntary agreement. The status recorded for the respondent by the Applicant in the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1) does not indicate that voluntary agreement is agreed. Given that Heads of Terms for a voluntary agreement have been issued and continue to be discussed with the respondent's representative, the status is considered correct. Following the Heads of Terms being issued on 6 March 2026 the respondent's representative wrote to the Applicant confirming that the respondent rejected the terms and did not wish to have a meeting. Subsequently, the Applicant discussed the Heads of Terms with the respondent's representative at a meeting on 13 May 2026. Following this, the Applicant requested a further meeting on 17 July 2026 and, after issuing a letter proposing revised Heads of Terms on 7 August 2026 incorporating amended provisions and improved commercial terms, sought an additional meeting with the respondent's agent on 11 September 2026. The Applicant has arranged a meeting with the respondent on 8 December 2026, evidencing the Applicant's attempts to reach a voluntary agreement.
RR-221-25	Construction impacts and effects	11. Land drainage 11.1. We have land drainage on the farm, being old clay tiled drains. We need reassurance that the drains are property reinstated. 11.2. There are several high flow rate drains leading from the public highway onto the land. These will need to be managed by Southern Water otherwise the site will flood.	The Applicant recognises the importance of maintaining effective land drainage to support existing agricultural operations and land management. Prior to construction, surveys would be undertaken, where necessary, to identify existing drainage infrastructure that may be affected by the Project. Where construction activities intersect with existing land drains, appropriate measures would be implemented to maintain drainage functionality during construction and to reinstate or replace affected drainage systems following completion of the works, as described in ES Chapter 12 Land use and agriculture [APP-091]. The Applicant also notes the representation regarding high-flow drains conveying water from the public highway onto adjacent land. Surface water and drainage considerations have informed the indicative design and assessment of the Project, including flood risk and drainage strategies prepared as part of the Application. Relevant drainage and flood risk matters have been considered within ES Appendix 19.1 Flood Risk Assessment [APP-189 to APP-196 - 8 documents]. During detailed design and construction planning, the Applicant would continue to engage with affected landowners and the relevant highways authority to understand the location and function of existing drainage features and to agree appropriate reinstatement measures where drainage systems are impacted by the authorised works. The Applicant is committed to restoring land affected by temporary construction activities in accordance with ES Chapter 12 Land use and agriculture [APP-091], as secured through the DCO process.

Reference	Theme	Issue raised	The Applicant's response
			Further information on flood risk, drainage management and construction mitigation measures is provided within the application documents, including ES Appendix 19.1 Flood Risk Assessment [APP-189 to APP-196 - 8 documents] and the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3).
RR-221-26	Principle of development	12. Conclusion 12.1. For the reasons set out above, I maintain my strongest objection to the Development Consent Order as currently proposed. Southern Water has not demonstrated that the compulsory acquisition powers sought are necessary, proportionate, or limited to the minimum land reasonably required. The order limits, working widths, easement widths and compound areas are excessive and inadequately justified, particularly given the absence of detailed design and the availability of alternative routes, reduced working areas and commercial off-site storage options.	The Applicant notes this comment and refers the respondent to the Applicant's previous responses to RR-221-6, RR-221-9, RR-221-11, RR-221-12 RR-221-13, RR-221-17, RR-221-18, RR-221-19, RR-221-20.
RR-221-27	Land use and agriculture	12.2. The scheme would cause significant and unnecessary impacts on my agricultural land, including disruption to hay production, risks to soil structure and drainage, potential erosion of sandy ground, impacts on waterlogged areas, and disturbance to a historically important World War II aircraft crash site. These matters have not been properly addressed in the application, nor has Southern Water engaged constructively with me as landowner and occupier. 12.3. I therefore request that the Examining Authority and Secretary of State refuse the compulsory acquisition powers sought in relation to my land or alternatively defer the application until Southern Water has completed detailed design, properly assessed alternative routes, reduced the land take to what is strictly necessary, and entered into genuine negotiations with affected landowners on reasonable voluntary terms.	The Outline Soil Resources Management Plan (SRMP) provided at Appendix B of the Outline CEMP – 1 of 3 documents [APP-412] and secured by Requirement 6 of the Draft DCO [APP-023] notes that reinstatement of soils over the pipeline will be undertaken as soon as practicable after installation, and that the timing and management of reinstatement will be agreed with the landowner. Disruption to agricultural land and agricultural workings will be minimised. All soil handling will be subject to the good practice measures set out in the Outline SRMP, to be further developed in the detailed SRMP which will be produced pre-commencement of construction works by the lead contractor. Risks to soil structure and soil drainage will be avoided or minimised, and any defects identified post-construction will be ameliorated. The Applicant confirms that there are no known aircraft crash sites at Nations Farm and that this statement was confirmed as a template error in correspondence with the respondent's land agent

Table 2-44 The Applicant's response to RR-233 from Paul Harris

Reference	Theme	Issue raised	The Applicant's response
RR-233-1	Landowner engagement	I am a Rural Practice Chartered Surveyor / Land Agent based in Bishop's Waltham who is currently representing a total of 28 Landowners who are directly impacted by the proposed pipeline scheme. Those Landowners are: • Mrs Edna Merritt • Mrs Brenda Byrne	The Applicant notes this comment.

Reference	Theme	Issue raised	The Applicant's response
		• Mrs Pauline Lutman • Mrs Susan Mason • Mrs Carolyn Balfour, Mr James Balfour & Execs of Mr Colin Balfour and Mrs Prudence Balfour • Messrs Michael & Colin Hicks and Mrs Clive Stone • Mrs Carol Colasanti, Mr Luke Colasanti and Mr Mark Colasanti • Mr Morris Emery & Mrs Edward Emery • Mrs Dawn Broomfield • Mr Phillip Ambrose and Mrs Susan Ambrose • Tracy Alani, Vikki Chambers, Elaine Kerwood, Keith Kerwood and Scott Kerwood • The Incumbent and Churchwardens of the Benefice of Durley in the County of Hampshire and Diocese of Portsmouth and his Successors • Blanchard Properties (Southern) Limited • Mr Mark Gregory • Mrs Brenda Hall • Mrs Brenda Kirby and Mr Martyn Kirby • Mr Paul Edwards • Mrs David Gwynn & Ms. Karina Bell • Mr Paul Gledhill and Mrs Emma Gledhill • Mrs Margaret Luckins • Mr James Poulton • Sippdeal Trustees Ltd and Mr James Poulton • Mr Frenny Pickett • Mrs David West and Mr Robert West • Otterbourne Farm Limited • Mr Henry Russell and Mr Paul Butler • Mr Steven Rowlerson and Ms Linda Brady • Ms J Jamieson and Ms K Stokes (Execs of the Estate of the late Mrs Patricia Madsen)	

Reference	Theme	Issue raised	The Applicant's response
RR-233-2	Consultation	I have been involved with Southern Water's Hampshire Water Treatment and Water Recycling Project since March 2022 and have been liaising closely with Southern Water's agents (initially Fisher German and more recently/currently with Dalcour Maclaren) since that time on behalf of my aforementioned clients. For a number of the aforementioned landowners and as per their specific instructions, we prepared and submitted consultation responses/objections as part of the Summer 2024 consultation. Generally these representations raised questions/objections about the following: • The proposed route of the pipeline • Impact of scheme on income and management of property (during works) • Longer term impact of pipeline easement on future development of the property and the detrimental impact on the value of the property Within the same consultation responses, compromised route amendments were offered/suggested along with easement width (to minimise impact of sterilised area) and working width (to minimise impact of scheme on property/business during works) reductions.	The Consultation Report [APP-029] sets out the pre-application consultation activities undertaken for the Project, comprising both non-statutory and statutory consultation. The consideration of relevant responses received to consultation and publicity has been set out in the following locations: • Summer 2024 Consultation o Section 9.7 of the Consultation Report [APP-029]; and o Appendix F.29 (The Applicant's response to feedback) [APP-047] • Spring 2025 Consultation o Section 10.7 of the Consultation Report [APP-029]; and o Appendix G.25 (The Applicant's response to feedback) [APP-050] • Autumn 2025 Consultation o Section 11.7 of the Consultation Report [APP-029]; and o Appendix H.9 (The Applicant's response to feedback) [APP-051] • Spring 2026 Consultations o Section 12.7 of the Consultation Report [APP-029]; and o Appendix I.13 (The Applicant's response to feedback) [APP-052]
RR-233-3	Landowner engagement	Following the submission of these representations in the Summer of 2024, my clients only received individual responses to their comments/objections in December 2025 via a scheme update letter. Southern Water's responses to these suggestions/objections were generic in their format and simply stated that their feasibility were assessed in light of "hydraulic, engineering, land and environmental constraints". Many of my clients were dissatisfied with these generic responses as it was felt that they did not give adequate reasoning as to why their route amendments were not accepted or even considered.	The Applicant notes the respondent's comments regarding engagement during the development of the Project, however as detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken extensive engagement with landowners and considered all feedback provided throughout statutory and non-statutory consultation. The Applicant has sought to provide information on the Project as it has evolved and has considered feedback received from affected parties when refining the design. The Applicant acknowledges that, in the case of this respondent, the requested information was not provided in a timely manner. This was due to the need to coordinate input from a number of disciplines across the Project and to undertake the necessary review and sign-off process prior to issuing the information. The Applicant has subsequently engaged further with the respondent on a number of occasions, with most recent telephone calls between the Applicant's representatives and the respondent taking place on the 6 October 2026 and the 9 October 2026. Route selection and design development have been informed by a wide range of considerations, including environmental constraints, engineering requirements, operational resilience, constructability, impacts on existing land uses and interactions with third-party assets. The rationale for the selected

Reference	Theme	Issue raised	The Applicant's response
			route and design evolution is set out within the Scheme Development Report [APP-073, APP-074, APP-075].
RR-233-4	Landowner engagement	In March 2026, Dalcour Maclaren, issued Heads of Terms for an Option Agreement to each affected Landowner. Having considered these terms in the context of each landowner and affected property, they were deemed unacceptable for a number of reasons but primarily because of the following: • inadequate easement payments due to undervaluing of affected land/property • Option period too long • inadequate costs undertaking • landowners rights removed to make subsequent representations/objections • inability to submit planning applications on affected property during option period • the granting of unacceptable associated surveying rights and enabling works Although these terms have been improved slightly recently, they still do not represent a viable set of terms that I am happy to recommend to my clients that they accept voluntarily at this time. Currently, as at the date of this representation, none of my 28 affected landowner clients have agreed to the latest version of the Heads of Terms of the proposed Option/Easement agreements.	As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with landowners regarding voluntary agreements and has continued discussions with landowners. To facilitate collective engagement on voluntary agreements, a number of professional representatives formed a Land Agent Group in February 2025. The Applicant issued draft Heads of Terms to the Land Agent Group on 3 February 2025 and subsequently engaged in negotiations on the terms. This engagement included in-person meetings with the Land Agent Group and several revisions to both the Heads of Terms and the commercial offering in response to feedback received. Following these discussions, the Applicant commenced issuing Heads of Terms to all landowners on 6 March 2026. Since acceptance of the DCO application for Examination, the Applicant has made further amendments to clauses within the proposed Heads of Terms and an improved commercial offer to landowners, further demonstrating reasonable efforts to engage constructively and reach a voluntary agreement. These amendments address a number of the points raised by the respondent. The Applicant notes the respondent's acknowledgment that amendments have been made during the course of negotiations. Whilst agreements have not yet been reached with the respondent's clients, the Applicant remains committed to continuing constructive discussions in order to make progress. It remains the Applicant's preference to secure the necessary land rights by voluntary agreement wherever possible. Whilst the Applicant would prefer to be able to advise the Examining Authority of a higher return of signed Heads of Terms, it does not consider this to be because the terms offered to landowners are unreasonable. To date, despite formally requesting evidence demonstrating why the commercial offer is considered unreasonable on 28 January 2026, the Applicant is yet to receive a response. The Heads of Terms proposed by the Applicant closely align with those adopted across other utilities and infrastructure projects, which have also been reviewed and accepted by respective land agent groups.
RR-233-5	Landowner engagement	Alongside, and in collaboration with a number of other local agents who are representing other landowners on the proposed route (who collectively make up a significant percentage of the overall route), we have been trying to negotiate with Dalcour Maclaren/Southern Water on behalf of all of our clients collectively to try and reach a compromise regarding easement payments and option terms but thus far we have been unsuccessful in reaching an agreement.	The Applicant refers to the above response to RR-233-4. The Applicant will continue to offer meetings with the respondent's clients to discuss the Heads of Terms in order to seek to reach voluntary agreements. The Applicant notes the respondent's comment on professional fees, however the Applicant directs the respondent to the government guidance "Awards of costs: examinations of applications for development consent orders" which confirms that all parties will normally be expected to meet their own costs.

Reference	Theme	Issue raised	The Applicant's response
		These registration comments are hereby being submitted by me personally as an agent currently acting for and representing 28 affected landowner clients on the proposed route. The decision to register as an agent was made following Southern Water's confirmation that they would not settle my professional fees for registering and submitting comments on behalf of all of my clients individually.	This was discussed directly with the respondent and the rest of the Land Agent Group at a meeting on the 14 July 2026.

Table 2-45 The Applicant's response to RR-238 from Paul Weir

Reference	Theme	Issue raised	The Applicant's response
RR-238-1	Interface with the Applicant's existing infrastructure and assets	It has come to our attention that there is not sufficient water processing capability at Otterbourne Southern Water works to process the extra water resulting from this pipeline to the required cleaning standards required for the 2030's.	Alongside the Project, the Applicant is developing upgrades to Otterbourne Water Supply Works (Otterbourne WSW) under its business-as-usual Capital Delivery programme to ensure that it can receive the additional water provided by the Project and continue to treat water to the required standard and quality. The upgrade works are planned to be commissioned and in operation in readiness for the Project.
RR-238-2	Interface with the Applicant's existing infrastructure and assets	Therefore additional separate plans are currently being prepared by Southern Water and CMDP+ to significantly expand the Otterbourne plant, which will bring further significant additional nuisance and disruption to Otterbourne residents.	Upgrades to Otterbourne Water Supply Works (Otterbourne WSW) are separate from the Project and would be subject to separate planning permission. The Applicant has considered how the impacts of the Project could combine with the impacts of upgrades to Otterbourne WSW in the cumulative and in-combination effects assessment, as set out in ES Chapter 20 Cumulative and in-combination effects [APP-099].
RR-238-3	Cumulative effects	Therefore this proposed project should include and consider ALL the resulting impacts on Otterbourne that Southern Water is currently planning via separate processes.	A requirement of the Environmental Impact Assessment (EIA) process is to undertake and present an assessment in the Environmental Statement (ES) of the "cumulative effects' from the interrelationship between the Project with other developments. This is presented in ES Chapter 20, Cumulative and in-combination effects [APP-099], ES Appendix 20.1 List of other developments – longlist and shortlist [APP-208] and ES Appendix 20.2 Cumulative effects assessment (CEA) [APP-209]. Section 1.5 of ES Appendix 20.2 [APP-209] presents the CEA of 'Other development, which is related or consequential, but which is proposed to be consented or delivered separately' which includes projects the Applicant is currently planning via separate processes. The relevant Applicant projects in the Otterbourne area are: • Upgrades to the Applicant's Otterbourne Water Supply Works (WSW) - no significant cumulative effects identified Erection of a new Motor Control Centre Kiosk and Compressor Kiosk in connection with the Southampton Link Main pipeline - no significant cumulative effects identified.

Table 2-46 The Applicant's response to RR-257 from Reece Percival

Reference	Theme	Issue raised	The Applicant's response
RR-257-1	Landowner engagement	I am registering because the proposed pipework may go through our property	The Applicant has identified the respondent as a potential Category 3 interest within the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1). The respondent can find details on the types of works to be undertaken in the vicinity of their property on Sheet 4 in the Works Plans [APP-013]. The works are located south of the railway tracks and comprise 'Work No.3 – Pipelines between the WRP site and Bedhampton Springs' and 'Work No.6 – Construction Compound'. A description of what these Works Numbers comprise can be found in 'Schedule 1 – Authorised Development' to the Draft Development Consent Order [APP-023].

Table 2-47 The Applicant's response to RR-258 from Registered Proprietors of Land at Roche Estate

Reference	Theme	Issue raised	The Applicant's response
RR-258-1	Landowner engagement	The proposed development will have unacceptable impacts on the operation of the Roche Court Estate that have not been fully considered by the Applicant. Further details can be found in our representations to follow today.	The Applicant notes this comment, however as detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken extensive engagement with landowners and considered all feedback provided throughout statutory and non-statutory consultation. The Scheme Development Report [APP-073, APP-074 and APP-075] sets out the process that was undertaken to select the pipeline routes, construction compounds and AGP sites. Impacts on the operation of the Roche Court Estate have been considered in Environmental Statement (ES) Chapter 12 Land Use and Agriculture [APP-091]. The assessment acknowledges that agricultural land required temporarily for pipeline construction would be taken out of agricultural production for a short period; however, following installation, land would be restored to its pre-existing agricultural use through the careful stripping, storage and reinstatement of soils in accordance with the Outline Soil Resource Management Plan (SRMP) secured through Appendix B of the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). Following construction, the pipeline would be located below ground and the land returned to agricultural use. Access during operation would be limited to infrequent maintenance or emergency activities where required.
RR-258-2	Landowner engagement	RELEVANT REPRESENTATIONS ON BEHALF OF	The Applicant notes this comment. The Applicant has since had further engagement with the respondent's land agent throughout September 2026 regarding their land interests and is now undertaking a review of their interests

Reference	Theme	Issue raised	The Applicant's response
		Mr Mark Thistlethwayte and Mr Rupert Thistlethwayte, the registered proprietors of the Roche Court Estate 1. Introduction 1.1 We act for Mr Mark Thistlethwayte and Mr Rupert Thistlethwayte, the registered proprietors of the Roche Court Estate (our "Client"). 1.2 Our Clients are the freehold owners of the Roche Court Estate, Fareham, Hampshire and registered at HM Land Registry under title number HP670236 (the "Roche Court Estate"). The registered Title Plan is attached at Annexure 1 showing the land within the title edged in red, excluding the land edged in green. An indicative plan showing the land remaining within this title is attached at Annexure 2. There are other beneficial and partnership interests affecting the Roche Court Estate - it is not thought the Examining Authority needs to be made aware of the detail but this can be disclosed if required. 1.3 Approximately 28 Land Plots, as set out in the Book of Reference (APP-027), acquire rights over or interests in the Roche Court Estate. For those plots, our Client is therefore a category 1 person as set out in s. 57 Planning Act 2008. The precise plots are set out in the Schedule at Annexure 3 to this Relevant Representation (the "Schedule"). Please note that the land plots identified are based on a review of the various Land Plans against the registered title plan to the Roche Court Estate. As such, it is possible that there may be discrepancies as we have not carried out any Land Registry SIM searches to verify the position. It is therefore possible that additional land plots may be identified as part of our more detailed review of the Application. 1.4 The Roche Court Estate adjoins and is connected with, but is in separate ownership to, additional land also affected by the DCO. In particular, the parcels owned by Welborne Land Limited and the Southwick Estate. Our Client anticipates they will be impacted by works carried out on land adjoining or near to the Roche Court Estate. For example, the precise routes of services or other easements serving the Roche Court Estate will not always be documented on the registered titles (or known to our Client) and the Roche Court Estate is likely to be impacted in the long term by the proposed use of land Plot 11-022 (which is in separate legal ownership). Further details will be provided in due course. 1.5 Our Client will also be classified as Category 2, Category 3 and Part 3 persons in respect of land plot numbers neighbouring the Roche Court Estate. 1.6 These representations focus on identifying where our client is a Category 1 Person. 1.7 Our Client objects to the application, for the reasons set out below.	within the Order Limits. The Applicant is in the process of checking and verifying the information with the respondent and will update the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1) accordingly with any necessary amendments.
RR-258-3	Landowner engagement	2. Book of Reference inaccuracies 2.1 The plots of land that Our Client has an interest in is shown on Land Plans numbers 10 to 13 (inclusive) of 30 as set out in APP-010.	The Applicant has undertaken diligent inquiry to obtain the details of persons with an interest in the Order Limits, as summarised in the Consultation Report [APP-029] Section 9.3.17 to 9.3.30. As part of this process Land Interest Questionnaires (LIQs) were issued to the respondent ahead of the Summer 2024 Consultation to assist the respondent in identifying themselves,

Reference	Theme	Issue raised	The Applicant's response
		2.2 We have reviewed the Book of Reference and the Land Plans, solely for the purpose of determining the land plots that the Applicant believes Our Client has an interest in as listed here. This review has not involved a technical overlay of plans nor full title referencing. 2.3 Nevertheless, we understand that the information in the Book of Reference relating to Our Client's interests is not fully accurate and we are therefore undertaking our own land referencing exercise to confirm this information. We understand various lessees and tenants have not been properly identified. Our Client's full position will be set out in correspondence with the Applicant in the first instance (bearing in mind the guidance on drafting relevant representations indicates names should not be used) and can be provided to the Examining Authority if required. 2.4 For current purposes, the 'Owner' referred to in the Book of Reference for all the land plots identified in the Schedule should be: 2.4.1 Mark Thistlethwayte, Southwick Estate, The Estate Office, West Street, Southwick, Fareham, Hampshire, PO17 6EA; and 2.4.2 Rupert Thistlethwayte, Southwick Estate, The Estate Office, West Street, Southwick, Fareham, Hampshire, PO17 6EA Rather than the details for the Owner currently referred to in the Book of Reference.	confirming contact details and clarifying land ownership, occupation, tenancy arrangements and any other interests in land, including rights of way and option agreements. The LIQs also sought to confirm that land ownership and occupation boundaries were correctly identified. The Applicant did not receive a response to these LIQs from the respondent despite reminder letters being sent. The Applicant then issued the respondent a Confirmation Schedule in October 2025, which summarised the Applicant's understanding of the respondent's interest in land relevant to the Project. The Applicant sought a response to confirm whether the information held was correct, however the no response was provided despite a further reminder letter being issued in December 2025. The Applicant has since had further engagement with the respondent's land agent throughout September 2026 regarding their land interests and is now undertaking a review of their interests within the Order Limits. The Applicant is in the process of checking and verifying the information with the respondent and will update the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1) accordingly with any necessary amendments.
RR-258-4	Landowner engagement	3. Negotiations to avoid compulsory acquisition before the application for compulsory purchase powers 3.1 Our Client is keen to reach a private agreement with the Applicant relating to the impacts of the Application. However, there has been very little meaningful engagement to date from the Applicant. Our client acknowledges that meetings have taken place with the Applicant, they have been presented with heads of terms for the acquisition of the necessary rights for the DCO, however there is no genuine desire by the Applicant to negotiate as all of our Clients suggested amendments to the heads of terms were rejected but without good reason.	The Applicant is committed to working collaboratively with landowners and it remains the Applicant's firm preference to reach a voluntary agreement for the acquisition of land and rights where possible. As detailed within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken extensive attempts to meaningfully engage with landowners on voluntary agreements and has continued to have productive discussions with them either directly or through their professional representatives. In February 2025 a number of the professional representatives, including the respondent's land agent, formed a Land Agent Group to collectively consider and progress discussions on Heads of Terms for voluntary agreements to ensure that all land agents representing landowners impacted by the project were represented equally, regardless of land holding or perceived impact. The Applicant issued Heads of Terms to the Land Agent Group on 3 February 2025 to provide them an opportunity to review the proposals and gather comments ahead of the first meeting between the Land Agent Group and the Applicant. The Land Agent Group provided their initial comments on the Heads of Terms on 24 February 2025. Following this, the Applicant undertook a multidisciplinary review of the comments made. In addition to this, several points were also referred to external consultants to ensure a comprehensive review was completed and that the terms were aligned with what was being sought in the DCO

Reference	Theme	Issue raised	The Applicant's response
			application. The Applicant responded to the Land Agent Group on 5 August 2025 with further updates to the Heads of Terms. The first Agent Group meeting was held on 10 September 2025 where the Applicant and the Land Agent Group reviewed and discussed comments on the Heads of Terms. There was a second meeting on 23 January 2026 to discuss further feedback from the Land Agent Group, after which the Applicant issued the final template for the Heads of Terms on 26 February 2026. Following this, the Applicant commenced issuing Heads of Terms to landowners on 6 March 2026. The Applicant then reviewed further feedback received in June 2026 from the Land Agent Group on both the terms and commercial offer. A third Land Agent Group meeting was held to discuss these points further on the 14 July 2026. Based on this feedback the Applicant wrote to all landowners on the 7 August 2026 with an improved commercial offer and amended terms to address further points from the Land Agent Group. The Applicant met with the respondent on 10 November 2026 where progress was made on the Heads of Terms. The Applicant considers that this sustained programme of engagement and negotiation demonstrates that significant efforts have been made to secure voluntary agreements prior to, and alongside, the compulsory acquisition process. The Applicant remains willing to discuss voluntary agreements and is continuing to engage with the respondent's land agent regarding their feedback and comments on the Heads of Terms.
RR- 258-5	Land use and agriculture	4. Impacts on the Roche Court Estate 4.1 The Schedule sets out, in detail and plot by plot, the negative impacts of the Application on the Roche Court Estate if granted. In broad terms, those are: 4.1.1 Much of the affected land within the Roche Court Estate is used for agriculture by agricultural tenants, whose farm business will be disrupted during construction and potentially during operation if there are any emergencies that require access to the pipe. There could be, for example, deterioration of the soil quality; and crop losses and reduced yields.	The Applicant recognises concerns regarding potential disruption to agricultural operations within the Roche Court Estate during construction and operation. These matters have been assessed in Environmental Statement (ES) Chapter 12 Land Use and Agriculture [APP-091]. The assessment acknowledges that agricultural land required temporarily for pipeline construction would be taken out of agricultural production for a short period; however, following installation, land would be restored to its pre-existing agricultural use through the careful stripping, storage and reinstatement of soils in accordance with the Outline Soil Resource Management Plan (SRMP) secured through Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). Following construction, the pipeline would be located below ground and the land returned to agricultural use. Access during operation would be limited to infrequent maintenance or emergency activities where required. ES Chapter 12 Land Use and Agriculture [APP-091] also considers potential impacts on agricultural land use, including disruption to access, livestock movements, field severance, water supplies and drainage. Commitments secured through the Outline CEMP (Document reference 7.1, DCO Volume 7,

Reference	Theme	Issue raised	The Applicant's response
			Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) include maintaining access where reasonably practicable, providing temporary crossing points across the working width where necessary, relocating livestock water supplies where required, and ongoing engagement with landowners and occupiers. The assessment concludes that impacts on agricultural land use would be short-term and temporary, with a minor adverse effect that is not significant.
RR-258-6	Location of AGP	Pumping Station F will be located in a Roche Court Estate field, severing it, leading to a loss of approximately 3 ha of agricultural production, and having a detrimental impact on nearby fields that can still be farmed (e.g. through soil compaction).	ES Chapter 12 Land use and agriculture [APP-091] provides an assessment on the temporary and permanent loss of agriculture land from the construction and operation of the Project and the impact on soil function. The Outline Soil Resource Management Plan (SRMP) (Appendix B to the Outline Construction Environmental Management Plan) [APP-412, 1 of 3 documents] provides for the following measures: • The Contractor will be required to undertake pre and post-construction soil surveys • The Agricultural Liaison Officer (ALO) will be required to prepare the record of condition to capture the conditions of land prior to entry being taken to commence the construction works The ALO will be required to coordinate the drainage surveys and the sharing of pre- and post-construction construction drainage schemes with landowners, occupiers and agents in advance of construction.
RR-258-7	Location of AGP	4.1.2 The proposed scheme is adjacent to the Welborne Garden Village Development site (in connected ownership). The Roche Court Estate is to be used to satisfy requirements arising from that development: this includes electricity infrastructure, biodiversity net gain and other environmental requirements, and providing the main substation needed for the Welborne Garden Village alongside BNG requirements from that, discrete, substation development. The Applicant however has frustrated all of these plans by earmarking the Roche Court Estate for its Pump Station F and to satisfy the Applicants environmental mitigation and environmental enhancements in connection with the DCO, though to date our Client has not been provided with any details of precisely what those mitigation and enhancement measures are.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. The Applicant is engaging with the developers of Welborne Garden Village to discuss the potential interfaces between the two projects. The Applicant is aware of the proposed infrastructure and utilities beyond the Welborne Garden Village boundary, and has designed the Project considering these. The Scheme Development Report [APP-075] sets out the process that was undertaken to select the AGP sites. The environmental mitigation proposals for IPS-F are set out in Table 3-4 of the Design Principles Document [APP-076].
RR-258-8	Landscape and visual	4.1.3 The DCO will also have adverse landscape or visual impacts for the Welborne Garden Village (as raised in those representations) and on the many footpaths that run through the Roche Court Estate and the adjoining ownerships, the footpaths are shown on the attached plan (Annexure 4) with a dashed green line and the bridleways are shown dashed orange.	The proposed Intermediate Pumping Station F (IPS-F) has been positioned to minimise landscape and visual effects. The site is located on lower ground within a narrow valley, adjacent to consented development associated with Welborne Garden Village. It has been designed to take advantage of existing landform, vegetation and proposed mitigation planting to assist with landscape integration and visual screening. The design incorporates a range of embedded mitigation measures, including limiting maximum building heights, woodland and scrub planting within the north-west and north-east areas of the site and enhancement of existing surrounding hedgerows to strengthen

Reference	Theme	Issue raised	The Applicant's response
			landscape pattern and green infrastructure connectivity; and the creation of a new broadleaved woodland belt along the south-eastern boundary to provide visual screening for Public Rights of Way (PRoW) users and improve habitat connectivity. The architecture of the proposed buildings including finishes and fencing will be designed to minimise visual effects and reflect local rural character through appropriate materials and colours. These measures are illustrated within the Indicative Environmental Masterplan appended to the Design Approach Document [APP-077 to APP-079 – 3 documents] and are secured through the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). The likely landscape and visual effects of the Project are assessed in Environmental Statement (ES) Chapter 13 Landscape and Visual [APP-092]. The assessment considers future residents on the northern edge of Phase 5 of the approved Welborne Garden Village development within the future baseline and year 15 operation scenarios. This assessment is informed by nearby representative viewpoints, including Viewpoint (VP) 047 and VP123, and concludes that IPS-F would be partially screened by the proposed landscape buffer and mitigation planting. The assessment concludes that residual visual effects on future residents of the northern edge of Phase 5 of Welborne Garden Village would be minor adverse and not significant. The assessment also includes several representative viewpoints on the surrounding PRoW network, including VP045, VP124, VP130 and VP131, which are representative of views experienced by users of footpaths and bridleways within and around the Roche Court Estate. The location of these representative viewpoints was agreed with the relevant local planning authorities. Viewpoint locations are shown on ES Figure 13.22 Representative Viewpoints [APP-327], viewpoint photography is presented within ES Figure 13.23 Viewpoint Photography [APP-328 to APP-372- 45 documents], including photomontages for VP124 and VP130, and the detailed assessment is provided in ES Appendix 13.4 Visual Baseline and Effects [APP-174]. The assessment concludes that, following implementation of the proposed mitigation measures and the establishment of mitigation planting, residual landscape and visual effects during operation would not be significant for users of the surrounding PRoW network.
RR-258-9	Landowner engagement	Moreover, the scheme could well constrain or delay the provision of utilities required over the Roche Court Land in order to serve the Wellborne Garden Village	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. The Applicant is engaging with the developers of Welborne Garden Village to discuss potential interfaces with utilities and infrastructure. Further information was recently sent to the developer's project manager on the 18 September 2026 to progress discussions regarding the infrastructure and utilities network being constructed.

Reference	Theme	Issue raised	The Applicant's response
RR-258-10	Water environment	4.1.4 The Schedule raises a number of concerns about the environmental impact of the proposed project, particularly due to its close proximity to the River Wallington.	The Applicant acknowledges the Respondent's comments regarding the pipeline's proximity to the River Wallington. The River Wallington crossing would be undertaken using a trenchless construction technique, avoiding direct disturbance to the watercourse. Measure WE14 of the Outline CEMP – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1) commits the Contractor to develop a Drilling Fluid Management Plan prior to the commencement of trenchless construction, for agreement with the Environment Agency. This plan will document how risks of breakouts will be managed. Potential construction-related risks arising from open-cut works on the floodplain of the River Wallington and its tributaries will be managed through measures set out in the Outline CEMP – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1), including measures for pollution prevention, sediment control and containment of accidental releases: • WE4: A Construction Drainage Plan will be prepared by the Contractor to manage the quality and quantity of construction stage drainage. • WE5: The Construction Drainage Plan will incorporate measures to reduce the risk of sediment entrainment and supply to surface waters. • WE6: Measures to manage the risk of accidental spillages or leakage of contaminants into surface and groundwaters. On the basis of these measures, the assessment presented in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) concludes that there will be no significant adverse effects on the River Wallington.
RR-258-11	Construction impacts and effects	4.1.5 During construction, the proposed works will interfere with access to the residential and commercial tenants at Whitedell Farm comprised of residential and commercial properties.	The Applicant notes this concern and is committed to working collaboratively with landowners and occupiers to minimise disruption during construction and agree practical access arrangements wherever reasonably practicable. Potential effects on access to residential properties and businesses during construction have been assessed within Chapter 12 Land use and agriculture [APP-091]. The assessment recognises that construction activities may result in temporary disruption to access; however, access to residential properties and commercial premises would be maintained throughout the construction period including to Whitedell Farm. Chapter 18 Traffic and Transport [APP-097] states that in order to construct the temporary accesses as well as the Pipeline between the WRP site and Otterbourne WSW, road closures would be required on Whitedell Lane. The chapter concludes that the short-term temporary effects would be of minor adverse significance (not significant) with regards to driver delay. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) includes measures to manage construction activities and maintain communication with affected landowners, occupiers and businesses. A

Reference	Theme	Issue raised	The Applicant's response
			Framework Construction Traffic Management Plan (CTMP) [APP-415] has also been prepared and submitted as part of the DCO application and provides detail on construction traffic management measures that will be implemented during construction to reduce construction traffic impacts and the potential for disruption to access. Through ongoing engagement, the Applicant will seek to ensure that any temporary restrictions on access are managed appropriately and that reasonable access arrangements are maintained for residential and commercial tenants at Whitedell Farm throughout the construction period.
RR-258-12	Landowner engagement	4.1.6 The Applicant proposes to use our Clients' primary agricultural access track (which is not classified as a public highway or a PROW so does not benefit from the Applicants promise to make good any damage to highways and PROW in the Framework CTMP see APP-415) for construction traffic which are simply not designed for it. That could cause harm to Our Clients' land.	The Applicant confirms that the Framework Construction Traffic Management Plan (CTMP) [APP-415] details the highway condition surveys to be undertaken before and after the construction period on minor roads including those within the Roche Court Estate. A list of the roads that will be subject to highway condition surveys, including Whitedell Lane, can be found in section 6.5 of the Framework CTMP [APP-415]. Any damage to the highway network arising from their use by construction vehicles identified during these surveys within the agreed scope would be rectified at the Applicant's expense. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) includes mitigation measures to ensure agricultural access is maintained to farm tracks. The Applicant has also made a specific commitment relating to maintaining access for landowners where reasonably practicable An Agricultural Liaison Officer (ALO) will be appointed for the Project and will be the primary point of contact for landowners on agricultural matters. The ALO will remain appointed for up to one year post-construction. Any defects identified in reinstatement in this time may be raised with the ALO.
RR-258-13	The draft DCO	4.2 Our Client remains willing to engage with the Applicants to consider and provide alternatives, both relating to alternative sites for the proposed infrastructure and/or alternative wording for the rights sought under, or requirements of, the draft DCO.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. As explained in the Statement of Reasons [APP-025], ES Chapter 4: Consideration of alternatives [APP-083] and the Scheme Development Report [APP-073, APP-074 and APP-075], the Applicant has also considered alternatives to the Project and to compulsory acquisition, refined the extent of the Order Land through the design process and sought to minimise interference with private interests by acquiring rights rather than freehold interests wherever practicable. The Applicant considers that the land and rights sought are no more than reasonably necessary for the construction, operation, maintenance, monitoring, repair and protection of the authorised development.
RR-258-14	Landowner engagement	Annexure 1 Title Plan for HP670236 Annexure 2	The Applicant notes this comment. Please refer to the Applicant's response to RR-258-3 regarding the Applicant's engagement with the respondent on their land interests.

Reference	Theme	Issue raised	The Applicant's response
		Overview Plan for Roche Court Estate Annexure 3 Schedule Annexure 4 PROW plan [MAP] [MAP] Hampshire Water Transfer and Water Recycling Project DCO Property: Land at Roche Court (title number HP670236 - freehold) "Roche Court Estate" Registered Proprietors: Mark Thistlethwayte and Rupert Thistlethwayte as registered proprietors of the Roche Court Estate both of Southwick Estate, The Estate Office, West Street, Southwick, Fareham, Hampshire, PO17 6EA Interested Person Registration Number: F4D5746DB When considering the plans please note the following key: [IMAGE] Relevant plot numbers shown as blue highlight in Schedule below Relevant plot numbers shown as pink highlight Relevant plot numbers shown as yellow highlight Please note the land ownership in respect of the Land Plots below have been identified 'by eye' on review of the various plans and no HMLR SIM searches have been carried out to confirm the position. Therefore, there may be small areas where the boundaries between adjoining landowners are not entirely clear from the Land Plans (particularly for the smallest of Plots). As such there may be minor discrepancies (and HMLR SIM searches required to confirm the position).	
RR-258-15	Landowner engagement	1 Drawing reference (Examination Library number APP-010) 23008233_PLN_LAND_10 Land Plan number Sheet 10 of 30 Land plots 10-010 Impacts of DCO: now Land is part subject to an Agricultural Holdings Act tenancy (AHA) and part let under a Farm Business Tenancy (FBT) the proposed DCO may create	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan which forms Appendix B of the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming operations.

Reference	Theme	Issue raised	The Applicant's response
		uncertainty for the tenants and could adversely affect ongoing agricultural management and investment decisions.	Those affected by compulsory acquisition or temporary possession under the Development Consent Order may be entitled to compensation in line with the Compensation Code and relevant statutory provisions.
RR-258-16	Land use and agriculture	Land plots 10-010 Impacts of DCO: during construction Construction activities are likely to cause disturbance to the agricultural tenant, resulting in crop loss, loss of crop establishment costs, reduced yields, and additional costs associated with reinstatement and re-establishment of farming operations. There will be noise and dust which will cause disturbance to the tenant and additional costs associated with reinstatement and re-establishment of farming operations.	The Applicant acknowledges that construction activities may result in temporary disturbance to agricultural operations. These matters have been assessed in Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091], which considers the temporary loss of agricultural land during construction, impacts on agricultural land use, disruption to farming activities, and the reinstatement of land following completion of the works. The assessment in ES Chapter 12 Land use and agriculture [APP-091], acknowledges that agricultural land required temporarily for construction may be taken out of agricultural production for a limited period and that temporary crop losses may occur during construction. Following installation of the pipeline, land would be reinstated and returned to agricultural use in accordance with the Outline Soil Resource Management Plan (SRMP), contained within Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). Measures secured through the Outline CEMP include maintaining access where reasonably practicable, providing temporary crossing points where necessary, relocating livestock water supplies where required, and ongoing engagement with affected landowners and occupiers. The assessment in ES Chapter 12 Land use and agriculture [APP-091], concludes that impacts on agricultural land use would be temporary and short-term, resulting in a minor adverse effect that is not significant. Disturbed agricultural land would be reinstated following construction in accordance with the Outline Soil Resource Management Plan appended to the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). Construction activities would be undertaken in accordance with the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3), which includes measures to control noise and vibration, including the development of a Noise and Vibration Management Plan by the Lead Contractor, and dust, including the development of a Dust Management Plan, during the construction period.
RR-258-17	Land use and agriculture	Land plots 10-010 Impacts of DCO: during operation The DCO may continue to affect the tenant's productivity and ability to farm the land effectively. If the land is returned to the Estate, operational restrictions may also limit the Estate's future use of the land and negatively. affect the viability and success of agricultural or alternative land uses. Soil quality is likely to be reduced, with potential longterm issues relating to soil structure and drainage, further affecting the land's productivity and value.	The Applicant notes the concern that the installation and operation of the pipeline could adversely affect the ongoing productivity, management and future use of agricultural land. Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091] states that there would not be a restriction on normal agricultural operations above the pipeline following installation and that normal agricultural operations can resume on the surface following reinstatement. Accordingly, no significant operational restrictions on agricultural land use, farm management activities or future agricultural use of the land are anticipated once construction has been completed and the land reinstated. The pipeline will be installed to a minimum

Reference	Theme	Issue raised	The Applicant's response
		The Estate may be unable to undertake planned rent reviews, and there is a risk that existing agricultural tenancies could be terminated if the affected land is no longer considered agriculturally productive. This could result in a reduction or loss of rental income to the Estate.	depth of 0.9m from the crown of the pipe and the original soil reinstated over the top. The construction of the Project will result in a temporary short-term disturbance to the agricultural land, which will be reinstated to its original condition, enabling agricultural operations to resume. The provisions of the Outline Soil Resources Management Plan (SRMP), as contained in Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), are designed to protect soil resources, maintain soil structure and drainage characteristics, and enable affected land to be reinstated to its previous agricultural use following construction. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions.
RR-258-18	Land use and agriculture	2 Drawing reference (Examination Library number APP-010) 23008223_PLN_LAND_11 Land Plan number Sheet 11 of 30 Land plots 10-010 (also on Sheet 10 of 30) Impacts of DCO: now As above Impacts of DCO: during construction As above Impacts of DCO: during operation As above Drawing reference (Examination Library number APP-010) Land Plan number Land plots 11-001 Impacts of DCO: now As above Impacts of DCO: during construction As above Impacts of DCO: during operation	Please refer to the Applicant's response to references RR-258-15 to RR-258-17.

Reference	Theme	Issue raised	The Applicant's response
		As above Drawing reference (Examination Library number APP-010) Land Plan Land plots 11-002 Impacts of DCO: now As above Impacts of DCO: during construction As above Impacts of DCO: during operation As above	
RR-258-19	Land use and agriculture	Drawing reference (Examination Library number APP-010) Land Plan Land plots11-003 Impacts of DCO: now Temporary road closures associated with surveys could adversely affect tenants, restrict access, disrupt agricultural practices, and interfere with planned shooting and other estate activities. There is currently little disturbance.	The Applicant notes this comment and is committed to working collaboratively with landowners. The Applicant has endeavoured and will continue to mitigate the impact of its survey programmes on landowners, including any requirements for temporary private road closures. The Applicant undertook a comprehensive set of surveys in 2023, 2024 and 2025 to inform the Environmental Impact Assessment. This was necessary to ensure that land potentially affected by the Project was appropriately understood and assessed as part of the Environmental Impact Assessment. Where possible, access for surveys was agreed with landowners via voluntary access licences. An upfront payment was made ahead of survey access being taken to reflect any potential losses suffered as a result of the survey works, but landowners were able to make a claim if losses exceeded that initial payment. The Applicant will continue to engage with affected parties to seek to agree access where required by voluntary agreement where possible and aims to minimise disturbance to existing land uses as far as reasonably practicable. The Applicant recognises that survey activities may also have caused temporary disruption to other estate activities, including recreational and sporting activities undertaken on the Estate, and has sought to minimise such disruption through ongoing engagement and the agreement of access arrangements wherever reasonably practicable.
RR-258-20	Land use and agriculture	Land plots11-003 Impacts of DCO: during construction Road closures will affect residential and commercial occupiers at Whitedell Farm and will also cause disruption to the shoot. Road closures may necessitate changes to the tenant's farming operations, including alterations to crop rotations and delays to planned tree and hedge planting, where access to land is restricted because of the closures.	The Applicant recognises that temporary road closures may affect access to agricultural land, residential properties and other estate activities due to construction. Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091] considers the temporary or permanent impacts on agricultural land use, for example as a result of disruption to movements of livestock, loss of access or boundary features, disruption to land management agreements or severance of agricultural fields. Given the short term and temporary nature of the pipeline installation, it is not anticipated that there would be any likely significant effects arising from ongoing farm viability issues

Reference	Theme	Issue raised	The Applicant's response
			that cannot be resolved through measures implemented in accordance with the relevant environmental legislation and best practice guidance contained within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), including ongoing discussion and negotiation. Commitments are also contained within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) in respect of the maintenance of access to farm tracks and the provision of private farm access across the open-cut pipeline during construction as required and where feasible to mitigate field severance. ES Chapter 12 Land use and agriculture [APP-091] also considers the temporary effects of construction on residential property access and boundary features. The Applicant recognises that construction activities and temporary road closures may affect access to residential receptors. Measures secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) include maintaining access for landowners and occupiers where reasonably practicable, providing gates, stiles or alternative access arrangements where required, and ongoing engagement with affected residents regarding construction phasing and access requirements. The Stakeholder and Customer Communications Plan will provide advance notice of temporary access restrictions and road closures to minimise disruption during construction. Accordingly, whilst temporary disruption may occur during construction, access to residential properties, agricultural land and estate operations would be maintained where reasonably practicable through the implementation of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3)] and ongoing engagement with affected occupiers.
RR-258-21	Land use and agriculture	Land plots11-003 Impacts of DCO: during operation This could also cause issues to the shoot especially if there is any emergency or maintenance works which need to be carried out.	The Applicant acknowledges the concern that emergency repair or maintenance works undertaken during the operational phase could temporarily affect access along this section of highway. However, as set out in Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091], operation of the Project would not result in the permanent loss of access or land use. Protective strips are required to ensure access for maintenance and repair and to protect the integrity of the pipeline, but the land would remain available for its existing use. Any maintenance or repair works would be localised, temporary and undertaken only as required. ES Chapter 12 Land use and agriculture [APP-091] concludes that any impacts arising from maintenance activity would be short-term and temporary and would be unlikely to result in likely significant effects. Appropriate measures for maintenance activities, including reinstatement following any repair works, would be secured through the Operational Environmental Management Plan [APP-422]. Accordingly, whilst temporary disruption may occur in the event of maintenance or emergency repair works, no likely significant operational effects on land use or access are anticipated

Reference	Theme	Issue raised	The Applicant's response
RR-258-22	Land and agriculture use	Drawing reference (Examination Library number APP-010) Land Plan Land plots 11-004 Impacts of DCO: now Land is subject to an FBT and the proposed DCO may create uncertainty for the tenant and could adversely affect ongoing agriculturalmanagement and investment decisions. The Estate may be unable to undertake planned rent reviews, and there is a risk that existing agricultural tenancies could be terminated if the affected land is no longer considered agriculturally productive. This could result in a reduction or loss of rental income to the Estate.	The Applicant acknowledges concerns regarding the potential effects of the Project on agricultural tenancies and estate income. Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091] considered the potential for temporary and permanent impacts on agricultural land use, including disruption to agricultural operations, access, field severance and the viability of individual farm holdings. The assessment was informed by engagement with landowners and occupiers to understand the nature and operation of affected holdings. The assessment concludes that, given the short-term and temporary nature of pipeline installation and the measures secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3), including maintenance of access, provision of private farm crossings where practicable, and ongoing engagement and negotiation with affected landowners and occupiers, significant effects on the ongoing viability or operational capacity of farm holdings are not anticipated. ES Chapter 12 Land use and agriculture [APP-091] further concludes that impacts on agricultural land use would result in a short-term, temporary minor adverse effect that is not significant. Following construction, land would be reinstated to its pre-existing agricultural use in accordance with the Outline Soil Resource Management Plan (SRMP), as contained in Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) which contains good practice measures to minimise the risk of damage to soils when being handled, stored and reinstated, and to maintain soil structures and quality as far as possible. Where construction activities affect agricultural business operations, land use activities or associated functions, engagement with affected parties would continue throughout the construction period and compensation would be payable in accordance with the relevant provisions of the DCO and the statutory compensation code.
RR-258-23	Land use and agriculture	Land plots 11-004 Impacts of DCO: during construction Construction activities are likely to cause disturbance to the agricultural tenant, resulting in crop loss, loss of crop establishment costs, reduced yields, and additional costs associated with reinstatement and re-establishment of farming operations. There will noise and dust which will cause disturbance to the tenant and additional costs associated with reinstatement and re-establishment of farming operations. There will noise and dust which will cause disturbance to the tenant.	Please refer to the Applicant's responses to RR-258-16.
RR-258-24	Land and agriculture use	Land plots 11-004 Impacts of DCO: during construction	The Applicant notes the concern that the installation of a pipeline will adversely affect the practical use and productivity of the land during the construction of the Project.

Reference	Theme	Issue raised	The Applicant's response
		The DCO may continue to affect the tenant's productivity and ability to farm the land effectively. If the land is returned to the Estate, operational restrictions may also limit the Estate's future use of the land and negatively. affect the viability and success of agricultural or alternative land uses. Soil quality is likely to be reduced, with potential long-term issues relating to soil structure and drainage, further affecting the land's productivity and value.	Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091] assesses the temporary loss of agricultural land during construction, impacts on agricultural land use, disruption to farming activities and the reinstatement of land following completion of the works. The assessment acknowledges that agricultural land required temporarily for pipeline construction would be taken out of agricultural production for a limited period before being reinstated and returned to agricultural use. Mitigation measures contained in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) [APP-413] include maintenance of field accesses for landowners/occupiers in order to mitigate any field severance during construction works, and temporarily relocating water troughs, standpipes or field supplies if grazing land is severed, to enable continued use of land either side of the construction width. The provisions of the Outline Soil Resources Management Plan (SRMP), as contained in Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), ensure that damage to soil is avoided or minimised, and that soil structures are maintained, such that the land can be reinstated to its original use as soon as practicable following the installation of the pipeline.
RR-258-25	Land use and agriculture	Drawing reference (Examination Library number APP-010) Land Plan Land plots 11-005 Impacts of DCO: now Land is subject to an FBT and the proposed DCO may create uncertainty for the tenant and could adversely affect ongoing agricultural management and investment decisions.	The Applicant acknowledges concerns regarding potential uncertainty for the tenant of land subject to a Farm Business Tenancy (FBT). ES Chapter 12 Land use and agriculture [APP-091] assessed the potential effects of the Project on agricultural land use, including impacts on agricultural operations, access arrangements, field severance, and the viability or operational capacity of individual farm holdings. Chapter 12 Land use and agriculture [APP-091] concludes that, given the short-term and temporary nature of pipeline installation, significant effects on the ongoing viability of farm holdings are not anticipated. Commitments secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) [APP-413] and [APP-414] for documents 2 and 3) include maintaining access to farm tracks, providing private farm access across the working corridor where feasible, and ongoing engagement and negotiation with affected landowners and occupiers. The assessment states that it is not anticipated there would be any likely significant effects arising from ongoing farm viability issues that cannot be resolved through measures secured within the Outline CEMP, including ongoing discussion and negotiation. The significance of effect on farm holdings is assessed as short-term, temporary and minor adverse, and therefore not significant. Following construction, land would be reinstated to its pre-existing agricultural use in accordance with the Outline Soil Resource Management Plan (SRMP), as contained in Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), and normal agricultural

Reference	Theme	Issue raised	The Applicant's response
			operations would be able to resume. The Project would not permanently remove land above the pipeline from agricultural use.
RR-258-26	Land use and agriculture	Land plots 11-005 Impacts of DCO: during construction Construction activities and use of the land as a compound are likely to cause disturbance to the agricultural tenant, resulting in crop loss, loss of crop establishment costs, reduced yields, and additional costs associated with the reinstatement and re-establishment of farming operations. Noise, dust and general construction disturbance will adversely affect the tenant's use and management of the holding and may give rise to further operational impacts and associated costs.	Please refer to the Applicant's response to RR-258-16.
RR-258-27	Water environment	Land plots 11-005 Impacts of DCO: during construction The pipeline's proximity to the River Wallington, there is a risk of environmental impacts, including ecological disturbance, sedimentation, pollutant runoff entering the watercourse, and deterioration in water quality if construction activities are not appropriately managed and mitigated.	Please refer to the Applicant's response to RR-258-10, which explains how potential effects associated with construction across the River Wallington and its floodplain will be managed and mitigated.
RR-258-28	Land use and agriculture	Land plots 11-005 Impacts of DCO: during construction Use of the land as a construction compound may result in a deterioration of soil quality, including potential contamination, increased compaction, and the risk of permanent damage to soil structure. The compound site is also in close proximity to the water meadows and there is a risk that there may be flooding issues. The compound site covers a cover crop and so will greatly disturb the shoot.	The Applicant notes the concern that the presence of a temporary construction compound could adversely affect soil resources, drainage and existing land uses. Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091] assesses the likely significant effects of temporary construction compounds on agricultural land and soils. The provisions of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) [APP-413] and [APP-414] for documents 2 and 3) and the Outline Soil Resource Management Plan (SRMP) contained within Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) are designed to protect soil resources, maintain soil structure and drainage characteristics, and ensure that soils are handled, stored and reinstated appropriately following construction. Measures include only handling or trafficking soils when they are in a suitably dry state, ensuring stockpiles are protected from construction activity and erosion, and ensuring adequate land drainage. The assessment concludes that, with these measures in place, temporary disruption to soils would result in a neutral effect that is not significant. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) also includes measures to manage surface water, construction drainage and sediment control during the construction period to prevent site run-off into ditches, watercourses, drains, sewers or soakaways, and to manage flood risk with a Construction Drainage Plan. The Applicant also recognises that temporary construction activities and the presence of a construction compound may affect existing estate activities,

Reference	Theme	Issue raised	The Applicant's response
			including recreational and sporting activities undertaken on the Estate. The Applicant will continue to engage with affected parties regarding the timing and management of construction activities, with the aim of minimising disruption as far as reasonably practicable.
RR-258-29	Water environment	Land plots 11-005 Impacts of DCO: during operation There is also potential for adverse effects on existing land drainage systems, which could impact the future agricultural productivity of the holding.	The Applicant acknowledges the Respondent's comments regarding concerns about land drainage and agricultural productivity. Measure WE4 in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1), as secured by Requirement 6 of the draft Development Consent Order [APP-023] sets out a commitment for the Contractor to prepare a Construction Drainage Plan to manage the quantity and quality of construction stage drainage. The plan will be informed by surveys undertaken by a specialist drainage contractor, to locate drains and create pre-construction drawings to ensure appropriate reinstatement. Where appropriate, the Construction Drainage Plan will also include a suitable methodology for the reinstatement of land drainage systems impacted by pipeline installation, informed by the pre-construction drainage surveys. In the event that reinstating existing land drains is not feasible, Measure WE4 in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1) includes a commitment to implement a Post Construction Drainage Plan. This plan will specify the necessary course of action to restore soil structure and drainage status to at least the same condition as recorded prior to commencement of the construction works. Once implemented, the commitments set out in Measure WE4 in the Outline CEMP [APP-023] will ensure that future agricultural productivity is unaffected by the construction and operation of the Pipeline.
RR-258-30	Land use and agriculture	Land plots 11-005 Impacts of DCO: during operation The temporary and permanent effects of the works may adversely affect the agricultural viability of the land. This could restrict the Estate's ability to undertake planned rent reviews and may result in the termination of existing agricultural tenancies where the affected land is no longer considered productive for agricultural purposes. Consequently, the Estate may suffer a reduction in, or loss of, rental income. Disturbance will also affect the shoot and may the production of cover crops may be poor.	The Applicant notes the respondent's concerns regarding the temporary use of Plot 11-005 as a construction compound and the potential effects on agricultural operations, soil resources and the shooting enterprise. The likely significant effects on agricultural land use and soils have been assessed in Environmental Statement (ES) Chapter 12: Land use and agriculture [APP-091]. The assessment does not identify significant permanent effects on agricultural land resulting from the temporary use of this plot as a construction compound, though temporary construction activities may result in short term disruption to farming activities, access arrangements and estate operations, including shooting activities. Mitigation measures relating to access, drainage, soil management and reinstatement are secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) including the Outline Soil Resource Management Plan contained within Appendix B. The Applicant has committed to the protection, handling, storage and reinstatement of soil resources during construction. Following completion of the works, land will be

Reference	Theme	Issue raised	The Applicant's response
			reinstated in accordance with the committed mitigation measures to enable its return to its agricultural use. The Applicant will continue to engage with affected landowners and occupiers to minimise disruption where reasonably practicable during construction. Any claim for compensation arising from the acquisition or exercise of powers, or from construction related impacts, would be considered in accordance with the Compensation Code and assessed on the basis of reasonable and evidenced loss.
RR-258-31	Land and agriculture	Drawing reference (Examination Library number APP-010) Land Plan Land plots 11-006 Impacts of DCO: now Land is subject to an AHA and the proposed DCO may create uncertainty for the tenant and could adversely affect ongoing agricultural management and investment decisions.	The Applicant acknowledges concerns regarding uncertainty for the Agricultural Holdings Act (AHA) tenant and the potential implications for ongoing agricultural management. Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091] considered the likely significant effects of the Project on agricultural land use, including effects on farm operations, access arrangements, field severance, drainage, livestock movements and the operational capacity of individual farm holdings. ES Chapter 12 Land use and agriculture [APP-091] concludes that, given the short-term and temporary nature of pipeline installation, significant effects on the ongoing viability or operational capacity of farm holdings are not anticipated. Any effects on the operation and viability of farm holdings would be temporary and capable of being appropriately managed through the measures secured within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) [APP-413] and [APP-414] for documents 2 and 3. These commitments include maintaining access to farm tracks, provision of private farm access across the working corridor where feasible, and ongoing discussion and engagement with affected landowners and occupiers. Following construction, land would be reinstated to its pre-existing agricultural use in accordance with the Outline Soil Resource Management Plan (SRMP), contained within Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). The assessment in ES Chapter 12 Land use and agriculture [APP-091] also concludes that normal agricultural operations can resume following reinstatement and that the pipeline would not permanently remove land above the pipeline from agricultural use. The Applicant further confirms that compensation for any reasonable and substantiated losses arising from the acquisition or use of land for the Project would be assessed in accordance with the Compensation Code and considered on a case-by-case basis, subject to evidence and proof of loss
RR-258-32	Land use and agriculture	Land plots 11-006 Impacts of DCO: during construction Construction activities are likely to cause disturbance to the agricultural tenant, resulting in crop loss, loss of crop establishment costs, reduced yields, and	Please refer to the Applicant's response to RR-258-16. The Applicant acknowledges this comment. ES Chapter 12 Land use and agriculture [APP-091] considers temporary and permanent impacts on agricultural land use, including disruption to agricultural operations, loss of

Reference	Theme	Issue raised	The Applicant's response
		additional costs associated with reinstatement and re-establishment of farming operations. There will noise and dust which will cause disturbance to the tenant. Any proposed changes to the footpath will cause further disruption to the tenant and will again effect agricultural operations.	access or boundary features, and severance of agricultural fields. Engagement has been undertaken with landowners and occupiers to understand the extent and nature of land holdings and agricultural operations. The Applicant also acknowledges concerns regarding noise, dust and disturbance to agricultural operations during construction. Construction noise and vibration effects are assessed in ES Chapter 15 Noise and vibration, [APP-094] which concludes that the implementation of embedded and good practice mitigation measures would minimise temporary construction effects on nearby receptors. Commitments secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), ([APP-413] and [APP-414] for documents 2 and 3) include the maintenance of access to farm tracks and the provision of private farm access across the open-cut pipeline during construction, as required and where feasible, to mitigate field severance. Public Rights of Way (PRoW) are assessed in Chapter 18 Traffic and transport [APP-097]. The PRoW that cross the pipeline at the Roche Court Estate include Fareham 103 and Fareham 107. Temporary closures and diversions are required for these PRoW to facilitate the construction of the Project. Given that Fareham 103 is used by pedestrians for recreational purposes and there are other available routes, the receptor sensitivity at this location is medium. The Fareham 103 PRoW diversion would increase journeys by between 50-250m. This would result in effects of minor magnitude. As such, this temporary diversion would result in short-term effects of minor adverse significance (not significant). Similarly, Given that Fareham 107 is used by pedestrians for recreational purposes and there are other available routes, the receptor sensitivity at this location is medium. The Fareham 107 PRoW diversion would increase journeys between 50m and 250m, thus resulting in a minor impact. This would result in temporary, short-term effects of minor adverse significance (not significant). The Applicant also acknowledges concerns regarding the potential for temporary PRoW diversions to affect agricultural operations. Temporary closures and diversions of PRoW would be managed in accordance with the Access and Rights of Way Plans [APP-015 and APP-016 – 2 documents]. A Framework Rights of Way Management Plan (RoWMP), contained within Appendix B of the Framework CTMP [APP-415] has been prepared and outlines the temporary closures and diversions to the PRoW network associated with construction of the Project, together with measures to reduce impacts. Diversions would be provided where routes are temporarily closed. The Applicant further confirms that compensation for any reasonable and substantiated losses arising from the acquisition or use of land for the Project would be assessed in accordance with the Compensation Code and considered on a case-by-case basis, subject to evidence and proof of loss.

Reference	Theme	Issue raised	The Applicant's response
RR-258-33	Land use and agriculture	Land plots 11-006 Impacts of DCO: during operation The DCO may continue to affect the tenant's productivity and ability to farm the land effectively. If the land is returned to the Estate, operational restrictions may also limit the Estate's future use of the land and negatively. affect the viability and success of agricultural or alternative land uses. Soil quality is likely to be reduced, with potential long-term issues relating to soil structure and drainage, further affecting the land's productivity and value.	The Applicant notes the concern that the installation of a pipeline will adversely affect the practical use and productivity of the land during the operation of the Project. Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091] concluded that no significant operational effects on agricultural land use are anticipated following installation of the pipeline and reinstatement of the land. The pipeline will be installed to a minimum depth of 0.9m from the crown of the pipe and the original soil reinstated over the top. Construction of the Project will result in temporary disturbance to agricultural land. Following installation of the pipeline, disturbed land would be reinstated in accordance with the Outline Soil Resource Management Plan to support the return of agricultural use. The provisions of the Outline Soil Resources Management Plan (SRMP), as contained in Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), includes measures relating to soil stripping, storage, handling and reinstatement designed to maintain soil resources, protect soil structure and support the restoration of agricultural productivity following construction. The Applicant further confirms that compensation for any reasonable and substantiated losses arising from the acquisition or use of land for the Project would be assessed in accordance with the Compensation Code and considered on a case-by-case basis, subject to evidence and proof of loss.
RR-258-34	Land use and agriculture	Drawing reference (Examination Library number APP-010) Land Plan Land plots 11-007 Impacts of DCO: now Land is subject to an FBT and the proposed DCO may create uncertainty for the tenant and could adversely affect ongoing agricultural management and investment decisions.	The Applicant acknowledges concerns regarding uncertainty for the tenant and the potential implications for ongoing agricultural management and investment decisions. Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091] considered the potential impacts of the Project on agricultural land use, including effects on farm operations, access arrangements, field severance, drainage, livestock movements and the operational capacity of individual farm holdings. ES Chapter 12 Land use and agriculture [APP-091] concludes that, given the short-term and temporary nature of pipeline installation, significant effects on the ongoing viability or operational capacity of farm holdings are not anticipated. Any effects on the operation and viability of farm holdings would be temporary and capable of being appropriately managed through the measures secured within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Commitments secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) include maintaining access to farm tracks, provision of private farm access across the working corridor where feasible, and ongoing discussion and engagement with affected landowners and occupiers. Following construction, land would be reinstated to its pre-existing agricultural use in accordance with the Outline Soil Resource Management Plan, as contained in Appendix B of the Outline CEMP (Document reference 7.1, DCO

Reference	Theme	Issue raised	The Applicant's response
			Volume 7, Version 1 for document 1 of 3). Normal agricultural operations can then resume following reinstatement, meaning that the pipeline would not permanently remove land above the pipeline from agricultural use. The Applicant further confirms that compensation for any reasonable and substantiated losses arising from the acquisition or use of land for the Project would be assessed in accordance with the Compensation Code and considered on a case-by-case basis, subject to evidence and proof of loss.
RR-258-35	Land use and agriculture	Land plots 11-007 Impacts of DCO: during construction Construction activities and use of the land as a compound are likely to cause disturbance to the agricultural tenant, resulting in crop loss, loss of crop establishment costs, reduced yields, and additional costs associated with the reinstatement and re-establishment of farming operations. Noise, dust and general construction disturbance will adversely affect the tenant's use and management of the holding and may give rise to further operational impacts and associated costs.	Please refer to the Applicant's response to RR-258-16. Paragraphs 12.8.20 to 12.8.25 of Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091] consider the effects of the Project on agricultural land holdings, existing agricultural activities and land use receptors. The assessment includes consideration of the temporary and permanent use of land required for the Project and the potential effects on the operational capacity and viability of affected holdings. The Applicant has taken account of the existing use of the land within the assessment of likely significant effects. The assessment concludes that impacts on agricultural land use and farm holdings would be temporary and primarily associated with the construction phase. Following completion of construction, affected land would be reinstated in accordance with the Outline Soil Resource Management Plan contained within Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) enabling agricultural use to resume where reasonably practicable. Construction activities would be undertaken in accordance with the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3), which includes measures to control noise and vibration, including the development of a Noise and Vibration Management Plan by the Lead Contractor, and dust, including the development of a Dust Management Plan, during the construction period The Applicant further confirms that compensation for any reasonable and substantiated losses arising from the acquisition or use of land for the Project, including losses associated with agricultural operations, would be assessed in accordance with the Compensation Code and considered on a case-by-case basis, subject to evidence and proof of loss.
RR-258-36	Water environment	Land plots 11-007 Impacts of DCO: during construction The pipeline's proximity to the River Wallington, there is a risk of environmental impacts, including ecological disturbance, sedimentation, pollutant runoff entering the watercourse, and deterioration in water quality if construction activities are not appropriately managed and mitigated.	Please refer to the Applicant's response to RR-258-10.

Reference	Theme	Issue raised	The Applicant's response
RR-258-37	Land use and agriculture	Land plots 11-007 Impacts of DCO: during construction The compound site is also in close proximity to the water meadows and there is a risk that there may be flooding issues. The compound site covers a cover crop and so will greatly disturb the shoot.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be reinstated in accordance with the Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The Applicant acknowledges that the temporary use of land for the construction compound may affect existing agricultural and estate management activities during the construction phase, including the use of cover crops associated with shoot management. These effects would be temporary and confined to the construction period. Following completion of the works, land would be reinstated in accordance with the Outline SRMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). Potential flood risks arising from open-cut works on the floodplain of the River Wallington and its tributaries will be managed through the measures set out in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), including a commitment for the Contractor to prepare a Construction Drainage Plan to set out how it will manage the quality and quantity of construction stage drainage (WE4). Furthermore, Measure WE10 in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) sets out a detailed suite of measures that will be employed to manage flood risk where construction compounds are located in an area at risk of river or surface water flooding. These will include: • The Contractor will be obligated to produce a risk assessment to outline the measures required to ensure that the Project does not increase flood risk outside the site. • The Contractor will monitor water levels, sign up to the Environment Agency's flood warning system, and ensure that there is an emergency evacuation plan in place. • As per the Construction Insurance Risk Engineers Group (CIREG) guidance, the configuration of the compound should utilise an 'As Low As Reasonably Practicable' approach or similar to manage the risk of flooding. • Portacabins will be raised so that they are above the ground surface. • Machinery will be stored in areas of hard standing, remote from flood water or where not reasonably practicable, sufficiently constrained as not to wash away. • Materials will not be stored in functional flood plains (Flood Zone 3b), and best efforts will be made to avoid storage in Flood Zones 3a and 2.

Reference	Theme	Issue raised	The Applicant's response
			• Small-scale flow diversion and retention measures will be installed as part of the site drainage system to protect sensitive areas within the compound, without increasing flood risk elsewhere. • There will be no storage of soil or other materials on watercourse banks and where possible, spoil to be set back from watercourses by at least 8m (this prevents excessive loading on watercourse banks, reduces risk of stored material entering the watercourses, and retains access for flood risk management authorities). • Flood warning and evacuation measures, including safe access and egress routes, will be put in place to protect site users and off-site receptors. The Applicant further confirms that compensation for any reasonable and substantiated losses arising from the acquisition or use of land for the Project would be assessed in accordance with the Compensation Code and considered on a case-by-case basis, subject to evidence and proof of loss
RR-258-38	Land use and agriculture	Land plots 11-007 Impacts of DCO: during operation Use of the land as a construction compound may result in long term deterioration of soil quality following completion of the project, including potential contamination, increased compaction, and the risk of permanent damage to soil structure.	The Applicant notes the respondent's concern that use of the land as a construction compound may result in long term deterioration of soil quality, including compaction, contamination and damage to soil structure. Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091] assessed the likely significant effects of the Project on agricultural land and soils. The chapter concludes that installation of the pipeline and temporary construction compounds would result in a temporary disturbance to agricultural land during construction. However, the Applicant has committed to the protection, handling, storage and reinstatement of soil resources during construction through the Outline Soil Resource Management Plan (SRMP) contained within Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). Following completion of the works, the land would be reinstated in accordance with the SRMP to facilitate its return to agricultural use. The pipeline would be installed to a minimum depth of 0.9m from the pipeline crown to ground level and normal agricultural operations could then resume following reinstatement of the land. The assessment does not identify significant permanent effects on agricultural land resulting from the temporary use of this plot as a construction compound, including effects that would prevent the continued agricultural use of the land following reinstatement.
RR-258-39	Water environment	Land plots 11-007 Impacts of DCO: during operation There is also potential for adverse effects on existing land drainage systems, which could impact the future agricultural productivity of the holding.	Please refer to the Applicant's response to RR-258-29.
RR-258-40	Land use and agriculture	Land plots 11-007	The Applicant notes the respondent's concern that the temporary and permanent effects of the works may adversely affect the agricultural viability of

Reference	Theme	Issue raised	The Applicant's response
		Impacts of DCO: during operation The temporary and permanent effects of the works may adversely affect the agricultural viability of the land. This could restrict the Estate's ability to undertake planned rent reviews and may result in the termination of existing agricultural tenancies where the affected land is no longer considered productive for agricultural purposes. Consequently, the Estate may suffer a reduction in, or loss of, rental income. Disturbance will also affect the shoot and may the production of cover crops may be poor.	the land, including the potential for impacts on agricultural productivity, tenancy arrangements, rental income and shooting activities. The likely effects on agricultural land and soils have been assessed in Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091]. The Outline Soil Resource Management Plan (SRMP), contained within Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), sets out the measures that will be implemented to protect, handle, store and reinstate soil resources during construction. The temporary use of this plot as a construction compound would result in short term disruption during construction. Following completion of the works, the land would be reinstated in accordance with the committed mitigation measures to facilitate its return to agricultural use. The assessment does not identify significant permanent effects on agricultural land resulting from the temporary use of this plot as a construction compound, including effects that would prevent the continued agricultural use of the land following reinstatement. ES Chapter 12 Land use and agriculture [APP-091] concludes that temporary construction activities would not result in likely significant residual effects on the ongoing operation or viability of affected farm holdings. The Applicant will continue to engage with affected landowners and occupiers to minimise disruption to farming operations and estate activities during construction where reasonably practicable. Any claim for compensation arising from the acquisition or exercise of powers, or from construction related impacts, would be considered in accordance with the Compensation Code and assessed on the basis of reasonable and substantiated loss.
RR-258-41	Land use and agriculture	Drawing reference (Examination Library number APP-010) Land Plan Land plots 11-008 Impacts of DCO: now As above	Please refer to the Applicant's response to RR-258-34.
RR-258-42	Land use and agriculture	Land plots 11-008 Impacts of DCO: during construction As above. NB the cover crop is in 11-008	Please refer to the Applicant's response to RR-258-34.
RR-258-43	Land use and agriculture	Land plots 11-008 Impacts of DCO: during operation	The Applicant notes the representation and refers to the response to RR-258-42 in relation to temporary construction effects, soil handling and reinstatement.

Reference	Theme	Issue raised	The Applicant's response
		As above	Following completion of construction, the majority of land subject to temporary possession would be reinstated and returned to its previous agricultural use in accordance with the measures contained within the Outline Soil Resource Management Plan (SRMP), included as Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). The Contractor will implement the detailed SRMP(s) in accordance with the Outline SRMP to facilitate restoration of agricultural land and soil resources following construction. The operational effects on land use and agriculture are assessed in Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091]. The assessment concluded that, following reinstatement and implementation of mitigation measures, operational effects on agricultural land and farming activities would not be significant. These measures are contained within the Outline CEMP and are secured through the relevant requirements of the draft DCO [APP-023]. The Applicant therefore considers that appropriate measures are in place to protect soil resources, facilitate reinstatement and enable the return of temporarily affected land to agricultural use following construction.
RR-258-44	Land use and agriculture	Drawing reference (Examination Library number APP-010) Land Plan Land plots 11-009 Impacts of DCO now Land is subject to a FBT. The proposed DCO may create uncertainty for the tenant and could adversely affect ongoing agricultural management and investment decisions.	The Applicant acknowledges the concern that the Project may create uncertainty for the agricultural tenant in relation to the management and operation of the holding. The Applicant has undertaken engagement with landowners and occupiers throughout the development of the Project and will continue to engage with affected parties as the Project progresses. Temporary and permanent land requirements associated with the Project have been identified within the Development Consent Order application, including the Land Plans (Document reference 2.2, DCO Volume 2, Version 2). The likely significant effects of the Project on agricultural land and farming operations have been assessed in Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091]. The assessment concludes that, following reinstatement of land temporarily required for construction, there would be no significant residual effects on agricultural land use or farming operations. The Applicant further confirms that compensation for any reasonable and substantiated losses arising from the acquisition or use of land for the Project would be assessed in accordance with the Compensation Code and considered on a case-by-case basis, subject to evidence and proof of loss
RR-258-45	Land use and agriculture	Land plots 11-009 Impacts of DCO: during construction Construction activities are likely to cause disturbance to the agricultural tenant, resulting in crop loss, loss of crop establishment costs, with reinstatement and re-establishment of farming operations. There will noise and dust which will cause disturbance to the tenant and additional costs associated with	Please refer to the Applicant's response to RR-258-16. regarding temporary disturbance to agricultural operations, crop losses, reinstatement, noise and dust during construction. The Applicant further confirms that compensation for any reasonable and substantiated losses arising from the acquisition or use of land for the Project would be assessed in accordance with the Compensation Code and considered on a case-by-case basis, subject to evidence and proof of loss.

Reference	Theme	Issue raised	The Applicant's response
		reinstatement and re-establishment of farming operations. There will noise and dust which will cause disturbance to the tenant.	
RR-258-46	Land use a agriculture	Land plots 11-009 Impacts of DCO: during operation The DCO may continue to affect the tenant's productivity in relation to their use of the impacted land and ability to farm the land effectively (depending on surface structures, depth of equipment and precise location within the large (i.e. wide) working area. Soil quality is likely to be reduced, with potential long-term issues relating to soil structure and drainage, further affecting the land's productivity and value. The Estate may be unable to undertake planned rent reviews, and there is a risk that existing agricultural tenancies could beterminated if the affected land is no longer considered agriculturally productive. This could result in a reduction or loss of rental income to the Estate.	The Applicant notes the concern that the installation of a pipeline will adversely affect the practical use and productivity of the land during the operation of the Project. Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091] concludes that no significant operational effects on agricultural land use are anticipated following installation of the pipeline and reinstatement of the land. The pipeline will be installed to a minimum depth of 0.9m from the crown of the pipe and the original soil reinstated over the top. The construction of the Project will result in a temporary short-term disturbance to the agricultural land, which will be reinstated in accordance with the Outline Soil Resource Management Plan (SRMP), as contained in Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). The provisions of the Outline SRMP ensure that damage to soil is avoided or minimised, and that soil structures are maintained, such that the land can be reinstated to its original use as soon as practicable following the installation of the pipeline. The assessment concludes that following reinstatement, agricultural use of the land can continue and significant effects on the operation and viability of farm holdings are not anticipated. The Applicant further confirms that compensation for any reasonable and substantiated losses arising from the acquisition or use of land for the Project would be assessed in accordance with the Compensation Code and considered on a case-by-case basis, subject to evidence and proof of loss
RR-258-47	Land use and agriculture	Drawing reference (Examination Library number APP-010) Land Plan Land plots 11-010 Impacts of DCO now Land is subject to an AHA and the proposed DCO may create uncertainty for the tenant and could adversely affect ongoing agricultural management and investment decisions.	The Applicant acknowledges concerns regarding uncertainty for the Agricultural Holdings Act (AHA) tenant and the potential implications for ongoing agricultural management. Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091] considered the potential impacts of the Project on agricultural land use, including effects on farm operations, access arrangements, field severance, drainage, livestock movements and the operational capacity of individual farm holdings. ES Chapter 12 Land use and agriculture [APP-091] concludes that, given the short-term and temporary nature of pipeline installation, significant effects on the ongoing viability or operational capacity of farm holdings are not anticipated. Commitments secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) include maintaining access to farm tracks, provision of private farm access across the working corridor where feasible, and ongoing discussion and engagement with affected landowners and occupiers. The assessment states that it is not anticipated there would be any likely significant effects arising from ongoing farm viability issues that cannot be resolved through measures secured within the Outline CEMP, including

Reference	Theme	Issue raised	The Applicant's response
			ongoing discussion and negotiation. The significance of effect on farm holdings is therefore assessed as short-term, temporary and minor adverse, and not significant. Following construction, land would be reinstated to its pre-existing agricultural use in accordance with the Outline Soil Resource Management Plan, as contained in Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). ES Chapter 12 Land use and agriculture [APP-091] also confirms that normal agricultural operations can resume following reinstatement and that the pipeline would not permanently remove land above the pipeline from agricultural use.
RR-258-48	Landowner engagement	Land plots 11-010 Impacts of DCO: during construction Construction activities are likely to cause disturbance to the agricultural tenant, resulting in crop loss, loss of crop establishment costs, reduced yields, and additional costs associated with reinstatement and re-establishment of farming operations. There will be noise and dust which will cause disturbance to the tenant and additional costs associated with reinstatement and re-establishment of farming operations.	Please refer to the Applicant's response to RR-258-16.
RR-258-49	Land use and agriculture	Land plots 11-010 Impacts of DCO: during operation Construction activities are likely to cause disturbance to the agricultural tenant, resulting in crop loss, loss of crop establishment costs, reduced yields, and additional costs associated with reinstatement and reestablishment of farming operations. The Estate may be unable to undertake planned rent reviews, and there is a risk that existing agricultural tenancies could be terminated if the affected land is no longer considered agriculturally productive. This could result in a reduction or loss of rental income to the Estate.	The Applicant acknowledges concerns regarding potential disruption to agricultural operations during construction. These matters have been assessed in Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091]. The assessment acknowledges that agricultural land required temporarily for pipeline construction would be taken out of agricultural production for a short period; however, following installation, land would be restored to its pre-existing agricultural use, in accordance with the Outline Soil Resource Management Plan (SRMP) secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). ES Chapter 12 Land use and agriculture [APP-091] also considers potential impacts on agricultural land use, including disruption to access, livestock movements, field severance, water supplies and drainage. Commitments secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) include maintaining access where reasonably practicable, providing temporary crossing points across the working width where necessary, relocating livestock water supplies where required, and ongoing engagement with landowners and occupiers. The assessment concludes that impacts on agricultural land use would be short-term and temporary, with a minor adverse effect that is not significant. The Applicant further confirms that compensation for any reasonable and substantiated losses arising from the acquisition or use of land for the Project

Reference	Theme	Issue raised	The Applicant's response
			would be assessed in accordance with the Compensation Code and considered on a case-by-case basis, subject to evidence and proof of loss.
RR-258-50	Land use and agriculture	Drawing reference (Examination Library number APP-010) Land Plan Land plots 11-011 Impacts of DCO: now As above	Please refer to the Applicant's response to RR-258-44 and RR-258-47.
RR-258-51	Landowner engagement	Land plots 11-011 Impacts of DCO: during construction As above	Please refer to the Applicant's response to RR-258-16.
RR-258-52	Land use and agriculture	Land plots 11-011 Impacts of DCO: during operation As above	Please refer to the Applicant's response to RR-258-49.
RR-258-53	Land use and agriculture	Drawing reference (Examination Library number APP-010) Land Plan Land plots 11-012 Impacts of DCO: now As above Impacts of DCO: during operation As above	The Applicant refers to Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091], which assesses the potential effects of the Project on agricultural land and farming activities. The assessment concludes that, following reinstatement and implementation of the committed mitigation measures, temporary construction effects on agricultural land would not result in likely significant residual effects on the ongoing operation or viability of affected farm holdings. Following completion of construction, land subject to temporary possession would be reinstated in accordance with the detailed Soil Resource Management Plan(s) (SRMP) prepared by the Contractor in line with the Outline SRMP contained within Appendix B of the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). These measures include the protection, handling, storage and reinstatement of soil resources to facilitate the return of land to agricultural use following construction. Any claim for compensation arising from the acquisition or exercise of powers, or from construction related impacts, would be considered in accordance with the Compensation Code and relevant statutory provisions. The Applicant will continue to engage with affected landowners to address concerns and seek to agree practical solutions where reasonably practicable.

Reference	Theme	Issue raised	The Applicant's response
RR-258-55	Land use and agriculture	Land plots 11-012 Impacts of DCO: during construction As above	Please refer to the Applicant's response to RR-258-16 regarding temporary disturbance to agricultural operations, crop losses, reinstatement, noise and dust during construction.
RR-258-56	Landowner engagement	Drawing reference (Examination Library number APP-010) Land Plan Land plots 11-013 Impacts of DCO: now Land is subject to a Farm Business Tenancy. The proposed DCO may create uncertainty for the tenant and could adversely affect ongoing agricultural management and investment decisions.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming operations. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions.
RR-258-57	Land use and agriculture	Land plots 11-013 Impacts of DCO: during construction Construction activities are likely to cause disturbance to the agricultural tenant, resulting in crop loss, loss of crop establishment costs, with reinstatement and re-establishment of farming operations. There will noise and dust which will cause disturbance to the tenant and additional costs associated with reinstatement and re-establishment of farming operations. There will noise and dust which will cause disturbance to the tenant.	The Applicant acknowledges concerns regarding temporary disturbance during construction, including potential effects from construction noise and dust. Construction noise and vibration effects have been assessed in the Environmental Statement (ES) Appendix 15.1 Construction noise and vibration assessment [APP-179]. The nearest identified noise-sensitive receptor to Land Plot 11-013 is R36 (Albany Farm Care Home). The assessment predicts that construction works within Land Plots 11-019 and 11-020 would result in either negligible impacts for long-term works (>2 weeks) or adverse effects below the Lowest Observed Adverse Effect Level (LOAEL) for shorter-duration works (<2 weeks). Construction activities would be undertaken in accordance with the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3), which includes measures to control noise and vibration, including the development of a Noise and Vibration Management Plan by the Lead Contractor, and dust, including the development of a Dust Management Plan, during the construction period. Construction-phase noise and dust mitigation measures are contained within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3).
RR-258-58	Land use and agriculture	Land plots 11-013 Impacts of DCO: during operation The DCO may continue to affect the tenant's productivity and ability to farm the land effectively. If the land is returned to the Estate, operational restrictions	The Applicant notes the concern that installation of the pipeline may adversely affect the practical use and productivity of the land during operation of the Project.

Reference	Theme	Issue raised	The Applicant's response
		may also limit the Estate's future use of the land and negatively. affect the viability and success of agricultural or alternative land uses. Soil quality is likely to be reduced, with potential long-term issues relating to soil structure and drainage, further affecting the land's productivity and value.	Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091] assessed the potential effects of the Project on agricultural land use, including the productivity and operational capacity of agricultural holdings. The assessment concluded that, following reinstatement of land temporarily required for construction, no significant residual effects on agricultural land use or farming operations are anticipated. The pipeline will be installed to a minimum depth of 0.9m from the crown of the pipe and, following construction, disturbed land would be reinstated in accordance with the Outline Soil Resource Management Plan (SRMP) contained within Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). The SRMP includes measures relating to soil stripping, storage, handling and reinstatement designed to protect soil resources, maintain soil structure where reasonably practicable and support the restoration of agricultural productivity following construction. Following reinstatement, agricultural use of the land can continue and the assessment concludes that no significant operational effects on agricultural land use are anticipated.
RR-258-59	Land use and agriculture	Drawing reference (Examination Library number APP-010) Land Plan Land plots 11-014 Impacts of DCO: now Close proximity to Albany Business Centre will cause problems to the tenant and results in difficulty in rent review conversations, as the tenants become aware of the future proposed impact of the project on them. There is disturbance to the Estate for the need of various surveys which require access to be arranged.	The Applicant acknowledges this comment. ES Chapter 12 Land use and agriculture [APP-091] identifies Albany Business Centre as a cluster of businesses within the study area and considers potential effects on businesses arising from changes to the operating environment and impacts on access during construction. The assessment identifies that businesses at Albany Business Centre could experience temporary impacts associated with construction activities and traffic management measures on Chalk Lane. However, access to businesses would be maintained throughout the construction period and the assessment concludes that, with the implementation of embedded mitigation measures, effects on businesses would be minor adverse and not significant. A Framework Construction Traffic Management Plan (CTMP) [APP-415] has been prepared and includes measures to manage construction traffic and minimise disruption to access and business operations. The Applicant has undertaken consultation and engagement with landowners and occupiers to understand the extent and nature of land holdings and business operations and will continue to engage with affected parties throughout the Project. The Applicant confirms that compensation for any reasonable and substantiated losses arising as a result of the Project would be assessed in accordance with the Compensation Code and considered on a case-by-case basis, subject to evidence and proof of loss. The Applicant has endeavoured and will continue to mitigate the impact of its survey programmes on landowners. The Applicant undertook a comprehensive set of surveys in 2023, 2024 and 2025 to inform the Environmental Impact Assessment.

Reference	Theme	Issue raised	The Applicant's response
			Where possible, access for surveys was agreed with landowners via voluntary access licences. The Applicant will continue to engage with affected parties to seek to agree access where required by voluntary agreement where possible and aims to minimise disturbance to existing land uses as far as reasonably practicable.
=RR-258-60	Land use and agriculture	Land plots 11-014 Impacts of DCO: during construction The proposed works could result in a loss of rental income to the Estate, as it may be necessary to agree reduced rents or rent-free periods to reflect the significant disturbance arising from the construction of the pumping station. This will particularly cause disturbance to Albany Farmhouse who is currently let as a care home for disabled adults who need fulltime care.	The Applicant acknowledges this comment. Albany Farm Care Home is identified as a healthcare facility within the study area and is considered in ES Chapter 12 Land use and agriculture [APP-091]. The care home is located off the A32 Wickham Road and shares an access via Chalk Lane with Albany Farm Business Centre. Access to the construction compound for IPS-F (Work No. 5A) is via a new means of access, to be constructed within the Order Limits north of Albany Farm Business Park (Work No. 9A). Access to Albany Farm Care Home will therefore be maintained at all times and no construction traffic would pass in proximity to the care home. Albany Farm Care Home is considered to be a high-sensitivity receptor due to its occupants' high sensitivity to change and their continuous presence in the home. Access to the care home would be maintained at all times, and no construction traffic would use the access in front of or near to Albany Farm Care Home. The magnitude of the impact is therefore assessed as negligible, resulting in a minor adverse effect that would not be significant. Potential construction effects on the amenity of sensitive community facilities have also been considered through the in-combination assessment in ES Chapter 12 Land use and agriculture [APP-091]. This draws on the findings of the relevant assessments of air quality and odour, landscape and visual effects, noise and vibration, and traffic and transport. Taking account of these assessments and the embedded mitigation, Chapter 12 Land use and agriculture [APP-091] concludes that construction would result in, at most, minor adverse and not significant in-combination effects on the amenity of community receptors. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) includes commitments for ongoing engagement with affected landowners and occupiers, and for disruption during construction to be kept to a practicable minimum. Where it is determined that business operations, land use activities or other functions linked to affected land or structures would be affected or interrupted, compensation is payable in accordance with the relevant provisions of the DCO and the statutory compensation code. The Applicant acknowledges the concern regarding potential impacts on rental income arising from construction activities associated with the Project. Where interests in land are affected by the acquisition or use of land for the Project, compensation would be considered in accordance with the relevant provisions of the DCO and the Compensation Code. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of the Project, in accordance with the

Reference	Theme	Issue raised	The Applicant's response
			Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-258-61	Landowner engagement	Land plots 11-014 Impacts of DCO: during construction Such disturbance is expected to include noise, dust, increased traffic movements, the construction of the pumping station, and the use of the Albany Business Centre access route.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. The Applicant confirms that protection for access, drainage and soils included within the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and the Outline Soil Resource Management Plan at Appendix B therein. The Project has been designed to maintain access to Albany Business Centre throughout construction and operation. Whilst Albany Business Centre is identified as a receptor that may experience temporary indirect effects associated with traffic management measures on Chalk Lane during construction, these effects are assessed as minor adverse and not significant. A key mitigation measure is that construction access to IPS-F and the associated construction compounds would utilise a separate temporary construction access from Chalk Lane, rather than routing construction traffic through Albany Business Centre. The Albany Business centre access road is included in the Order Limits as an option for operational vehicles to access IPS-F once a week, once constructed. Construction vehicles would access to IPS-F and the associated construction compounds directly from Chalk Lane to the north of Albany Farm. This is controlled through the Framework CTMP [APP-415], the Access and Rights of Way Plans [APP-015] and Schedule 1 to the Draft Development Consent Order [APP-023]. In addition, the Framework CTMP [APP-415] and Traffic Management Strategy (TMS) [APP-416] include measures to minimise disruption, including managed traffic controls (section 6 of the CTMP), a sequential approach to road closures where practicable (TMS - referenced throughout), traffic marshals at temporary access points (paragraph 6.3.2 of the CTMP), appropriate visibility splays (section 5.1 of the CTMP), advance signing (section 5.9 of the CTMP), and temporary traffic management arrangements designed in accordance with relevant guidance (section 2.3 of the TMS). Accordingly, whilst temporary traffic impacts on Chalk Lane may occur during construction, ES Chapter 18 Traffic and transport [APP-097] concludes that access to Albany Business Centre would be maintained and that residual effects would be minor adverse and not significant. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.

Reference	Theme	Issue raised	The Applicant's response
RR-258-62	Land use and agriculture	Land plots 11-014 Impacts of DCO: during construction The works are also likely to disrupt agricultural operations, potentially affecting crop production and resulting in reduced harvest yields and associated financial losses.	Land Plot 11-014 is required for IPS-F (Work No. 5A). ES Chapter 12 Land use and agriculture [APP-091] confirms that the land affected is classified as Subgrade 3b quality. ES Chapter 12 Land use and agriculture [APP-091] confirms that the loss to agriculture and therefore to crop production and harvest yields will be permanent and irreversible, but concludes that this loss represents a minor adverse effect on agricultural land and is not significant. Where construction activities affect agricultural business operations, land use activities or associated functions, engagement with affected parties would continue throughout the construction period and compensation would be payable in accordance with the relevant provisions of the DCO and the statutory compensation code.
RR-258-63	Construction impacts and effects	Land plots 11-014 Impacts of DCO: during construction Land plots 11-014 Impacts of DCO: during construction The proposal would constrain access to the affected land and to adjoining land parcels that are accessed via the Albany Business Centre access track. The use of this access route for construction purposes may restrict or impede the Estate's ability to access and manage these areas effectively, leading to further operational and agricultural impacts.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. The Applicant can advise that ES Chapter 12 Land use and agriculture [APP-091], drawing on the findings of ES Chapter 18 Traffic and transport [APP-097], concludes that access to Albany Business Centre would be maintained. In addition, the Framework Construction Traffic Management Plan (CTMP) [APP-415] and Traffic Management Strategy (TMS) [APP-416] include measures to minimise disruption, including managed traffic controls, outlined in section 6 of the CTMP; a sequential approach to road closures where practicable; traffic marshals at temporary access points, outlined in paragraph 6.3.2 of the CTMP; appropriate visibility splays, outlined in section 5.1 of the CTMP; advance signing, outlined in section 5.9 of the CTMP, and temporary traffic management arrangements designed in accordance with relevant guidance, as outlined in section 2.3 of the TMS. Accordingly, whilst temporary traffic impacts on Chalk Lane may occur during construction, ES Chapter 12 Land use and agriculture [APP-091] concludes that access to Albany Business Centre would be maintained and that residual effects would be minor adverse and not significant. The Applicant has also made a specific commitment relating to maintaining access for landowners where reasonably practicable, which is secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This measure is outlined at reference Mit-GT 248 in ES Appendix 5.5 Commitments Register [Document reference 6.2, DCO Volume 6, Version 1].
RR-258-64	Traffic and transport	Land plots 11-014 Impacts of DCO: during construction In particular, this Plot includes part of the track (shown coloured yellow in the plan below) that runs from Albany business park (forming part of the Southwick Estate in separate but connected ownership) to Pook Lane to the south. Works	The Applicant acknowledges the Registered Proprietors of Land at Roche Court Estate's feedback regarding the permissive access route between Pook Lane and Albany Business Park. The Traffic Management Strategy (TMS) [APP-416] provides a commitment to provide continued access to residents whose access to properties is affected by the construction phase of the Project. Mitigation measures could include

Reference	Theme	Issue raised	The Applicant's response
		have been carried out to improve the track to allow for the access for private vehicles. Other than its requirement for an agricultural access, this track is also the designated emergency egress for properties on Pook Lane (which are located on the Roche Court Estate Land) to the west of the River Wallingford. As part of the almost completed M27 Junction 10 works being delivered as part of the construction of the Welborne Garden Village development, the works have severed the access from Pook Lane to the A32. As a result, these properties get cut off in times of flood and this route (shown in yellow below) is their only access in times of flood, which occurs 2 or 3 times a year. This access is a permissive right granted over the Roche Court Estate to these Pook Lane Residents, who are tenants of the Estate (and so it would not be evident on a review of LR title documents).	temporary plates to provide vehicular access, or the creation of temporary tracks for out of hours access. Furthermore, the TMS and section 6.4 of the Framework Construction Traffic Management Plan (CTMP) [APP-415] states that an out of hours phone number for residents to contact should access to their property be impacted by construction works will be provided during the construction phase. The Framework Rights of Way Management Plan (RoWMP), Appendix B to the Framework CTMP [APP-415] provides details of Public Rights of Way (PRoW) and permissive paths that are subject to management measures during the construction and operational phase of the Project. Mitigation measures set out within this document are also contained within the Access and Public Rights of Way Plan. Sheet 12 of the Access and Rights of Way Plans and section 6.3 of the Framework RoWMP provides details of proposals for the access track extending east from Albany Business Park. Works are proposed which would upgrade this access track. To the south, the PRoW and permissive path would be temporarily diverted during the construction phase and would be unaffected during the operational phase.
RR-258-65	Noise and vibration	Land plots 11-014 Impacts of DCO: during operation Once the site is in operation, depending on the noise and vibration disturbance from the site, it could have an impact on the adjoining farmland, the commercial tenancies at Albany Business Park or the residential care home at Albany Farmhouse.	The likely noise effects of IPS-F (based on worst case assumptions) are assessed in ES Chapter 15 Noise and vibration [APP-094]. Table 15-39 shows that the threshold for likely significant effects is anticipated to be exceeded at FR2 close to IPS-F (and closer to IPS-F than Albany Business Park or the residential care home at Albany Farmhouse); hence, without mitigation, effects on this Noise and Vibration Sensitive Receptors (NVSR) are temporary, long-term and likely significant. AGP emergency generator operational noise effects are temporary, long-term and not significant at any other NVSRs. As likely significant effects are predicted at FR2, secondary mitigation measures have been identified in ES Appendix 15.3 Operational noise assessment [APP-181]. With this mitigation the potential for noise disturbance at Albany Business Park or the residential care home at Albany Farmhouse would be very unlikely. No significant operational vibration sources are proposed, and the route is circa 300m from the NVSRs. As such, the potential for vibration disturbance at Albany Business Park or the residential care home at Albany Farmhouse is negligible.
RR-258-66	Location of AGP	Land plots 11-014 Impacts of DCO: during operation There could be temporary or permanent rent reductions or rent free periods, limited on completing land rent reviews/there may be a cap on rents on commercial rents or a difficulty to find tenants to let commercial tenants due to the close proximity of the pumping station which could cause noise and visual	ES Chapter 12 Land use and agriculture [APP-091] provides an assessment of the Project on Albany Farmhouse (titled Albany Farm Care Home in the ES) in line with the EIA Scoping Opinion [APP-105] issued by the Planning Inspectorate in August 2023. The EIA Scoping Opinion [APP-105] identified that all direct and indirect operational impacts of the Project on community land and facilities, and commercial property is scoped out of the assessment, on the basis the nature and characteristics of the Project are unlikely to result in significant effects.

Reference	Theme	Issue raised	The Applicant's response
		disturbance. Especially as Albany Farmhouse who is currently let as a care home for disabled adults who need fulltime care.	ES Chapter 15 Noise and vibration [APP-094] assessed that the operation of the Project would result in a minor effect (not significant) on Albany Farm Care Home. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions.
RR-258-67	Location of AGP	Land plots 11-014 Impacts of DCO: during operation The field where the pumping station is situated will also sever part of the field which will no longer be suitable for agricultural production which therefore causes a further loss for the Estate.	Land Plot 11-014 is proposed for the siting of IPS-F which would result in a permanent land take requirement of 0.632ha. ES Chapter 12 Land use and agriculture [APP-091] confirms that the land affected is classified as Subgrade 3b quality, and that the loss to agriculture and therefore to crop production and harvest yields will be permanent and irreversible, but concludes that this loss represents a minor adverse effect on agricultural land and is not significant. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions.
RR-258-68	Landscape and visual	Land plots 11-014 Impacts of DCO: during operation The pumping station location will also have a visual impact on the residential development as well as causing severe noise pollution. This could severely affect sales of the residential properties which are being developed.	The likely visual effects of Intermediate Pumping Station F (IPS-F) are assessed in Environmental Statement (ES) Chapter 13 Landscape and Visual [APP-092]. The assessment considers future residents of Welborne Garden Village within the future baseline and year 15 operation scenarios. IPS-F has been designed to maximise separation from Welborne Garden Village and incorporates embedded mitigation measures, including landscape screening and woodland, scrub and hedgerow planting to assist with landscape integration and visual screening. The assessment concludes that, following establishment of the proposed mitigation planting, the residual visual effect on future residents of the northern edge of Phase 5 of Welborne Garden Village would be minor adverse and not significant. Landscape and visual mitigation would be secured through the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) and the Outline Landscape and Ecology Management Plan (LEMP) [Document reference 7.5, DCO Volume 7, Version 1]. The likely noise effects of IPS-F (based on worst case assumptions) are assessed in ES Chapter 15 Noise and vibration [APP-094]. Table 15-39 shows that the threshold for likely significant effects is anticipated to be exceeded at FR2 close to IPS-F; hence, without mitigation, effects on this NVSR are temporary, long-term and likely significant. Above Ground Plant emergency generator operational noise effects are temporary, long-term and not significant at any other NVSRs. As likely significant effects are predicted, secondary mitigation measures have been identified in ES Appendix 15.3 Operational noise assessment [APP-181]. The residual operational noise effects at all NVSRs are no worse than permanent and minor i.e. not significant.

Reference	Theme	Issue raised	The Applicant's response
			Secondary mitigation measures are secured via the 'Site Specific Design Principle' (SSDP) for work site IPS-F, provided in the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1), stating: *"Detailed design will ensure that operational noise levels at noise sensitive receptors do not exceed the Lowest Observed Adverse Effect Level, as identified in ES Chapter 15 Noise and vibration. Mitigation measures will be adopted according to the following mitigation hierarchy..."* This SSDP provide a level of surety that the noise from operation of the Project will not adversely affect residential property or cause a loss of amenity.
RR-258-69	Land use and agriculture	Land plots 11-014 Impacts of DCO: during operation The pumping station may result in long-term impacts on surrounding agricultural land through soil compaction, erosion, altered drainage, and potential contamination, which could reduce soil quality. The operation would permanently sever the link referred to in the 'during construction' section for this Plot over the track shown coloured yellow on the plan. We cannot see that mitigation has been proposed in respect of this access. [MAP]	Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091] concludes that, with the implementation of the Outline Soil Resource Management Plan (SRMP), soils would be handled, stored and reinstated in accordance with good practice so that they can continue to perform the same functions as before construction, through avoidance of damage by compaction, smearing and mixing of incompatible soil types, as well as by maintaining soil structures and quality as far as possible The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) contains a series of controls to manage erosion, run-off of mud/soil, potential contamination events and drainage. In relation to access, ES Chapter 12 Land use and agriculture [APP-091] recognises the potential for disruption to agricultural land use arising from loss of access and field severance and includes commitments within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) for the maintenance of access to farm tracks and the provision of private farm access during construction where feasible. The 'Location of Above Ground Plant' area does not overlap with the existing tracks to the south and east. Design principle IPS-F_10 (see the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) proposes woodland planting to the south-east of IPS-F, it makes provision for continued use of the farm track in this area. As such, access will be maintained to the remaining field within which IPS-F sits. The permanent above-ground infrastructure has been designed to minimise land take, and normal agricultural operations can resume on land above the buried pipeline outside the footprint of the pumping station.
RR-258-70	Traffic and transport	Drawing reference (Examination Library number APP-010) Land Plan Land plots 11-015 Impacts of DCO: now As above	Please refer to the Applicant's response to RR-258-59

Reference	Theme	Issue raised	The Applicant's response
RR-258-71	Land use and agriculture	Land plots 11-015 Impacts of DCO: during construction In addition to the reasons set out above, there are particular concerns regarding access to this land and the potential restriction of access to other areas that are reached via this estate. There is also significant concern that the access track may be damaged as a result of the substantial volume of HGV traffic and heavy machinery that would be required during the works. The track was not designed or constructed to accommodate such intensive use, and there is a real risk of deterioration, damage, and disruption to those who rely on it for access.	The Applicant acknowledges the concern regarding access to land plots 11-015 during construction. ES Chapter 12 Land use and agriculture [APP-091] considers temporary impacts on access and agricultural land use, including loss of access, disruption to land management activities and field management. Commitments secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), ([APP-413] and [APP-414] for documents 2 and 3) include the maintenance of access to farm tracks and the provision of private farm access across the open-cut pipeline during construction as required and where feasible to mitigate field severance. Stiles, gates or gaps will be incorporated into temporary fencing where reasonably practicable to maintain access for landowners and occupiers, and additional access points may be provided by agreement with the landowner or occupier where reasonably practicable. The Applicant will continue to engage with affected landowners and occupiers regarding construction phasing, access requirements and any necessary temporary arrangements to reduce disruption as far as reasonably practicable. Given the short-term and temporary nature of the construction works, ES Chapter 12 Land use and agriculture [APP-091] concludes that it is not anticipated there would be any likely significant effects arising from impacts on agricultural land use that could not be resolved through the measures secured within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), ([APP-413] and [APP-414] for documents 2 and 3) and ongoing discussion and negotiation with affected parties. ES Chapter 18 Traffic and transport [APP-097] assesses the effects of construction traffic and temporary road closures. A Framework CTMP [APP-415]. has been prepared and submitted as part of the DCO application and provides detail on construction traffic management measures that will be implemented during construction to reduce construction traffic impacts and the potential for disruption to access. A temporary access is proposed directly with Chalk Lane for construction vehicles. The existing private accesses track would not be used by HGVs to access the temporary construction compounds. The Applicant does not anticipate that the use of Plot 11-015 would result in the loss of access to other parts of the Estate. The existing private access track would not be used by HGVs to access the temporary construction compounds, with construction traffic accessing the works via a temporary access directly from Chalk Lane. The Applicant will continue to engage with the landowner regarding access arrangements during construction and will seek to maintain access to adjoining land parcels where reasonably practicable. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of the Project, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-258-72	Traffic and transport	Land plots 11-015	The Applicant acknowledges the concern regarding access to land plot 11-015 during operation. As shown on the Access and Public Rights of Way (PRoW)

Reference	Theme	Issue raised	The Applicant's response
		Impacts of DCO: during operation As above but particular concern with the access route, causing problems with limiting access via this route.	Plans - 2 of 2 documents (Sheet 12) [APP-016], Land Plot 11-015 has been included in the Order Limits solely for the temporary diversion of a PRoW during the construction period. This temporary footpath diversion would be limited to part of the construction period and there would be no impacts on this land in the operation stage.
RR-258-73	Traffic and transport	Drawing reference (Examination Library number APP-010) Land Plan Land plots 11-016 Impacts of DCO: now As above	Please refer to the Applicant's response to RR-258-59
RR-258-74	Land use and agriculture	Land plots 11-016 Impacts of DCO: during construction As above and any changes of footpaths will cause further disruption to access and may result in trespassing if footpath is shut	The Applicant acknowledges this comment. Potential impacts on Public Rights of Way (PRoW), including temporary closures and diversions during construction, have been assessed in ES Chapter 17 Socio-economics, tourism and health [Document reference 6.1, DCO Volume 6, Version 1] and ES Chapter 18 Traffic and transport [APP-097]. The assessment considers the potential for temporary disruption to access to green space, recreation and physical activity arising from PRoW closures and diversions. A Framework Rights of Way Management Plan (RoWMP), contained within Appendix B of the Framework CTMP [APP-415] has been prepared and outlines the temporary closures and diversions to the PRoW network associated with construction of the Project, together with measures to reduce impacts. Diversions would be provided where routes are temporarily closed. As shown on the Access and Rights of Way Plans (Sheet 12) [APP-016], Land Plot 11-016 has been included in the Order Limits solely for the temporary diversion of a PRoW during the construction period. The Applicant would seek to ensure temporary closures and diversions are clearly communicated and appropriately managed in accordance with the Framework RoWMP in order to maintain access and minimise disruption during construction.
RR-258-75	Traffic and transport	Land plots 11-016 Impacts of DCO: during operation As above	The Applicant acknowledges the Registered Proprietors of Land at Roche Court Estate's feedback regarding potential impacts associated with Land plot 11-016. As shown on the Access and Public Rights of Way (PRoW) Plans - 2 of 2 documents (Sheet 12) [APP-016], Land Plot 11-016 has been included in the Order Limits solely for the temporary diversion of a PRoW during the construction stage. There would be no impact on this land associated with the Project during operation.

Reference	Theme	Issue raised	The Applicant's response
RR-258-76	Traffic and transport	Drawing reference (Examination Library number APP-010) Land Plan Land plots 11-017 Impacts of DCO: now As per 11-015	The Applicant acknowledges the Registered Proprietors of Land at Roche Court Estate's feedback regarding potential impacts associated with Land plot 11-017. As shown on the Access and Public Rights of Way (PRoW) Plans - 2 of 2 documents (Sheet 12) [APP-016], Land Plot 11-016 has been included in the Order Limits solely for the temporary diversion of a PRoW during the construction period. The Framework Rights of Way Management Plan (RoWMP) (Appendix B to the Framework Construction Traffic Management Plan) [APP-415] provides details of PRoW and permissive paths that are subject to management measures during the construction and operational phase of the Project. Mitigation measures set out within this document are also contained within the Access and PRoW Plan [APP-015 and APP-016 – 2 documents].
RR-258-77	Land use and agriculture	Land plots 11-017 Impacts of DCO: during construction As per 11-015	The Applicant acknowledges this comment. Potential impacts on Public Rights of Way (PRoW), including temporary closures and diversions during construction, have been assessed in Environmental Statement (ES) Chapter 17 Socio-economics, tourism and health [Document reference 6.1, DCO Volume 6, Version 1] and ES Chapter 18 Traffic and transport [APP-097]. The assessment considers the potential for temporary disruption to access to green space, recreation and physical activity arising from PRoW closures and diversions. A Framework Rights of Way Management Plan (RoWMP) contained within Appendix B of the Framework Construction Traffic Management Plan (CTMP) [APP-415] has been prepared and outlines the temporary closures and diversions to the PRoW network associated with construction of the Project, together with measures to reduce impacts. Diversions would be provided where routes are temporarily closed. As shown on the Access and Rights of Way Plans (Sheet 12) [APP-016], Land Plot 11-017 has been included in the Order Limits solely for the temporary diversion of a PRoW during the construction period. There would be no impact on this land associated with the Project during operation. The Applicant would seek to ensure temporary closures and diversions are clearly communicated and appropriately managed in accordance with the Framework RoWMP [APP-415] in order to maintain access and minimise disruption during construction
RR-258-78	Traffic and transport	Land plots 11-017 Impacts of DCO: during operation As above	The Applicant acknowledges the Registered Proprietors of Land at Roche Court Estate's feedback regarding potential impacts associated with Land plot 11-017. As shown on the Access and Public Rights of Way (PRoW) Plans - 2 of 2 documents (Sheet 12) [APP-016], Land Plot 11-016 has been included in the Order Limits solely for the temporary diversion of a PRoW during the construction stage. There would be no impact on this land associated with the Project during operation.

Reference	Theme	Issue raised	The Applicant's response
RR-258-79	Socio-economic, tourism and health	Drawing reference (Examination Library number APP-010) Land Plan Land plots 11-019 Impacts of DCO: now Close proximity to Albany Business Centre will cause problems to the tenant and results in difficulty in rent review conversations. There is disturbance to the Estate for the need of various surveys which require access to be arranged.	The Applicant acknowledges this comment. Albany Business Centre is identified as a cluster of businesses within the study area and has been considered within ES Chapter 12 Land use and agriculture [APP-091]. The assessment considers effects on businesses from impacts on local road networks and changes in their operating environment. ES Chapter 12 Land use and agriculture [APP-091] identifies that businesses at Albany Business Centre could experience temporary impacts on access associated with road closures on Chalk Lane during construction. However, access to businesses would be maintained at all times. The assessment concludes that, given the short-term nature of the impact and the measures to reduce disruption, the magnitude of the impact is minor, resulting in a minor adverse effect which is not significant. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of the Project, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss. The Applicant has endeavoured and will continue to mitigate the impact of its survey programmes on landowners. The Applicant undertook a comprehensive set of surveys in 2023, 2024 and 2025 to inform the Environmental Impact Assessment. Landowners were notified in advance of survey visits and whilst the Applicant intended to undertake surveys as per the planned programme of works, circumstances arose that required changes to be made to the timings. For example, adverse weather conditions resulted in last-minute changes and a need for additional and supplementary survey requirements arose following observations made during surveys undertaken. All surveys were undertaken at the appropriate time of year, with seasonal ecological surveys undertaken during the appropriate seasons which resulted in multiple visits to the same holdings. However, the Applicant endeavoured to consolidate survey visits where possible to reduce multiple visits by different survey teams to the same land. A comprehensive set of survey data is necessary to inform the Environmental Impact Assessment and ensure the land impacted by the Project is fully understood and appropriately mitigated. The Applicant considers the volume of survey activity to have been proportionate in order to provide a robust assessment. Where possible, access for surveys was agreed with landowners via voluntary access licences. An upfront payment was made ahead of survey access being undertaken to reflect any potential losses suffered as a result of the survey works, but landowners were able to make a claim if losses exceeded that initial payment. The Applicant will continue to engage with affected parties to seek to agree access where required by voluntary agreement where possible and aims to minimise disturbance to existing land uses as far as reasonably practicable.

Reference	Theme	Issue raised	The Applicant's response
RR-258-80	Landowner engagement	Land plots 11-019 Impacts of DCO: now Survey works undertaken on the Estate have resulted in disturbance to game cover areas, which has adversely affected the operation and management of the shoot.	The Applicant has endeavoured and will continue to mitigate the impact of its survey programmes on landowners. The Applicant undertook a comprehensive set of surveys in 2023, 2024 and 2025 to inform the Environmental Impact Assessment. Landowners were notified in advance of survey visits and whilst the Applicant intended to undertake surveys as per the planned programme of works, circumstances arose that required changes to be made to the timings. For example, adverse weather conditions resulted in last-minute changes and a need for additional and supplementary survey requirements arose following observations made during surveys undertaken. All surveys were undertaken at the appropriate time of year, with seasonal ecological surveys undertaken during the appropriate seasons which resulted in multiple visits to the same holdings. However, the Applicant endeavoured to consolidate survey visits where possible to reduce multiple visits by different survey teams to the same land. A comprehensive set of survey data is necessary to inform the Environmental Impact Assessment and ensure the land impacted by the Project is fully understood and appropriately mitigated. The Applicant considers the volume of survey activity to have been proportionate in order to provide a robust assessment. Where possible, access for surveys was agreed with landowners via voluntary access licences. An upfront payment was made ahead of survey access being taken to reflect any potential losses suffered as a result of the survey works, but landowners were able to make a claim if losses exceeded that initial payment. The Applicant will continue to engage with affected parties to seek to agree access where required by voluntary agreement where possible and aims to minimise disturbance to existing land uses as far as reasonably practicable.
RR-258-81	Location of the proposed pipeline routes	Land plots 11-019 Impacts of DCO: now The pipeline also makes it difficult to plan SFI, environmental schemes, cropping rotations and potential diversification (i.e. drives and game covers) and hedge and tree planting.	This land is proposed for the development of IPS-F (Work No. 5A). As detailed within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with the respondent's land agent on Heads of Terms to acquire this land voluntarily. Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-258-82	Landowner engagement	Land plots 11-019 Impacts of DCO: during construction	The Applicant is seeking to acquire plot 11-019 for the construction of Intermediate Pumping Station F (IPS-F) within Work No. 5A on the Works Plans [AS-008]. As detailed within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has

Reference	Theme	Issue raised	The Applicant's response
		The proposed works could result in a loss of rental income to the Estate, as it may be necessary to agree reduced rents or rent-free periods to reflect the significant disturbance arising from the construction of the pumping station. The impact of the works on this Plot will particularly cause disturbance to Albany Farmhouse (the neighbouring property in separate but connected ownership, forming part of the Southwick Estate) who is currently let as a care home for disabled adults who need fulltime care. Such disturbance is expected to include noise, dust, increased traffic movements, the construction of the pumping station, and the use of the Albany Business Centre access route. The works are also likely to disrupt agricultural operations, potentially affecting crop production and resulting in reduced harvest yields and associated financial losses. The proposal would constrain access to the affected land and to adjoining land parcels that are accessed via the Albany Business Centre access track. The use of this access route for construction purposes may restrict or impede the Estate's ability to access and manage these areas effectively, leading to further operational and agricultural impacts. Any proposed changes to the footpath will cause further disruption and will again effect agricultural operations.	undertaken engagement with the respondent's land agent on Heads of Terms to acquire this land voluntarily. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss. Please refer to the Applicant's response to RR-258-60 for further details regarding how the Albany Farm Care Home is considered in ES Chapter 12 Land use and agriculture [APP-091]. The Project has been designed to maintain access to Albany Business Centre throughout construction and operation. Whilst Albany Business Centre is identified as a receptor that may experience temporary indirect effects associated with traffic management measures on Chalk Lane during construction, these effects are assessed as minor adverse and not significant. A key mitigation measure is that construction access to IPS-F and the associated construction compounds would utilise a separate temporary construction access from Chalk Lane, rather than routing construction traffic through Albany Business Centre. The Albany Business centre access road is included in the Order Limits as an option for operational vehicles to access IPS-F once a week, once constructed. Construction vehicles would access to IPS-F and the associated construction compounds directly from Chalk Lane to the north of Albany Farm. This is controlled through the Framework CTMP [APP-415], the Access and Rights of Way Plans [APP-015] and Schedule 1 to the draft DCO [APP-023]. In addition, the Framework CTMP [APP-415] and Traffic Management Strategy (TMS) [APP-416] include measures to minimise disruption, including managed traffic controls (section 6 of the CTMP), a sequential approach to road closures where practicable (TMS - referenced throughout), traffic marshals at temporary access points (paragraph 6.3.2 of the CTMP), appropriate visibility splays (section 5.1 of the CTMP), advance signing (section 5.9 of the CTMP), and temporary traffic management arrangements designed in accordance with relevant guidance (section 2.3 of the TMS). Accordingly, whilst temporary traffic impacts on Chalk Lane may occur during construction, ES Chapter 18 Traffic and transport [APP-097] concludes that access to Albany Business Centre would be maintained and that residual effects would be minor adverse and not significant.
RR-258-83	Location of AGP	Land plots 11-019 Impacts of DCO: during operation Permanent rent reduction, limited on completing rent reviews/there may be a cap on rents on commercial rents or a difficulty to find tenants to let commercial tenants due to the close proximity of the pumping station which could cause noise and visual disturbance. Especially as Albany Farmhouse who is currently let as a care home for disabled adults who need fulltime care. The field where the pumping station is situated will also sever part of the field so that the remainder of the field adjoining the operation will no longer be	Please refer to the Applicant's response to RR-258-66. As per design principle IPS-F_1 (see the Design Principles Document [APP-076]), the footprint of the final IPS-F site will be located within the 'Location of Above Ground Plant' area as outlined in green on the IPS-F Design Principles Plan provided in Appendix A of the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). The 'Location of Above Ground Plant' area does not overlap with the existing tracks to the south and east. Design principle IPS-F_10 (see the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1)) proposes woodland planting to the south east of IPS-F, it makes provision for continued use of the farm track in

Reference	Theme	Issue raised	The Applicant's response
		suitable for agricultural production (leading to a loss of approximately 3 ha of agricultural production.	this area. As such, access will be maintained to the remaining field within which IPS-F sits.
RR-258-84	Landscape and visual	Land plots 11-019 Impacts of DCO: during operation The pumping station location will also have a visual impact on the residential development as well as causing severe noise pollution. This could severely affect sales of the residential properties which are being developed.	Please refer to the Applicant's response to RR-258-68
RR-258-85	Land use and agriculture	Land plots 11-019 Impacts of DCO: during operation Future risk of potential contamination generally (as a result of operational failure) or from planned future discharges into adjoining ditches from the pumping station may result in long-term impacts on surrounding agricultural land through soil compaction, erosion, altered drainage, and potential contamination, which could reduce soil quality.	The Applicant acknowledges concerns regarding potential effects on surrounding agricultural land arising from the operation of the Project. No planned operational discharges to the environment are proposed at the IPS sites or along the pipeline, noting the risk of introducing invasive non-native species (INNS). Any significant uncontrolled discharge would therefore be unexpected during operation of the Project and would be managed through the measures secured in the OEMP [APP-422]. ES Chapter 12 Land use and agriculture [APP-091] scoped operational effects on soils out of full assessment on the basis that significant effects on soils during operation are unlikely. The assessment confirms that there would be no permanent loss of agricultural land above the buried pipeline and that normal agricultural operations may resume following reinstatement. Paragraph 12.8.11 states that there would be no restriction on normal agricultural operations above the pipeline and that permanent losses are restricted to the footprint of the above ground plant. The Outline Soil Resource Management Plan, contained within Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), includes measures for the handling, storage and reinstatement of soils during construction to support the continued functioning of soil resources following reinstatement. Should maintenance or repair works be required that result in disturbance to soils, good practice measures would be incorporated into the detailed Soil Resource Management Plan secured through the Operational Environmental Management Plan (OEMP) [APP-422], including measures to avoid damage to soils and to reinstate affected areas following maintenance activities. Regarding potential contamination, ES Chapter 11 Land quality and ground conditions [APP-090] identifies that any migration and discharge of contamination into groundwater or surface water could potentially affect ecological and land-use receptors; however, with the implementation of the embedded mitigation and operational controls, the magnitude of impact is reduced to negligible and the residual effect on controlled waters is assessed as minor adverse and not significant. Relevant measures included in the

Reference	Theme	Issue raised	The Applicant's response
			Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), include the development of a plan for dealing with unforeseen contamination, including a watching brief and discovery strategy during groundworks and the appropriate storage of contaminated soils, e.g. placement on impermeable surfaces. In addition, the OEMP [APP-422] includes a requirement for the preparation and implementation of a Pollution Management Plan (OEMP8), which will include measures to avoid pollution incidents, response procedures and escalation protocols in the event of an operational failure. The OEMP [APP-422] also requires an Emergency Response Plan to be implemented, including procedures for uncontrolled discharge events, pollution incidents and environmental containment measures. These measures are intended to manage the risk of impacts on adjoining ditches, watercourses and surrounding agricultural land arising from operational failures or accidental releases.
RR-258-86	Location of AGP	Land plots 11-019 Impacts of DCO: during operation The position of the pumping station may also affect shooting practice and the ability to use surrounding land for drives.	The Scheme Development Report [APP-075 – 3 documents] sets out the process that was undertaken to select the AGP sites. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions. Please also refer to the Applicant's the Applicant's response to RR-258-121.
RR-258-87	Landowner engagement	Drawing reference (Examination Library number APP-010) Land Plan number Land plots 11-020 Impacts of DCO: now As above	Please refer to the Applicant's response to RR-258-44.
RR-258-88	Landowner engagement	Land plots 11-020 Impacts of DCO: during construction As above	Please refer to the Applicant's the Applicant's response to RR-258-45.
RR-258-89	Location of AGP	Land plots 11-020	Please refer to the Applicant's response to RR-258-46.

Reference	Theme	Issue raised	The Applicant's response
		Impacts of DCO: during operation As above	
RR-258-90	Landowner engagement	3 Drawing reference (Examination Library number APP-010) 23008223_PLN_LAND_12 Land Plan number Sheet 12 of 30 Land plots 11-013 (also on Sheet 11 of 30) Impacts of DCO: now As above	Please refer to the Applicant's response to RR-258-44.
RR-258-91	Landowner engagement	Land plots 11-013 Impacts of DCO: during construction As above	Please refer to the Applicant's response to RR-258-82.
RR-258-92	Location of AGP	Land plots 11-013 Impacts of DCO: during operation As above	Please refer to the Applicant's response to RR-258-46.
RR-258-93	Land use and agriculture	Drawing reference (Examination Library number APP-010) Land Plan number Land plots 11-014 (also on Sheet 11 of 30)	The Applicant acknowledges this comment. Environmental Statement (ES) Chapter 12 Land Use and Agriculture [APP-091] identifies that businesses at Albany Business Centre could experience temporary impacts on access associated with road closures on Chalk Lane during construction. Access to businesses would be maintained at all times and a Framework Construction Traffic Management Plan [APP-415] includes measures to reduce construction traffic impacts and the potential for disruption to access. The assessment concludes that temporary effects associated with access and construction traffic would be minor adverse and not significant. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of the Project, in accordance with the

Reference	Theme	Issue raised	The Applicant's response
		Impacts of DCO: now Close proximity to Albany Business Centre will cause problems to the tenant and results in difficulty in rent review conversations.	Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-258-94	Landowner engagement	Land plots 11-014 Impacts of DCO: now There is disturbance to the Estate for the need of various surveys which require access to be arranged.	Please refer to the Applicant's response to RR-258-80 regarding the Applicant's approach to survey access.
RR-258-95	Landowner engagement	Land plots 11-014 Impacts of DCO: during construction The proposed works could result in a loss of rental income to the Estate, as it may be necessary to agree reduced rents or rent-free periods to reflect the significant disturbance arising from the construction of the pumping station.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-258-96	Land use and agriculture	Land plots 11-014 Impacts of DCO: during construction This will particularly cause disturbance to Albany Farmhouse who is currently let as a care home for disabled adults who need fulltime care.	The Applicant acknowledges this comment. Albany Farm Care Home has been assessed within ES Chapter 12 Land Use and Agriculture [APP-091] as a high-sensitivity receptor due to the nature of its occupants. The assessment notes that access to the care home would be maintained at all times and that construction traffic associated with IPS-F would use a new access route and would not pass in proximity to the care home. The assessment concludes that the magnitude of impact would be negligible, resulting in a minor adverse effect which is not significant. Potential effects on sensitive and vulnerable receptors are also considered within ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1)
RR-258-97	Land use and agriculture	Land plots 11-014 Impacts of DCO: during construction Such disturbance is expected to include noise, dust, increased traffic movements, the construction of the pumping station, and the use of the Albany Business Centre access route.	The Applicant acknowledges this comment. Potential effects associated with construction activities, including noise, dust, construction traffic, temporary impacts on access and the construction of IPS-F, have been assessed in ES Chapter 12 Land use and agriculture [APP-091] and the relevant technical assessments including ES Chapter 15 Noise and vibration [APP-094], ES Chapter 6 Air Quality and odour (Document reference 6.1, DCO Volume 6, Version 1), and ES Chapter 18 Traffic and transport [APP-097]. The assessment in ES Chapter 12 Land use and agriculture [APP-091], drawing on the findings of ES Chapter 18 Traffic and transport [APP-097] identifies Albany Business Centre as a business receptor that could

Reference	Theme	Issue raised	The Applicant's response
			experience temporary impacts on access associated with works on Chalk Lane. However, access to businesses would be maintained at all times and a Framework Construction Traffic Management Plan (CTMP) [APP-415] includes measures to reduce construction traffic impacts and the potential for disruption to access. Where road closures are proposed, a sequential approach would be adopted to reduce impacts on journey times and minimise disruption for road users. No construction vehicles would be permitted to use the Albany Business Centre access, with a temporary direct access proposed with Chalk Lane, as detailed in the Framework CTMP. Commitments secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) include maintaining access to landowners and occupiers where reasonably practicable and ongoing engagement with affected landowners and businesses throughout the construction period.
RR-258-98	Land use and agriculture	Land plots 11-014 Impacts of DCO: during construction The works are also likely to disrupt agricultural operations, potentially affecting crop production and resulting in reduced harvest yields and associated financial losses. The proposal would constrain access to the affected land and to adjoining land parcels that are accessed via the Albany Business Centre access track. The use of this access route for construction purposes may restrict or impede the Estate's ability to access and manage these areas effectively, leading to further operational and agricultural impacts.	The Applicant acknowledges this comment regarding the potential effects of construction activities on agricultural operations and access to land. ES Chapter 12 Land use and agriculture [APP-091] considers the effects of temporary and permanent loss of agricultural land, disruption to agricultural operations, temporary loss of access and severance of agricultural fields. Engagement with landowners has been undertaken to understand the extent and nature of landholdings and agricultural operations. Commitments secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) include maintaining access to farm tracks and providing private farm access across the open-cut pipeline during construction, where practicable, to reduce field severance. Stiles, gates or gaps will be incorporated into temporary fencing where reasonably practicable to maintain access for landowners and occupiers, and additional access points may be provided by agreement with the landowner or occupier. ES Chapter 12 Land use and agriculture [APP-091], informed by ES Chapter 18 Traffic and transport [APP-097] identifies Albany Business Centre as a business receptor which could experience temporary impacts associated with road or lane closures on Chalk Lane. Access to businesses would be maintained throughout construction and, where road closures are proposed, a sequential approach would be adopted to reduce impacts on journey times and minimise disruption. The Framework Construction Traffic Management Plan (CTMP) [APP-415] includes measures to manage construction traffic and reduce disruption, where reasonably practicable.
RR-258-99	Location of AGP	Land plots 11-014 Impacts of DCO: during operation Permanent rent reduction, limited on completing rent reviews/there may be a cap on rents on commercial rents or a difficulty to find tenants to let commercial tenants due to the close proximity of the pumping station which	Please refer to the Applicant's response to RR-258-66

Reference	Theme	Issue raised	The Applicant's response
		could cause noise and visual disturbance. Especially as Albany Farmhouse (adjoining land owned by the Southwick Estate in separate but connected ownership) who is currently let as a care home for disabled adults who need fulltime care.	
RR-258-100	Location of AGP	Land plots 11-014 Impacts of DCO: during operation The field where the pumping station is situated will also sever part of the field which will no longer be suitable for agricultural production which therefore causes a further loss for the Estate.	Please refer to the Applicant's response to RR-258-62 with respect to the impacts from the operation of IPS-F on plot 11-014. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions.
RR-258-101	Landscape and visual	Land plots 11-014 Impacts of DCO: during operation The pumping station location will also have a visual impact on the residential development as well as causing severe noise pollution. This could severely affect sales of the residential properties which are being developed.	Please refer to the Applicant's response to RR-258-68
RR-258-102	Location of AGP	Land plots 11-014 Impacts of DCO: during operation The pumping station may result in long-term impacts on surrounding agricultural land through soil compaction, erosion, altered drainage, and potential contamination, which could reduce soil quality.	The assessment presented in the ES [APP-080 to APP-411] does not identify any likely significant effects on soil compaction, erosion, altered drainage or potential contamination resulting in reduced soil quality from the presence of the pumping station (IPS-F).
RR-258-103	Land use and agriculture	Drawing reference (Examination Library number APP-010) Land Plan number Land plots 11-015 (also on Sheet 11 of 30) Impacts of DCO: now As above	The Applicant acknowledges concerns regarding the potential effects of the Project on access arrangements and the management of land associated with Plot 11-015. ES Chapter 12 Land use and agriculture [APP-091] assessed the likely significant effects of the Project on agricultural land use, including impacts on farm operations, access arrangements, field severance and the operational capacity of farm holdings. The assessment concluded that, given the short-term and temporary nature of the construction works and the embedded mitigation secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3), significant effects on the ongoing viability or operational capacity of farm holdings are not anticipated. Commitments secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) include maintaining access to farm tracks where reasonably practicable, provision of private farm access across the working corridor where feasible, incorporation of gates, gaps or stiles within temporary fencing where reasonably practicable, and ongoing engagement with affected landowners and occupiers.

Reference	Theme	Issue raised	The Applicant's response
			The Applicant notes the concern regarding potential damage to the access track arising from construction traffic and plant movements. Construction traffic and access arrangements are managed through the Framework CTMP [APP-415], which includes measures to manage construction traffic and minimise disruption to landowners and occupiers. Access arrangements would continue to be discussed with affected landowners as detailed design and construction planning progresses. Following completion of the works, temporarily affected land would be reinstated in accordance with the Outline Soil Resource Management Plan contained within Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and the assessment concludes that agricultural use can continue following reinstatement.
RR-258-104	Traffic and transport	Land plots 11-015 Impacts of DCO: during construction In addition to the reasons set out above, there are particular concerns regarding access to this land and the potential restriction of access to other areas that are reached via this estate. There is also significant concern that the access track may be damaged as a result of the substantial volume of HGV traffic and heavy machinery that would be required during the works. The track was not designed or constructed to accommodate such intensive use, and there is a real risk of deterioration, damage, and disruption to those who rely on it for access.	The applicant acknowledges the concerns of the Respondent with regards to the access track may be damaged as a result of the substantial volume of Heavy Goods Vehicles (HGV) traffic and heavy machinery that would be required during the works. It can be confirmed that the use of the access track would only be for operational purposes. As detailed in the Framework Construction Traffic Management Plan (CTMP) [APP-415], a separate access is proposed for construction which would be taken directly from Chalk Lane.
RR-258-105	Location of AGP	Land plots 11-015 Impacts of DCO: during operation As above but particular concern with the access route, causing problems with limiting access via this route.	The development of IPS-F (Work No. 5A) would not restrict the use of this existing access track during the operation phase. The IPS-F design principles plan in the Design Principles Document [APP-076] shows that IPS-F infrastructure would not be located on the existing access track. Environmental works are proposed to the south east of the access track, and design principle IPS-F_10 in the Design Principles Document [APP-076] sets out that planting will be design to allow continued use of the access track.
RR-258-106	Land use and agriculture	Drawing reference (Examination Library number APP-010) Land Plan number Land plots 11-019 (also on Sheet 11 of 30) Impacts of DCO: now	The Applicant acknowledges this comment. Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091] identifies that businesses at Albany Business Centre could experience temporary impacts on access associated with road closures on Chalk Lane during construction. The assessment considered the potential for temporary impacts on access associated with construction activities and concluded that, with the implementation of embedded mitigation measures, effects on businesses would be minor adverse and not significant. Access to businesses would be maintained throughout the construction period. The Framework Construction Traffic Management Plan [APP-415] includes measures to manage construction traffic and minimise disruption to access,

Reference	Theme	Issue raised	The Applicant's response
		Close proximity to Albany Business Centre will cause problems to the tenant and results in difficulty in rent review conversations.	including the use of sequential road closures where required to reduce impacts on journey times and business operations. The Applicant will continue to engage with affected landowners, occupiers and businesses throughout detailed design and construction planning. Where business operations, land use activities or other functions linked to affected land or structures are impacted, compensation would be considered in accordance with the relevant provisions of the Development Consent Order and the statutory Compensation Code.
RR-258-107	Landowner engagement	Land plots 11-019 Impacts of DCO: now There is disturbance to the Estate for the need of various surveys which require access to be arranged.	Please refer to the Applicant's response to RR-258-80 regarding the Applicant's approach to survey access.
RR-258-108	Land use and agriculture	Land plots 11-019 Impacts of DCO: during construction This will particularly cause disturbance to Albany Farmhouse who is currently let as a care home for disabled adults who need fulltime care. Such disturbance is expected to include noise, dust, increased traffic movements, the construction of the pumping station, and the use of the Albany Business Centre access route. The works are also likely to disrupt agricultural operations, potentially affecting crop production and resulting in reduced harvest yields and associated financial losses. The proposal would constrain access to the affected land and to adjoining land parcels that are accessed via the Albany Business Centre access track. The use of this access route for construction purposes may restrict or impede the Estate's ability to access and manage these areas effectively, leading to further operational and agricultural impacts.	The Applicant acknowledges this comment. Albany Farm Care Home has been assessed within ES Chapter 12 Land use and agriculture [APP-091] as a high-sensitivity receptor due to the nature of its occupants. The assessment notes that access to the care home would be maintained at all times and that construction traffic associated with IPS-F would use a new access route and would not pass in proximity to the care home. The assessment concludes that the magnitude of impact would be negligible, resulting in a minor adverse effect which is not significant. Potential effects associated with construction activities, including noise, dust and traffic, are also assessed within the relevant environmental assessments and appropriate mitigation measures are secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3).
RR-258-109	Location of AGP	Land plots 11-019 Impacts of DCO: during operation Permanent rent reduction, limited on completing rent reviews/there may be a cap on rents on commercial rents or a difficulty to find tenants to let commercial tenants due to the close proximity of the pumping station which could cause noise and visual disturbance. Especially as Albany Farmhouse (adjoining land owned by the Southwick Estate in separate but connected ownership) who is currently let as a care home for disabled adults who need fulltime care.	Please refer to the Applicant's response to RR-258-66.

Reference	Theme	Issue raised	The Applicant's response
RR-258-110	Land use and agriculture	Land plots 11-019 Impacts of DCO: during operation The field where the pumping station is situated will also sever part of the field which will no longer be suitable for agricultural production which therefore causes a further loss for the Estate.	The Applicant notes this comment. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions. Land Plot 11-019 is required for IPS-F (Work No. 5A). ES Chapter 12 Land use and agriculture [APP-091] confirms that the land affected is classified as Subgrade 3b quality. ES Chapter 12 Land use and agriculture [APP-091] confirms that the loss to agriculture and therefore to crop production and harvest yields will be permanent and irreversible, but concludes that this loss represents a minor adverse effect on agricultural land and is not significant.
RR-258-111	Landscape and visual	Land plots 11-019 Impacts of DCO: during operation The pumping station location will also have a visual impact on the residential development as well as causing severe noise pollution. This could severely affect sales of the residential properties which are being developed.	Please refer to the Applicant's response to RR-258-68
RR-258-112	Land use and agriculture	Land plots 11-019 Impacts of DCO: during operation The pumping station may result in long-term impacts on surrounding agricultural land through soil compaction, erosion, altered drainage, and potential contamination, which could reduce soil quality.	Refer to response to RR-258-69. The Applicant acknowledges the concern regarding the potential for soil quality to be affected through compaction, erosion, altered drainage and potential contamination. Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091] scoped operational effects on soils out of full assessment on the basis that significant effects on soils during operation are unlikely as there will be no further disturbance to the soil resource once construction is complete. The Outline Soil Resource Management Plan (SRMP), as contained in Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), includes measures for the handling, storage and reinstatement of soils during construction to minimise compaction and maintain soil function following reinstatement. The assessment concludes that soils can continue to perform the same functions as before construction where these measures are implemented. Should maintenance or repair works be required during operation that result in disturbance to soils, good practice measures would be incorporated into the detailed Soil Resource Management Plan (SRMP) secured through the Operational Environmental Management Plan (OEMP) [APP-422]. These measures include avoiding access when soils are particularly susceptible to damage and reinstating affected areas following maintenance activities Measures to manage drainage, pollution prevention and environmental protection are secured through the relevant management plans for the Project. The Applicant therefore does not anticipate significant operational effects on surrounding agricultural land arising from soil disturbance

Reference	Theme	Issue raised	The Applicant's response
RR-258-113	Land use and agriculture	Drawing reference (Examination Library number APP-010) Land Plan number Land plots 11-020 (also on Sheet 11 of 30) Impacts of DCO: now As above	Please refer to the Applicant's response to RR-258-44.
RR-258-114	Land use and agriculture	Land plots 11-020 Impacts of DCO: during construction As above	The Applicant acknowledges concerns regarding potential effects on Albany Business Centre, Albany Farm Care Home and the wider estate holding. As stated in Environmental Statement (ES) Chapter 12 Land Use and Agriculture [APP-091] IPS-F is to be located on land approximately 290m east of Albany Farm Care Home. Access to the construction compound for IPS-F is to be via a new means of access, to be constructed within the Order Limits, north of Albany Farm Business Park. At its nearest point, the new access track would be approximately 135m from the care home. Access will therefore be maintained at all times, and no construction traffic would pass in proximity to Albany Farm Care Home. The resulting effect is assessed as minor adverse and not significant. Similarly, regarding the Business Centre access would be maintained at all times, and the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) secures ongoing engagement with affected landowners, occupiers and operators throughout the construction period.
RR-258-115	Location of AGP	Land plots 11-020 Impacts of DCO: during operation As above	The Applicant notes this comment. Please refer to the Applicant's responses provided earlier in the document, particularly RR-258-66, RR-258-68, RR-258-85 and RR-258-86.
RR-258-116	Land use and agriculture	Drawing reference (Examination Library number APP-010) Land Plan number Land plots 11-023	The Applicant acknowledges the concerns raised regarding potential effects on Albany Business Centre and Albany Farm Care Home, both of which have been identified and assessed as receptors within the ES Chapter 12 Land use and agriculture [APP-091]. In relation to Albany Farm Care Home, the Environmental Statement identifies that access to the care home would be maintained at all times and that no construction traffic would pass in proximity to the care home. The assessment concludes that the magnitude of the impact is considered to be negligible.

Reference	Theme	Issue raised	The Applicant's response
		Impacts of DCO: now As above	The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) includes commitments to maintain access for landowners and occupiers where reasonably practicable and to proactively engage with affected owners and operators throughout the duration of the works. If during engagement it is determined that business operations, agricultural business operations, land use activities or any other functions linked to the affected land or structures will be affected or interrupted, then compensation is payable in accordance with the relevant provisions of the DCO and the statutory compensation code.
RR-258-117	Land use and agriculture	Land plots 11-023 Impacts of DCO: during construction As above	Please refer to the Applicant's response to RR-258-82.
RR-258-118	Location of AGP	Land plots 11-023 Impacts of DCO: during operation As above	The Applicant notes this comment. Please refer to the Applicant's responses provided earlier in the document, particularly RR-258-66, RR-258-68, RR-258-85 and RR-258-86.
RR-258-119	Landowner engagement	Drawing reference (Examination Library number APP-010) Land Plan number Land plots 12-010 Impacts of DCO: now Creates uncertainty for the future management making it more difficult to plan farming operations and future development (such as establishing utility routes). They would also disrupt the shooting enterprise, including the establishment and management of game cover crops.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. The Applicant is engaging with the developers of Welborne Garden Village to discuss potential interfaces with utilities and infrastructure. Further information was recently sent to the developer's project manager on the 18 of September to progress discussions regarding the infrastructure and utilities network being constructed. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions.
RR-258-120	Land use and agriculture	Land plots 12-010 Impacts of DCO: during construction The proposed works would affect a key farm track, disrupting access to fields on either side and to land beyond, which would adversely affect farming operations.	The Applicant acknowledges this comment. ES Chapter 12 Land use and agriculture [APP-091] considers temporary impacts on agricultural land use, including loss of access, disruption to agricultural operations and severance of agricultural fields. Commitments secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) include the maintenance of access to farm tracks and the provision of private farm access across the open-cut pipeline during construction, as required and where feasible, to

Reference	Theme	Issue raised	The Applicant's response
			mitigate field severance. Stiles, gates or gaps will be incorporated into temporary fencing where reasonably practicable to maintain access for landowners and occupiers, and additional access points may be provided by agreement with the landowner or occupier. Given the short-term and temporary nature of the pipeline installation, it is not anticipated that there would be any likely significant effects arising from ongoing farm viability issues that cannot be resolved through the measures contained within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) including ongoing discussion and negotiation.
RR-258-121	Land use and agriculture	Land plots 12-010 Impacts of DCO: during construction The proximity of the works to adjoining woodland may also disturb bird habitat, with consequent impacts on the shooting enterprise. Collectively, these effects would significantly disrupt established farming practices and sporting activities.	The Applicant notes the concern regarding potential disturbance to bird habitat in adjacent woodland and the potential consequential effects on farming diversification activities, including shooting interests. Environmental Statement (ES) Chapter 12 Land Use and Agriculture [APP-091] considers the likely significant effects of the Project on agricultural land holdings, existing agricultural activities and land use receptors, including the temporary and permanent use of land required for the Project and effects on the operation of affected agricultural holdings. The assessment concluded that, following implementation of mitigation measures, significant effects on agricultural land holdings would not arise. These measures are set out in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and include the preparation and implementation of a detailed Soil Resource Management Plan (SRMP) to protect soil resources, the provision of stiles, gates or gaps within temporary fencing where reasonably practicable to maintain landowner and occupier access, and the provision of additional access points by agreement with landowners and occupiers where reasonably practicable to reduce field severance. The contractor will also continue to engage with affected landowners and occupiers throughout construction to minimise disruption to business operations and land use activities. Where business operations, including agricultural activities, are affected, compensation would be payable in accordance with the relevant provisions of the DCO and the statutory compensation code on a case-by-case basis. Potential effects on habitats and species, including effects on habitats used by released game birds for cover and foraging, are assessed within ES Chapter 8 Terrestrial and freshwater biodiversity [Document reference 6.1, DCO Volume 6, Version 1]. The assessment concludes that effects on wild birds would be minor adverse and not significant, following implementation of primary and tertiary mitigation. This is because potential effects from habitat loss and degradation, habitat fragmentation, disturbance, and killing or injury would be addressed through the proposed mitigation measures. Appropriate mitigation measures are identified where required and are secured through the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), [APP-413] and

Reference	Theme	Issue raised	The Applicant's response
			[APP-414] for documents 2 and 3), the Outline Landscape and Ecology Management Plan (LEMP) [Document reference 7.5, DCO Volume 7, Version 1], the Invasive Non-Native Species (INNS) Biosecurity Plan [APP-425] , the Biodiversity Gain Plan [APP-426] and the relevant requirements of the draft DCO [APP-023]. The Applicant has therefore assessed the likely significant environmental effects of the Project on the relevant environmental receptors and considers that an appropriate framework of mitigation and control measures is in place.
RR-258-122	Landowner engagement	Land plots 12-010 Impacts of DCO: during operation Permanent access rights for Southern Water across the land and farm track would cause ongoing disruption to farming operations and the shooting enterprise, adversely affecting land management, operational efficiency, and sporting activities. The easement may also constrain or delay the provision of future utilities required to serve the Welborne Development, thereby prejudicing the delivery of strategic infrastructure.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. Where access is required in the future for routine maintenance or repair, the Applicant will give reasonable notice of the intention to carry out the works. This notice period will normally be at least 7 days, unless a shorter period is agreed or it is an emergency. The Applicant is engaging with the developers of Welborne Garden Village to discuss potential interfaces with utilities and infrastructure. Further information was recently sent to the developer's project manager on the 18 September 2026 to progress discussions regarding the infrastructure and utilities network being constructed.
RR-258-123	Landowner engagement	Drawing reference (Examination Library number APP-010) Land Plan number Land plots 12-011 Impacts of DCO: now As above	Please refer to the Applicant's response to RR-258-119 regarding the Applicant's response to the impacts of the DCO now.
RR-258-124	Land use and agriculture	Land plots 12-011 Impacts of DCO: during construction	The Applicant notes the concerns raised regarding potential effects on agricultural land, farming operations and estate activities. During construction, temporary disruption to agricultural activities may occur where land is required for the installation of the pipeline and associated works. Measures to minimise

Reference	Theme	Issue raised	The Applicant's response
		As above	and manage effects on soils and agricultural land are set out within the Outline Soil Resource Management Plan (SRMP), contained in Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). The Outline SRMP includes measures relating to soil stripping, storage, handling, reinstatement and drainage management to maintain agricultural land quality and capability following construction. Following completion of construction, land temporarily required for the works will be reinstated in accordance with the detailed SRMP and returned to its previous use wherever practicable. The Applicant therefore expects agricultural activities to be able to resume following reinstatement. Compensation for any effects arising from the acquisition of land or rights will be addressed through the statutory compensation process. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions.
RR-258-125	Landowner engagement	Land plots 12-011 Impacts of DCO: during operation As above	Please refer to the Applicant's response to RR-258-122 regarding the Applicant's response to the impacts of the DCO during operation.
RR-258-126	Landowner engagement	Drawing reference (Examination Library number APP-010) Land Plan number Land plots 12-012 Impacts of DCO: now Creates uncertainty for the future management, making it more difficult to plan farming operations and future development (such as establishing utility routes). They would also disrupt the shooting enterprise, including the establishment and management of game cover crops.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. The Applicant is engaging with the developers of Welborne Garden Village to discuss potential interfaces with utilities and infrastructure. Further information was recently sent to the developer's project manager on the 18 September 2026 to progress discussions regarding the infrastructure and utilities network being constructed. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions.
RR-258-127	Location of the proposed pipeline	Land plots 12-012 Impacts of DCO: now Land in this Plot has been earmarked to satisfy BNG obligations as part of ancillary planning applications for the development of the adjoining development (the Welborne Garden Village). Particular concerning is the wide blue corridor proposed for this and other adjoining Plots on the Roche Court	The Applicant is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. The Applicant is engaging with the developers of Welborne Garden Village to discuss potential interfaces with utilities and infrastructure. Further information was recently sent to the developer's project manager on

Reference	Theme	Issue raised	The Applicant's response
		Estate which create uncertainty preventing plans to use these areas as originally intended. In particular, new electricity cables are required to run to the new electricity substation and land to the south of Carpenters Copse within this Plot was earmarked to satisfy BNG Obligations arising from planning applications for this new electricity apparatus.	the 18 September 2026 to progress discussions regarding the infrastructure and utilities network being constructed. The Applicant is also engaging with the developers of Welborne Garden Village to discuss BNG interfaces. Given that plot 12-012's proposed use by the Applicant is to be Environmental Mitigation and not BNG, the Applicant therefore considers that the proposal is not necessarily incompatible with the respondent's own proposals for the Estate and that there is potential for the respective Environmental Mitigation and BNG proposals to co-exist and, where practicable, be aligned. The Applicant is engaging with the respondent's land agent regarding the environmental mitigation proposals, with bespoke Heads of Terms issued to the respondent's land agent on the 4 September 2026. Discussions are ongoing regarding the proposals, most recently in a meeting with the respondent on 10 November 2026 where progress was made.
RR-258-128	Land use and agriculture	Land plots 12-012 Impacts of DCO: during construction Will affect farming practices, damage cover crops and affect the shoots practice. This may limit drives the number of drives which can be undertaken. Equally, it is in close proximity to Carpenters Copse which will again affect the Estate's shoot.	Refer to response to RR-258-121.
RR-258-129	Landowner engagement	Land plots 12-012 Impacts of DCO: during operation The proposed environmental mitigation planting would result in the permanent loss of arable land and impede access to adjoining fields, adversely affecting the operation and management of the Estate. The planting may also constrain the provision of future utility infrastructure required to serve the Welborne Development, thereby limiting the land's strategic potential. In addition, the loss of usable land and changes to land management would adversely affect the shooting enterprise, and potentially damaging its reputation.	The Applicant notes the respondent's concerns regarding the operational effects of the proposed environmental mitigation within plot 12-012. The rights sought over this plot are required for environmental mitigation associated with EMEA-F-2, as set out in the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). In relation to the permanent loss of arable land, the Applicant notes that the respondent is itself proposing biodiversity net gain (BNG) measures in connection with the Welborne Garden Village development within plot 12-012 which may result in changes to the existing agricultural use of the land. The Applicant therefore considers that the principle of a change from arable use is not necessarily incompatible with the respondent's own proposals for the Estate and that there is potential for the respective environmental mitigation and BNG proposals to co-exist and, where practicable, be aligned. The Applicant is engaging with the land agents for the respondent regarding the environmental mitigation proposals, with bespoke Heads of Terms issued to the respondent's land agent on the 4 September 2026. Discussions remain ongoing, most recently in a meeting with the respondent on 10 November 2026.
RR-258-130	Location of the proposed pipeline	Land plots 12-012 Impacts of DCO: during operation	Please see the Applicant's response to RR-258-127.

Reference	Theme	Issue raised	The Applicant's response
		Land already used to satisfy BNG obligations for the DCO cannot be used for the Welborne Garden Village BNG Obligations as initially planned. It is unclear what changes to proposed works to the electricity apparatus will be required (as this will depend on the precise location of the operation once it has been installed). Again, this is hampered by the large corridor (in terms of width) identified for the DCO, when a smaller width would give landowners more certainty and allow for better planning.	
RR-258-131	Landowner engagement	Drawing reference (Examination Library number APP-010) Land Plan number Land plots 12-013 Impacts of DCO: now Creates uncertainty for the future management making it more difficult to plan farming operations and future development (including establishing utility routes). They would also disrupt the shooting enterprise, including the establishment and management of game cover crops.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. The Applicant is engaging with the developers of Welborne Garden Village to discuss potential interfaces with utilities and infrastructure. Further information was recently sent to the developer's project manager on the 18 September 2026 to progress discussions regarding the infrastructure and utilities network being constructed. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP [APP-412, Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3] and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions.
RR-258-132	Landowner engagement	Land plots 12-013 Impacts of DCO: during construction There will be significant disruption established farming practices and sporting activities.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. The Applicant confirms that protection for access, drainage and soils included within the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and the Outline Soil Resource Management Plan at Appendix B therein. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-258-133	Landowner engagement	Land plots 12-013 Impacts of DCO: during operation	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable.

Reference	Theme	Issue raised	The Applicant's response
		There will be ongoing disruption to farming operations and the shooting enterprise, adversely affecting land management, operational efficiency, and sporting activities.	Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. Where access is required in the future for routine maintenance or repair, the Applicant will give reasonable notice of the intention to carry out the works. This notice period will normally be at least 7 days, unless a shorter period is agreed or it is an emergency. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of required access, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-258-134	Landowner engagement	Land plots 12-013 Impacts of DCO: during operation The easement may also constrain or delay the provision of future utilities required to serve the Welborne Development, thereby prejudicing the delivery of strategic infrastructure.	The Applicant is engaging with the developers of Welborne Garden Village to discuss potential interfaces with utilities and infrastructure. Further information was recently sent to the developer's project manager on the 18 September 2026 to progress discussions regarding the infrastructure and utilities network being constructed.
RR-258-135	Landowner engagement	Land plots 12-013 Impacts of DCO: during operation It also has significant development potential, which would be sterilised or materially constrained by the presence of the pipeline and associated easement rights, thereby reducing the Estate's ability to bring the land forward for future development and diminishing its overall value.	The Applicant notes that plot 12-013 is included within the Welborne Garden Village application as part of the utilities corridor and local road network. As the respondent already has proposals for this land and no planning application has been made at this site for further development, it would not be reasonable for the design of the Project to be implicated when there is no certainty that further development will come forward in this location. The Applicant is engaging with the developers of Welborne Garden Village to discuss potential interfaces with utilities and infrastructure. Further information was recently sent to the developer's project manager on the 18 September 2026 to progress discussions regarding the infrastructure and utilities network being constructed.
RR-258-136	Landowner engagement	Drawing reference (Examination Library number APP-010) Land Plan number Land plots 12-014 Impacts of DCO: now	Please refer to the Applicant's response to RR-258-131 regarding the Applicant's response to the impacts of the DCO now.

Reference	Theme	Issue raised	The Applicant's response
		As above	
RR-258-137	Landowner engagement	Land plots 12-014 Impacts of DCO: during construction As above	Please refer to the Applicant's response to RR-258-132 regarding the Applicant's response to the impacts of the DCO during construction.
RR-258-138	Landowner engagement	Land plots 12-014 Impacts of DCO: during operation As above	Please refer to the Applicant's response to RR-258-133 regarding the Applicant's response to the impacts of the DCO during operation.
RR-258-139	Landowner engagement	Drawing reference (Examination Library number APP-010) Land Plan number Land plots 12-015 Impacts of DCO: now Surveys etc could cause disturbance to agricultural practice. Impact on Shoot as at 12-012	Please refer to the Applicant's response to RR-258-126 regarding the Applicant's response to the impacts of the DCO now. Please refer to the Applicant's response to RR-258-80 regarding the Applicant's approach to survey access.
RR-258-140	Land use and agriculture	Land plots 12-015 Impacts of DCO: during construction Road closures will cause inconvenience and disturbance to the shoot and farming	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers. ES Chapter 18 Traffic and transport [APP-097] assesses temporary road closures and concludes that, with the implementation of the Traffic Management Strategy (TMS) [APP-416] and Framework CTMP [APP-415], impacts on access and journey times would be managed through measures including maintaining alternative routes, adopting a sequential approach to nearby road closures, and avoiding temporary road closures on roads used for regional or national journeys where reasonably practicable. The Applicant acknowledges that, during construction of the Project, existing land uses, including shooting and farming activities, may be temporarily affected. The Applicant recognises that shooting activities may form part of a wider land management, recreational or commercial operation and that temporary disruption may affect how and when those activities are undertaken. However, these effects would be temporary and the Applicant will continue to engage with affected landowners and occupiers regarding construction timing, sequencing and access arrangements in order to minimise disruption where reasonably practicable. ES Chapter 12 Land use and agriculture [APP-091] confirms that mitigation measures secured through the Outline CEMP

Reference	Theme	Issue raised	The Applicant's response
			(Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) including the Outline Soil Resource Management Plan (Appendix B), provide for the protection of access, drainage and soils. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) also includes measures to maintain access where reasonably practicable and to engage with landowners and occupiers regarding timing, sequencing and access arrangements. The Applicant notes that affected parties may be entitled to compensation in accordance with the Compensation Code where the relevant statutory tests are met. Any claim would be considered on its individual merits and supported by appropriate evidence.
RR-258-141	Landowner engagement	Land plots 12-015 Impacts of DCO: during operation This could also cause issues to the shoot especially if there is any emergency or maintenance works which need to be carried out.	Please refer to the Applicant's response to RR-258-133 regarding the Applicant's response to the impacts of the DCO during operation.
RR-258-142	Landowner engagement	Drawing reference (Examination Library number APP-010) Land Plan number Land plots 12-016 Impacts of DCO: now As above	Please refer to the Applicant's response to RR-258-131 regarding the Applicant's response to the impacts of the DCO now.
RR-258-143	Land use and agriculture	Land plots12-016 Impacts of DCO: during construction As above	Please refer to the Applicant's response RR-258-132 regarding the Applicant's response to the impacts of the DCO during construction.
RR-258-144	Landowner engagement	Land plots 12-016 Impacts of DCO: during operation As above	Please refer to the Applicant's response to RR-258-133 regarding the Applicant's response to the impacts of the DCO during operation.
RR-258-145	Landowner engagement	4	Please refer to the Applicant's response to RR-258-131 regarding the Applicant's response to the impacts of the DCO now.

Reference	Theme	Issue raised	The Applicant's response
		Drawing reference (Examination Library number APP-010) 23008223_PLN_LAND_13 Land Plan number Sheet 13 of 30 Land plots 12-013 (also on Sheet 12 of 30) Impacts of DCO: now As above	
RR-258-146	Land use and agriculture	Land plots 12-013 Impacts of DCO: during construction As above	Please refer to the Applicant's response RR-258-132 regarding the Applicant's response to the impacts of the DCO during construction.
RR-258-147	Landowner engagement	Land plots 12-013 Impacts of DCO: during operation As above	Please refer to the Applicant's response to RR-258-133 regarding the Applicant's response to the impacts of the DCO during operation.
RR-258-148	Landowner engagement	Drawing reference (Examination Library number APP-010) Land Plan number Land plots 12-014 (also on Sheet 12 of 30) Impacts of DCO: now As above	Please refer to the Applicant's response to RR-258-131 regarding the Applicant's response to the impacts of the DCO now.
RR-258-149	Land use and agriculture	Land plots 12-014 Impacts of DCO: during construction	Please refer to the Applicant's response RR-258-132 regarding the Applicant's response to the impacts of the DCO during construction.

Reference	Theme	Issue raised	The Applicant's response
		As above	
RR-258-150	Landowner engagement	Land plots 12-014 Impacts of DCO: during operation As above	Please refer to the Applicant's response to RR-258-133 regarding the Applicant's response to the impacts of the DCO during operation.
RR-258-151	Landowner engagement	Drawing reference (Examination Library number APP-010) Land Plan number Land plots 12-016 (also on Sheet 12 of 30) Impacts of DCO: now As above	Please refer to the Applicant's response to RR-258-131 regarding the Applicant's response to the impacts of the Development Consent Order now.
RR-258-152	Land use and agriculture	Land plots 12-016 Impacts of DCO: during construction As above	Please refer to the Applicant's response RR-258-132 regarding the Applicant's response to the impacts of the DCO during construction.
RR-258-153	Landowner engagement	Land plots 12-016 Impacts of DCO: during operation As above [MAP] [MAP]	Please refer to the Applicant's response to RR-258-133 regarding the Applicant's response to the impacts of the DCO during operation.

Table 2-48 The Applicant's response to RR-259 from Registered Proprietors of Southwick Estate

Reference	Theme	Issue raised	The Applicant's response
RR-259-1	Landowner engagement	The proposed development will have unacceptable impacts on the operation of the Southwick Estate that have not been fully considered by the Applicant. Further details can be found in our representations to follow today.	The Applicant notes this comment, however as detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken extensive engagement with landowners and

Reference	Theme	Issue raised	The Applicant's response
			considered all feedback provided throughout statutory and non-statutory consultation. The Applicant's responses to each of the respondent's representations can be found below.
RR-259-2	Landowner engagement	1. Introduction 1.1 We act for Mr Mark Thistlethwayte and Mr Rupert Thistlethwayte, the registered proprietors of the Southwick Estate (our "Client"). 1.2 Our Clients are the freehold owners of the Southwick Estate, Fareham, Hampshire and registered at HM Land Registry under title number HP537554 (the "Southwick Estate"). An overview plan, together with four additional plans (Plans 1 – 4) showing extracts of the land within this title are attached at Annexure 1. The registered title plan for HP537554 is attached at Annexure 2. We ask the ExA to note that while much of the Southwick Estate is located to the east of North Boarhunt / Bere Farm, there are small elements located to the west near Welborne (Albany Farm, the Albany Farm Business Centre and the Albany Farmhouse). This is surrounded by the Welborne Development Site (more details in the RR submitted on behalf of Welborne Land Ltd). We also provide a copy of the registered title plan for the Southwick Estate, however, you will note that this is very cumbersome as HM Land Registry provide the plan split over 42 A4 pages and in practice this is very unwieldy to navigate with ease. There are other beneficial and partnership interests affecting the Southwick Estate – it is not thought the Examining Authority needs to be made aware of the detail but this can be disclosed if required.	The Applicant notes this comment.
RR-259-3	Landowner engagement	1.3 Approximately 38 Land Plots, as set out in the Book of Reference (APP-027), sit within the Southwick Estate. For those plots, our Client is therefore a category 1 person as set out in s. 57 Planning Act 2008. The precise plots are set out in the Schedule at Annexure 3 to this Relevant Representation (the 'Schedule'). Please note that the land plots identified are based on a review of the various Land Plans against the registered title plan to the Southwick Estate. As such, it is possible that there may be discrepancies as we have not carried out any Land Registry SIM searches to verify the position. It is therefore possible that additional land plots may be identified as part of our more detailed review of the Application.	The Applicant notes this comment. The Applicant has since had further engagement with the respondent's land agent throughout September 2026 regarding their land interests and is now undertaking a review of their interests within the Order Limits. The Applicant is in the process of checking and verifying the information with the respondent and will update the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1) accordingly with any necessary amendments.
RR-259-4	Landowner engagement	1.4 The Southwick Estate adjoins and is connected with, but is in separate ownership to, additional land also affected by the DCO. In particular, the parcels owned by Welborne Land Limited and the Roche Court Estate (which is in separate but connected ownership). Our Client anticipates they will be impacted by works carried out on land adjoining or near to the Southwick Estate. For example, the precise routes of services or other easements serving the Southwick Estate will not always be documented on the registered titles (or known to our Client) and the Southwick Estate is likely to be impacted in the long term by the proposed use of land Plots 11-022, 11-019, 11-015 and 11-	The Applicant notes this comment. Please refer to the Applicant's response to RR-259-3.

Reference	Theme	Issue raised	The Applicant's response
		014 (which is in separate legal ownership). Further details will be provided in due course.	
RR-259-5	Landowner engagement	1.5 Our Client will also be classified as Category 2, Category 3 and Part 3 persons in respect of land plot numbers neighbouring the Southwick Estate.	The Applicant notes this comment.
RR-259-6	Landowner engagement	1.6 These representations focus on identifying the impact where our Client is a Category 1 Person.	The Applicant notes this comment.
RR-259-7	Principle of development	1.7 Our Client objects to the application, for the reasons set out below.	The Applicant notes this comment.
RR-259-8	Landowner engagement	2. Book of Reference inaccuracies 2.1 The plots of land that Our Client has an interest in is shown on Land Plans numbers 6 to 10 (inclusive) of 30 and 12 of 30, as set out in APP-010.	The Applicant has undertaken diligent inquiry to obtain the details of persons with an interest in the Order Limits, as summarised in the Consultation Report [APP-029] section 9.3.17 to 9.3.30. As part of this process Land Interest Questionnaires (LIQs) were issued to the respondent ahead of the Summer 2024 Consultation to assist the respondent in identifying themselves, confirming contact details, and clarifying land ownership, occupation, tenancy arrangements, and any other interests in land, including rights of way and option agreements. The LIQs also sought to confirm that land ownership and occupation boundaries were correctly identified. The Applicant did not receive a response to these LIQs from the respondent despite reminder letters being sent. The Applicant then issued the respondent a Confirmation Schedule in October 2025, which summarised the Applicant's understanding of the respondent's interest in land relevant to the Project. The Applicant sought a response to confirm whether the information held was correct, however no response was provided despite a further reminder letter being issued in December 2025. The Applicant has since had further engagement with the respondent's land agent throughout September 2026 regarding their land interests and is now undertaking a review of the respondent's interests within the Order Limits. The Applicant is in the process of checking and verifying the information with the respondent and will update the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1) accordingly with any necessary amendments.
RR-259-9	Landowner engagement	2.2 We have reviewed the Book of Reference and the Land Plans, solely for the purpose of determining the land plots that the Applicant believes Our Client has an interest in as listed here. This review has not involved a technical overlay of plans nor full title referencing.	The Applicant notes this comment. Please refer to the Applicant's response to RR-259-8.
RR-259-10	Landowner engagement	2.3 Nevertheless, we understand that the information in the Book of Reference relating to Our Client's interests is not fully accurate and we are therefore undertaking our own land referencing exercise to confirm this information. For example, some of the 'Owner' details are inaccurate and a number of lessees and tenants have not been properly identified. Mindful of the guidance not to	The Applicant notes this comment. Please refer to the Applicant's response to RR-259-8.

Reference	Theme	Issue raised	The Applicant's response
		put individual names in the public domain our Client will provide information to the Applicant in the first instance, and can provide to the Examining Authority if required.	
RR-259-11	Landowner engagement	2.4 For current purposes, suffice to note that the 'Owner' referred to in the Book of Reference for all the land plots identified in the Schedule attached at Annexure 3 should be: 2.4.1 Mark Thistlethwayte, Southwick Estate, The Estate Office, West Street, Southwick, Fareham, Hampshire, PO17 6EA; and 2.4.2 Rupert Thistlethwayte, Southwick Estate, The Estate Office, West Street, Southwick, Fareham, Hampshire, PO17 6EA Rather than the details for the Owner currently referred to in the Book of Reference.	The Applicant notes this comment. Please refer to the Applicant's response to RR-259-8.
RR-259-12	Landowner engagement	3. Negotiations to avoid compulsory acquisition before the application for compulsory purchase powers 3.1 Our Client is keen to reach a private agreement with the Applicant relating to the impacts of the Application. However, there has been very little meaningful engagement to date from the Applicant. Our client acknowledges that meetings have taken place with the Applicant, they have been presented with heads of terms for the acquisition of the necessary rights for the DCO, however there is no genuine desire by the Applicant to negotiate as all of our Clients suggested amendments to the heads of terms were rejected but without good reason. Our Client has suggested alternative locations for the pumping station further west that are closer to a public highway and less impactful on the Southwick Estate. Our Client has also suggested that a long lease of the pumping station be given instead of a freehold acquisition. Both suggestions have been rejected and the Applicant has refused to share the design plans when requested by our Client.	The Applicant is committed to working collaboratively with landowners and it remains the Applicant's firm preference to reach a voluntary agreement for the acquisition of land and rights where possible. As detailed within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken extensive attempts to meaningfully engage with landowners on voluntary agreements and has continued to have productive discussions with them either directly or through their professional representatives.), the Applicant has undertaken extensive attempts to meaningfully engage with landowners on voluntary agreements and has continued to have productive discussions with them either directly or through their professional representatives. In February 2025 a number of the professional representatives, including the respondent's land agent, formed a Land Agent Group to collectively consider and progress discussions on Heads of Terms for voluntary agreements to ensure that all land agents representing landowners impacted by the project were represented equally, regardless of land holding or perceived impact. The Applicant issued Heads of Terms to the Land Agent Group on 3 February 2025 to provide them an opportunity to review the proposals and gather comments ahead of the first meeting between the Land Agent Group and the Applicant. The Land Agent Group provided their initial comments on the Heads of Terms on 24 February 2025. Following this, the Applicant undertook a multidisciplinary review of the comments made. In addition to this, several points were also referred to external consultants to ensure a comprehensive review was completed and that the terms were aligned with what was being sought in the DCO application. The Applicant responded to the Land Agent Group on 5 August 2025 with further updates to the Heads of Terms. The first Agent Group meeting was held on 10 September 2025 where the Applicant and the Land Agent Group reviewed and discussed comments on the Heads of Terms. There was a second meeting on 23 January 2026 to

Reference	Theme	Issue raised	The Applicant's response
			discuss further feedback from the Land Agent Group, after which the Applicant issued the final template for the Heads of Terms on 26 February 2026. Following this, the Applicant commenced issuing Heads of Terms to landowners on 6 March 2026. The Applicant then reviewed further feedback received in June 2026 from the Land Agent Group on both the terms and commercial offer. A third Land Agent Group meeting was held to discuss these points further on the 14 July 2026. Based on this feedback the Applicant wrote to all landowners on the 7 August 2026 with an improved commercial offer and amended terms to address further points from the Land Agent Group. The Applicant met with the respondent's land agent on 10 November 2026 where progress was made on the Heads of Terms. The Applicant considers that this sustained programme of engagement and negotiation demonstrates that significant efforts have been made to secure voluntary agreements prior to, and alongside, the compulsory acquisition process. Finally, the Applicant also prepared a technical note which was issued to the respondent's representatives on the 15 May 2026, which detailed the scheme development process undertaken for Intermediate Pumping Station F which considered the impacts on Welborne Garden Village and responded to alternative sites proposed by the respondent. The Applicant also signposted the respondent's land agent to relevant DCO documents and design plans submitted as part of the DCO application on the 18 August 2026. The Applicant remains willing to discuss voluntary agreements and is continuing to engage with the respondent's land agent regarding their feedback and comments on the Heads of Terms.
RR-259-13	Land use and agriculture	4. Impacts on the Southwick Estate 4.1 The Schedule attached at Annexure 3 sets out, in detail and plot by plot, the negative impacts of the Application on the Southwick Estate if granted. Our Clients rely on that in full. In broad terms, some key points are: 4.1.1 The new access over land plot 12-004 will mean that heavy construction vehicles pass through Albany Farm Business Centre's car park, which will affect the use of the land by the six adjoining tenants. It is anticipated that it (and the construction compound adjacent to the Southwick Estate) will cause considerable inconvenience and disturbance to the various commercial tenants (including noise, vibration and making the park a less attractive place to run their businesses) and this will make the units within the business park difficult to let during the construction process (and potentially in the long term).	The Applicant acknowledges this comment. Albany Business Centre has been identified as a cluster of businesses within the study area and has been considered within Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091]. The assessment considers effects on businesses from impacts on local road networks and from changes in their operating environment. ES Chapter 12 Land use and agriculture [APP-091] identifies that businesses at Albany Business Centre could experience temporary impacts on access associated with road closures on Chalk Lane during construction. However, access to businesses would be maintained at all times. A Framework Construction Traffic Management Plan (CTMP) [APP-415] has been developed to reduce construction traffic impacts and the potential for disruption to access. The assessment presented in ES Chapter 12 Land use and agriculture [APP-091] concludes that the effect on businesses at Albany Farm Business Centre would be minor adverse and not significant in EIA terms.

Reference	Theme	Issue raised	The Applicant's response
			The construction and operational phase noise and vibration impacts of the Project have been assessed, as reported in ES Chapter 15 Noise and vibration [APP-094]. With reference to the construction noise and vibration assessment, as set out in ES Appendix 15.1 Construction noise and vibration assessment [APP-179] Albany Farmhouse (Albany Farm Care Home, R36, located a minimum of 100 m south of the proposed access route), would be affected by low or negligible levels of construction noise, below baseline residual sound levels, with no night-time construction activity. Nevertheless, as a minimum all construction noise impacts/effects would be mitigated through the implementation of Best Practicable Means (BPM) with additional noise and vibration mitigation measures where required. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), [APP-413] and [APP-414] for documents 2 and 3 provides potential mitigation options, the final package of noise mitigation will be identified in a Noise and Vibration Management Plan to be submitted to each local planning authority for approval prior to commencement of construction. Consequently, no significant construction noise and/or vibration impacts/effects would result. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of the Project, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-14	Land use and agriculture	4.1.2 The adjoining building to the South is used as a care home for vulnerable and/or disabled adults who will also be similarly disturbed by the current proposed access route over land plot 12-004. The care home has operated there for over 10 years and cares for adults with learning disabilities and autism. The care home makes use of a large secure maintained garden which also has a sensory unit shed which will be particularly sensitive to the noise and disturbance caused by construction traffic. There is a significant risk that the families of the patients will withdraw them from the care home once the impacts of construction commence and it will be difficult to find another tenant in the same planning use class that would be willing to occupy the building. An alternative route could be agreed that does not have such a detrimental impact.	The Applicant acknowledges this comment. Construction compound Intermediate Pumping Station (IPS) F is to be located on land approximately 290m to the east of the care home and access is via Chalk Lane, to the north of Albany Farm Business Park. At its nearest point, the new access track would be approximately 135m from the care home. Albany Farm Care Home has been assessed within ES Chapter 12 Land use and agriculture [APP-091] as a high-sensitivity receptor due to the nature of its occupants. The assessment notes that the care home provides care and support for adults who may have a learning disability, mental health condition or physical disability. ES Chapter 12 Land use and agriculture [APP-091] identifies that access to the care home would be maintained at all times. Access to the construction compound for IPS-F would be via a new means of access constructed within the Order Limits north of Albany Farm Business Park and, as assessed, no construction traffic would pass in proximity to Albany Farm Care Home. The assessment concludes that the magnitude of impact would be negligible, resulting in a minor adverse effect which is not significant. ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1) includes consideration of health effects on sensitive and vulnerable population groups and recognises that the residents at the care

Reference	Theme	Issue raised	The Applicant's response
			home have a high sensitivity to effects. The health assessment takes account of embedded mitigation and the findings of the relevant environmental topic assessments, including noise, air quality, traffic and transport, and concludes on the likely significance of effects on health and wellbeing. No significant visual or noise effects on the Albany Farm Care Home have been identified in ES Chapter 13 Landscape and visual [APP-092], and ES Chapter 15 Noise and vibration [APP-094]. The health assessment concludes that the magnitude of impact on the care home environment would be negligible and the health effect on residents is neutral.
RR-259-15	Noise and vibration	4.1.3 Southwick Estate land (for example in Plot 06-094 and 06-106) will be adjacent to the new Pump Station E, suffering noise and adverse visual impact and stymying future residential development.	The likely noise effects of Break Pressure Tank/ Intermediate Pumping Station E (BPT/IPS-E) (based on worst case assumptions) at the most affected existing Noise and Vibration Sensitive Receptors (NVSRs), including locations with planning consent for noise-sensitive development, are assessed in ES Chapter 15 Noise and vibration [APP-094]. Table 15-39 shows that the threshold for likely significant effects is not anticipated to be exceeded at NVSR R20, closest to and potentially most affected by noise from BPT/IPS-E, a very similar distance from the BPT/IPS-E as Southwick Estate land. On the basis that significant effects are not anticipated to be exceeded at existing NVSRs and that potential future NVSRs would be a very similar distance (assuming built on the Estate boundary), noise emissions from BPT/IPS-E would not stymy future residential development on land at Southwick Estate. The likely landscape and visual effects of BPT/IPS-E are assessed in ES Chapter 13 Landscape and visual [APP-092]. As set out in response RR-259-20, the design incorporates embedded landscape mitigation measures and the assessment concludes that residual operational effects would not be significant for the majority of receptors assessed. The exception is VP022 on New Down Lane, where localised significant visual effects have been identified with respect to users of the Public Right of Way due to the proximity to BPT/IPS-E and the loss of open views from a short section of the route.
RR-259-16	Landowner engagement	4.1.4 The buildings and businesses at Albany Business Centre and Albany Farm will all be impacted by the compulsory acquisition of land plots 11-022, 11019, 11-015 and 11-014 due to the proposed use of those plots for new plant. Again, there is likely to be noise and vibration disturbance as well as the negative visual impact of having the new plant replace green, agricultural fields.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Please refer to RR-259-13 and RR-259-14 for the Applicant's response to how impacts on Albany Business Centre and Albany Farm Care Home have been assessed. ES Chapter 13 Landscape and visual [APP-092] acknowledges that the construction and operation of new plant on the relevant land plots will alter the existing agricultural and rural character of the area. However, ES Chapter 13 [APP-092] sets out a series of mitigation measures to address this, including siting permanent structures to take advantage of existing vegetation and associating them with existing development to reduce visual intrusion. Notably,

Reference	Theme	Issue raised	The Applicant's response
			ES Chapter 13 [APP-092] specifically references Albany Farm in the context of the future visual baseline, noting that the background of agricultural fields, hedgerows and woodland in that area would be unaltered by the Project. By year 15 of operation, none of the residual landscape effects are considered significant, as reinstated and new planting will have established sufficiently to integrate the above-ground plant into the landscape and restore baseline conditions.
RR-259-17	Location of the proposed pipeline routes	4.1.5 There are alternative routes available. For example, rather than progressing through plots 06-106, 06-094, 07-001, 07-002, 07-003 and 07-004 the line of the route of the tunnel could run along land owned by (i) Portsmouth Water Limited (PM29334), Portsmouth City Council (title no PM24580), utilising public land rather than private land. See the plans attached at Annexure 4 identifying the land affected by the DCO with annotations showing the proposed alternative location over land in public ownership to the South. You will note that route of the new tunnel proposed to be located on the Southwick Estate (privately owned land) could be located on public owned land thereby having a considerable reduction of the impact of the scheme on the Southwick Estate. In addition, our Client has been provided with little detail about the depth of the tunnel which needs to be considered properly as this could have a detrimental impact on agricultural uses and the growth of crops. No information has been provided about any above ground elements for the tunnel such as release valves or maintenance access. Without this information it is difficult to properly assess the full impact of the proposed tunnel.	The Applicant considered a pipeline route proposed by the Respondent, as set out in Section 5.5 of the Scheme Development Report – 1 of 3 documents [APP-073]. A pipeline route further south in this location would be closer to Fort Widley which is a schedule monument and Grade II* listed building, and therefore afforded a high level of protection in national planning policy. Additionally, this would move construction works to a higher topographical point and therefore they would be more visible, particularly from the South Downs National Park to the north. National parks are also afforded a high level of protection in national planning policy. In summary, locating the pipeline in the suggested location would increase the adverse impacts of the Project on the historic environment and the national park. If the tunnel shaft were to be located in the alternative location suggested by the Respondent, the tunnel shaft would need to be considerably deeper, as the alternative location is at a higher topographic point than the proposed location. As well as this, it would need to pass directly under Portsmouth Water infrastructure located north of Portsdown Hill Road (B2177). The location of any access hatches and valves will be determined at the detailed design stage following approval of the DCO application.
RR-259-18	Landowner engagement	4.1.6 The vast majority of the land comprised in the Southwick Estate hosts shoots (the 'Estate Shoot') 40 days per year, this is run by a sporting club which has been granted a licence from our Client. The sporting club rents a shooting lodge, pheasant pens and other equipment from our Client. The scheme will have a significant impact on the current operations of the Estate Shoot to include planned drives, routes and game cover (and will essentially cut the shoot into two parcels, making management and ongoing use much more difficult). To accommodate the DCO scheme game cover will need to be established elsewhere and this will require some agricultural land to be relinquished. During the construction period the noise is expected to have a detrimental impact on the shoot as this will scare off birds in particular.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. The Applicant confirms that compensation will be paid for any reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-19	Landowner engagement	4.1.7 Much of the affected land within the Southwick Estate is used for agriculture by agricultural tenants, whose farm business will be disrupted during constructions and during operation. This may well lead to crop loss and reduced yields from the land.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. The Applicant confirms that protection for access, drainage and soils included within the Outline

Reference	Theme	Issue raised	The Applicant's response
			Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and the Outline Soil Resource Management Plan at Appendix B therein. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. Where access is required in the future for routine maintenance or repair, the Applicant will give reasonable notice of the intention to carry out the works. This notice period will normally be at least 7 days, unless a shorter period is agreed or it is an emergency. The Applicant confirms that compensation will be paid for any reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-20	Landscape and visual	4.1.8 The DCO will also have adverse landscape or visual impacts for the Southwick Estate, particularly due to the proximity of Pump State E to the Estate and on the many footpaths that run through the Southwick Estate and the adjoining ownerships, the footpaths are shown on the attached plan (Annexure 5) with a dashed green line and the bridleways are shown dashed orange.	Break Point Tank/ Intermediate Pumping Station E (BPT/IPS-E) has been sited and designed to minimise landscape and visual effects. Embedded mitigation includes limiting building heights to a maximum of 8m, embedding the buildings and structures into the hillside to reduce their overall height and visibility, using materials and colours appropriate to the local context, and creating a new landform to the north of the facility with shrub and tree planting. These measures are secured in the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). The likely landscape and visual effects of BPT/IPS-E and the associated pipeline works are assessed in Environmental Statement (ES) Chapter 13 Landscape and visual [APP-092]. The assessment includes representative viewpoints across the surrounding Public Rights of Way (PRoW) network, including views from the Wayfarer's Walk and the Pilgrims' Trail promoted routes. Viewpoint locations are shown in ES Figure 13.22 Representative viewpoints [APP-327], Viewpoint photography is shown in ES Figure 13.23 Viewpoint photography [APP-328 to APP-372 – 45 documents], including photomontages for VP019, VP022 and VP023. The detailed visual assessment is provided in ES Appendix 13.4 Visual baseline and effects [APP-174]. The assessment identifies significant visual effects during construction for users of a number of PRoWs. These effects would be temporary and would arise from construction activity, including earthworks, construction compounds, machinery and the removal of sections of vegetation. Operational effects would reduce as reinstatement and mitigation planting establishes, with residual effects assessed as not significant for most visual receptor groups. However, the assessment identifies a residual moderate adverse and significant visual effect associated with VP022, on footpath 218/28/1 on New Down Lane. This effect is localised and reflects the proximity of the viewpoint

Reference	Theme	Issue raised	The Applicant's response
			to BPT/IPS-E, with the security fence remaining a prominent feature in the foreground despite the establishment of mitigation planting. The viewpoint represents a specific location immediately adjacent to the proposed BPT/IPS-E. As recreational users continue north or south along the footpath, views become more oblique and filtered by existing and proposed vegetation, such that the influence of the security fence is reduced.
RR-259-21	Noise and vibration	The close proximity of Pump Station E will cause noise pollution and will have a negative impact on the future plans to use this part of the Estate for residential development (as part of a future extension of neighbouring Waterlooville).	As noted in RR-259-15 as significant effects associated with BPT/IPS-E are not anticipated to be exceeded at existing NVSRs and potential future NVSRs on the Estate would be a very similar distance (assuming built on the Estate boundary), noise emissions from BPT/IPS-E would not stymy future residential development on land at Southwick Estate.
RR-259-22	Landowner engagement	4.2 Our Client remains willing to engage with the Applicants to consider and provide alternatives, both relating to alternative sites for the proposed infrastructure and/or alternative wording for the rights sought under, or requirements of, the draft DCO.	The Applicant consulted directly on the Intermediate Pumping Station F and pipeline locations during the pre-application stage in 2021, 2022, 2024, 2025, and 2026, providing multiple opportunities for stakeholders and local communities to comment on the proposals. The Scheme Development Report [APP-073, APP-074 and APP-075] sets out the structured process through which alternative options were considered and the reasons for selection of the Project as the preferred solution. The Applicant therefore considers that alternative solutions have been appropriately considered and consulted upon through Project-specific consultation. The Applicant also prepared a technical note which was issued to the respondent's representatives on the 15 May 2026, which detailed the scheme development process undertaken for Intermediate Pumping Station F, considered the impacts on Welborne Garden Village and responded to alternative sites proposed by the respondent. In addition, the Applicant also signposted the respondent's land agent to relevant DCO documents and design plans submitted as part of the DCO application on the 18 August 2026. The Applicant is continuing to engage with the respondent's land agent regarding their feedback and comments. The Applicant met with the respondent's land agent on 10 November 2026 to progress discussions.
RR-259-23	Landowner engagement	Annexure 1 Plans of Southwick Estate	The Applicant notes this comment.
RR-259-24	Landowner engagement	Annexure 2 Title Plan for HP537554	The Applicant notes this comment.
RR-259-25	Landowner engagement	Annexure 3 Schedule Hampshire Water Transfer and Water Recycling Project DCO Schedule	The Applicant notes this comment. Please refer to the Applicant's response to RR-259-8 regarding the Applicant's engagement with the respondent on their land interests.

Reference	Theme	Issue raised	The Applicant's response
		Property: Southwick Estate (title number HP537554 - freehold) Registered Proprietors: Rupert Thistlethwayte and Mark Thistlethwayte as registered proprietors of the Southwick Estate, of Southwick Estate, The Estate Office, West Street, Southwick, Fareham, Hampshire, PO17 6EA Interested Persons Registration Number: F096A935C When considering the plans please note the following key: Relevant plot numbers shown as blue highlight Relevant plot numbers shown as pink highlight Relevant plot numbers shown as yellow highlight Please note the land ownership in respect of the Land Plots below have been identified 'by eye' on review of the various plans and no HMLR SIM searches have been carried out to confirm the position. Therefore, there may be small areas where the boundaries between adjoining landowners are not entirely clear from the Land Plans (particularly for the smallest of Plots). As such there may be minor discrepancies (and HMLR SIM searches required to confirm the position).	
RR-259-26	Landowner engagement	Drawing reference (APP-010) 23008223_PLN_LAND_06 Land Plan number Sheet 6 of 30 Land plots 06-094 Impacts of DCO: now Land is subject to an Agricultural Holdings Act tenancy (AHA) and the proposed DCO may create uncertainty for the tenant and could adversely affect ongoing agricultural management and investment decisions. The impact in this and the adjoining columns of this row could be entirely avoided if the infrastructure was installed on land already owned by Portsmouth City Council (title no PM24580) and Portsmouth Water Limited (PM29334), utilising public land rather than private land) located to the south of the Property.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns regarding uncertainty and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming operations. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions. The Applicant has considered the respondent's comments that the pipeline should be located further south, in land within public ownership. If the pipeline was located in this area the construction works would be located closer to Fort Widley (a scheduled monument) and at a higher topographic point and the works more visible from the South Downs National Park, both of which have a very high level of protection under relevant national planning policy. The pipeline route was selected to reduce impacts on Fort Widley and the South Downs National Park as set out in the Scheme Development Report [APP-073, APP-074 and APP-075].

Reference	Theme	Issue raised	The Applicant's response
RR-259-27	Land use and agriculture	Land plots 06-094 Impacts of DCO: during construction Construction activities are likely to cause disturbance to the agricultural tenant, resulting in crop loss, loss of crop establishment costs, reduced yields, and additional costs associated with reinstatement and reestablishment of farming operations.	The Applicant acknowledges this comment. Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091] considers the effects of the Project on agricultural land holdings, existing agricultural activities and land use receptors. The assessment includes consideration of the temporary and permanent use of land required for the Project and the potential effects on the operational capacity and viability of affected holdings. The Applicant has taken account of the existing use of the land within the assessment of likely significant effects. The Outline Soil Resources Management Plan (SRMP) provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) notes that reinstatement of soils over the pipeline will be undertaken as soon as practicable after installation, and that the timing and management of reinstatement will be agreed with the landowner. Disruption to agricultural land and agricultural workings will be minimised. The assessment concludes that, given the short-term and temporary nature of the works, significant effects on the viability or operational capacity of individual farm holdings are not anticipated. The Applicant has undertaken engagement with agricultural landowners and occupiers to understand the extent and nature of agricultural operations, including the scale and detail of agricultural operations and the seasonality of those operations. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of the Project, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-28	Noise and vibration	Land plots 06-094 Impacts of DCO: during construction There will be noise and dust which will cause disturbance to the tenant and additional costs associated with reinstatement and reestablishment of farming operations.	The construction phase noise and vibration impacts of the Project have been assessed, as reported in ES Chapter 15 Noise and vibration [APP-094]. As a minimum all construction noise impacts/effects would be mitigated through the implementation of BPM with additional noise and vibration mitigation measures where required. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) provides potential mitigation options, the final package of noise mitigation will be identified in a Noise and Vibration Management Plan to be submitted to each local planning authority for approval prior to commencement of construction. Consequently, no significant construction noise and/or vibration impacts/effects would result. The Applicant has assessed the potential impacts of construction dust and particulate matter and odour emissions within section 6.8 of ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1). Commensurate controls are detailed within environmental measures AQ1 to AQ18 as outlined in Table 5-1 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). With the implementation of

Reference	Theme	Issue raised	The Applicant's response
			mitigation measures commensurate to the highest level of risk assessed, the effect of construction dust and particulate matter emissions from the Project is considered not significant. The Outline SRMP provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) notes that reinstatement of soils over the pipeline will be undertaken as soon as practicable after installation, and that the timing and management of reinstatement will be agreed with the landowner. Disruption to agricultural land and agricultural workings will be minimised.
RR-259-29	Land use and agriculture	Land plots 06-094 Impacts of DCO: during construction Any proposed changes to the footpath will cause further disruption to the tenant and will again effect agricultural operations.	The Applicant acknowledges the concern that any changes to public rights of way or access arrangements could result in disruption to agricultural operations. Public Rights of Way are considered within the Framework Rights of Way Management Plan, contained within Appendix B of the Framework Construction Traffic Management Plan (CTMP) [APP-415] , ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1) and ES Chapter 18 Traffic and transport [APP-097] , under review by the project team. ES Chapter 12 Land use and agriculture [APP-091] considers disruption to agricultural operations, loss of access and field severance. Commitments secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), [APP-413] and [APP-414] for documents 2 and 3 include maintaining access to farm tracks where reasonably practicable, provision of private farm access across the working corridor where feasible, and ongoing engagement with affected landowners and occupiers. The assessment concludes that significant effects on the ongoing viability or operational capacity of farm holdings are not anticipated. The Applicant will continue to engage with affected landowners and occupiers regarding access arrangements and construction activities to minimise disruption to agricultural operations where reasonably practicable.
RR-259-30	Noise and vibration	Land plots 06-094 Impacts of DCO: during operation The land in this Land Plot (and other adjoining parts of the Estate) will be adjacent to the proposed Pump Station E on adjoining Land plots 06-095 and 06-096 (on land owned by a third party). The close proximity will cause noise pollution and have a visual impact on this part of the Estate. This will have a negative impact on the future plans to use this part of the Estate for residential development (as part of a future extension of neighbouring Waterlooville).	As noted in RR-259-15, as significant effects associated with BPT/IPS-E are not anticipated to be exceeded at existing NVSRs and potential future NVSRs on the Estate would be a very similar distance (assuming built on the Estate boundary), noise emissions from BPT/IPS-E would not stymy future residential development on land at Southwick Estate.
RR-259-31	Land use and agriculture	Land plots 06-094 Impacts of DCO: during operation	The Applicant notes the concern regarding the potential for operational failure, discharges and associated effects on surrounding agricultural land.

Reference	Theme	Issue raised	The Applicant's response
		Future risk of potential contamination generally (as a result of operational failure) or from planned future discharges into adjoining ditches from the pumping station may result in long-term impacts on surrounding agricultural land through soil compaction, erosion, altered drainage, and potential contamination, which could reduce soil quality. Reduced soil quality and potential soil contamination and higher risk of compaction and there could be soil drainage issues.	The likely significant effects of operational failures, pollution incidents and drainage-related risks have been assessed within Environmental Statement (ES) Chapter 14 Major Accidents and Disasters [APP-093] and ES Chapter 19 Water Environment (Document reference 6.1, DCO Volume 6, Version 1). The assessment identifies mitigation measures including operational monitoring, incident response procedures and pollution management measures to reduce the risk of adverse effects on surrounding land and water receptors. The Outline Soil Resources Management Plan (SRMP), as contained in Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), acknowledges that the main adverse impacts on soils during construction occur as a result of handling in inappropriate conditions, notably compaction and smearing when handling soils that are too wet. Paragraphs B.9.1 to B.9.14 of the Outline SRMP which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) set out the methods for determining appropriate soil handling conditions and criteria for when soil handling may or may not take place. The provisions of the SRMP ensure that damage to soil is avoided or minimised, and that soil structures are maintained, such that the land can be reinstated to its original use as soon as practicable following construction.
RR-259-32	Landowner engagement	Land plots 06-094 Impacts of DCO: during operation This is likely to affect the market rent payable on rent reviews by agricultural tenants, and there is a risk that existing agricultural tenancies could be terminated if the affected land is no longer considered agriculturally productive. This could result in a reduction or loss of rental income to the Estate.	Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP 1 of 3 documents [Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3] and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. Where access is required in the future for routine maintenance or repair, the Applicant will give reasonable notice of the intention to carry out the works. This notice period will normally be at least 7 days, unless a shorter period is agreed or it is an emergency. The Applicant confirms that compensation will be paid for any reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-33	Landowner engagement	Land plots 06-106 Impacts of DCO: now Land is subject to an AHA and the proposed DCO may create uncertainty for the tenant and could adversely affect ongoing agricultural management and investment decisions. The impact in this and the adjoining columns of this row could be entirely avoided if the infrastructure was installed on land already owned by Portsmouth City Council (title no PM24580) and Portsmouth Water Limited	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns regarding uncertainty and agree practical solutions wherever practicable. Please refer to the Applicant's response to RR-259-17 regarding the alternative route suggested in Portsmouth City Council and Portsmouth Water land. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further

Reference	Theme	Issue raised	The Applicant's response
		(PM29334), utilising public land rather than private land) located to the south of the Property.	into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming operations. The Applicant confirms that compensation will be paid for any reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-34	Land use and agriculture	Land plots 06-106 Impacts of DCO: during construction Construction activities are likely to cause disturbance to the agricultural tenant, resulting in crop loss, loss of crop establishment costs, reduced yields, and additional costs associated with reinstatement and reestablishment of farming operations. There will be noise and dust which will cause disturbance to the tenant and additional costs associated with reinstatement and reestablishment of farming operations.	Please refer to the Applicant's response to RR-259-27 and RR-259-28.
RR-259-35	Land use and agriculture	Land plots 06-106 Impact of DCO: during operation The DCO may continue to affect the tenant's productivity and ability to farm the land effectively. If the land is returned to the Estate, operational restrictions may also limit the Estate's future use of the land and negatively affect the viability and success of agricultural or alternative land uses. Soil quality is likely to be reduced, with potential long-term issues relating to soil structure and drainage, further affecting the land's productivity and value.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming operations.
RR-259-36	Landowner engagement	Land plots 06-106 Impact of DCO: during operation This is likely to affect the market rent payable on rent reviews by agricultural tenants, and there is a risk that existing agricultural tenancies could be terminated if the affected land is no longer considered agriculturally productive. This could result in a reduction or loss of rental income to the Estate.	Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. Where access is required in the future for routine maintenance or repair, the Applicant will give reasonable notice of the intention to carry out the works. This notice period will normally be at least 7 days, unless a shorter period is agreed or it is an emergency. The Applicant confirms that compensation will be paid for any reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.

Reference	Theme	Issue raised	The Applicant's response
RR-259-37	Land use and agriculture	Drawing reference (APP-010) 23008233_PLN_LAND_07 Land Plan number Sheet 7 of 30 Land plots 07-001 Impacts of DCO: now Temporary road closures associated with surveys could adversely affect tenants, restrict access, disrupt agricultural practices, and interfere with planned shooting and other estate activities. There is currently little disturbance.	The Applicant notes this comment and is committed to working collaboratively with landowners. The Applicant has endeavoured and will continue to mitigate the impact of its survey programmes on landowners, including any requirements for temporary private road closures. The Applicant undertook a comprehensive set of surveys in 2023, 2024 and 2025 to inform the Environmental Impact Assessment. This was necessary ensure the land impacted by the Project is fully understood and appropriately mitigated. Where possible, access for surveys was agreed with landowners via voluntary access licences. An upfront payment was made to reflect any potential losses suffered as a result of the survey works, but landowners were able to make a claim if losses exceeded that initial payment. The Applicant will continue to engage with affected parties to seek to agree access where required by voluntary agreement where possible and aims to minimise disturbance to existing land uses as far as reasonably practicable.
RR-259-38	Location of the proposed pipeline routes	Land plots 07-001 Impacts of DCO: now The impact in this and the adjoining columns of this row could be entirely avoided if the infrastructure was installed on land already owned by Portsmouth City Council (title no PM24580), utilising public land rather than private land) located to the south of the Property.	The Applicant considered a pipeline route proposed by the Respondent, as set out in Section 5.5 of the Scheme Development Report – 1 of 3 documents [APP-073]. A pipeline route further south in this location would be closer to Fort Widley which is a schedule monument and Grade II* listed building, and therefore afforded a high level of protection in national planning policy. Additionally, this would move construction works to a higher topographical point and therefore they would be more visible, particularly from the South Downs National Park to the north. National parks are also afforded a high level of protection in national planning policy. In summary, locating the pipeline in the suggested location would increase the adverse impacts of the Project on the historic environment and the national park.
RR-259-39	Landowner engagement	Land plots 07-001 Impacts of DCO: during construction Will cause disturbance to tenants and disrupt normal estate operations, including livestock and arable farming activities, as well as shooting undertaken on the estate.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. The Applicant confirms that protection for access, drainage and soils included within the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and the Outline Soil Resource Management Plan at Appendix B therein. The Applicant confirms that compensation will be paid for any reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.

Reference	Theme	Issue raised	The Applicant's response
RR-259-40	Landowner engagement	Land plots 07-001 Impacts of DCO: during operation Could cause disturbance for tenants, agricultural practice and shoot especially if there is any emergency or maintenance works which need to be carried out.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. Where access is required in the future for routine maintenance or repair, the Applicant will give reasonable notice of the intention to carry out the works. This notice period will normally be at least 7 days, unless a shorter period is agreed or it is an emergency.
RR-259-41	Landowner engagement	Land plots 07-002 Impacts of DCO: now Land is subject to an AHA and the proposed DCO may create uncertainty for the tenant and could adversely affect ongoing agricultural management and investment decisions.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns regarding uncertainty and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming operations. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions.
RR-259-42	Location of the proposed pipeline routes	Land plots 07-002 Impacts of DCO: now The impact in this and the adjoining columns of this row could be entirely avoided if the infrastructure was installed on land already owned by Portsmouth City Council (title no PM24580), utilising public land rather than private land) located to the south of the Property.	The Applicant considered a pipeline route proposed by the Respondent, as set out in Section 5.5 of the Scheme Development Report – 1 of 3 documents [APP-073]. A pipeline route further south in this location would be closer to Fort Widley which is a schedule monument and Grade II* listed building, and therefore afforded a high level of protection in national planning policy. Additionally, this would move construction works to a higher topographical point and therefore they would be more visible, particularly from the South Downs National Park to the north. National parks are also afforded a high level of protection in national planning policy. In summary, locating the pipeline in the suggested location would increase the adverse impacts of the Project on the historic environment and the national park.
RR-259-43	Land use and agriculture	Land plots 07-002 Impacts of DCO: during construction Construction activities are likely to cause disturbance to the agricultural tenant, resulting in crop loss, loss of crop establishment costs, reduced yields, and	Please refer to the Applicant's response to RR-259-27.

Reference	Theme	Issue raised	The Applicant's response
		additional costs associated with reinstatement and re-establishment of farming operations.	
RR-259-44	Noise and vibration	Land plots 07-002 Impacts of DCO: during construction There will be noise and dust which will cause disturbance to the tenant and additional costs associated with reinstatement and re-establishment of farming operations.	The construction phase noise and vibration impacts of the Project have been assessed, as reported in ES Chapter 15 Noise and vibration [APP-094]. The nearest NVSR to land plots 07-002 is R213, to the north. This dwelling will be mainly affected by construction noise associated with the short-term works (<4-weeks), associated with the 'Pipeline –Construction' stage. As a minimum all construction noise impacts/effects would be mitigated through the implementation of BPM with additional noise and vibration mitigation measures where required. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) provides potential mitigation options, the final package of noise mitigation will be identified in a Noise and Vibration Management Plan to be submitted to each local planning authority for approval prior to commencement of construction. Consequently, no significant construction noise and/or vibration impacts/effects would result. The Applicant has assessed the potential impacts of construction dust and particulate matter and odour emissions within section 6.8 of ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1). Commensurate controls are detailed within environmental measures AQ1 to AQ18 as outlined in Table 5-1 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). With the implementation of mitigation measures commensurate to the highest level of risk assessed, the effect of construction dust and particulate matter emissions from the Project is considered to be not significant. The Outline SRMP provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) notes that reinstatement of soils over the pipeline will be undertaken as soon as practicable after installation, and that the timing and management of reinstatement will be agreed with the landowner. Disruption to agricultural land and agricultural workings will be minimised.
RR-259-45	Land use and agriculture	Land plots 07-002 Impacts of DCO: during operation The DCO may continue to affect the tenant's productivity and ability to farm the land effectively. If the land is returned to the Estate, operational restrictions may also limit the Estate's future use of the land and negatively. affect the viability and success of agricultural or alternative land uses. Soil quality is likely to be reduced, with potential long-term issues relating to soil structure and drainage, further affecting the land's productivity and value. This is likely to affect the market rent payable on rent reviews by agricultural tenants, and there is a risk that existing agricultural tenancies could be	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming operations.

Reference	Theme	Issue raised	The Applicant's response
		terminated if the affected land is no longer considered agriculturally productive. This could result in a reduction or loss of rental income to the Estate.	The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of the Project, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-46	Landowner engagement	Land plots 07-003 Impacts of DCO: now Can cause disturbance to tenants, agricultural practice and shoot for surveys etc.	The Applicant has endeavoured and will continue to mitigate the impact of its survey programmes on landowners. The Applicant undertook a comprehensive set of surveys in 2023, 2024 and 2025 to inform the Environmental Impact Assessment. Landowners were notified in advance of survey visits and whilst the Applicant intended to undertake surveys as per the planned programme of works, circumstances arose that required changes to be made to the timings. For example, adverse weather conditions resulted in last-minute changes and a need for additional and supplementary survey requirements arose following observations made during surveys undertaken. All surveys were undertaken at the appropriate time of year, with seasonal ecological surveys undertaken during the appropriate seasons which resulted in multiple visits to the same holdings. However, the Applicant endeavoured to consolidate survey visits where possible to reduce multiple visits by different survey teams to the same land. A comprehensive set of survey data is necessary to inform the Environmental Impact Assessment and ensure the land impacted by the Project is fully understood and appropriately mitigated. The Applicant considers the volume of survey activity to have been proportionate in order to provide a robust assessment. Where possible, access for surveys was agreed with landowners via voluntary access licences. An upfront payment was made to reflect any potential losses suffered as a result of the survey works, but landowners were able to make a claim if losses exceeded that initial payment. The Applicant will continue to engage with affected parties to seek to agree access where required by voluntary agreement where possible and aims to minimise disturbance to existing land uses as far as reasonably practicable.
RR-259-47	Location of the proposed pipeline routes	Land plots 07-003 Impacts of DCO: now The impact in this and the adjoining columns of this row could be entirely avoided if the infrastructure was installed on land already owned by Portsmouth City Council (title no PM24580), utilising public land rather than private land) located to the south of the Property.	The Applicant considered a pipeline route proposed by the Respondent, as set out in Section 5.5 of the Scheme Development Report – 1 of 3 documents [APP-073]. A pipeline route further south in this location would be closer to Fort Widley which is a schedule monument and Grade II* listed building, and therefore afforded a high level of protection in national planning policy. Additionally, this would move construction works to a higher topographical point and therefore they would be more visible, particularly from the South Downs National Park to the north. National parks are also afforded a high level of protection in national planning policy. In summary, locating the pipeline in the suggested location would increase the adverse impacts of the Project on the historic environment and the national park.

Reference	Theme	Issue raised	The Applicant's response
RR-259-48	Landowner engagement	Land plots 07-003 Impacts of DCO: during construction Will cause disturbance for cause disturbance to tenants, agricultural practice (for both livestock and arable farming) and the shoot.	The Applicant acknowledges that during the construction of the project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. The Applicant confirms that protection for access, drainage and soils included within the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and the Outline Soil Resource Management Plan at Appendix B therein.) and the Outline Soil Resource Management Plan at Appendix B therein. The Applicant confirms that compensation will be paid for any reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-49	Landowner engagement	Land plots 07-003 Impacts of DCO: during operation Could cause disturbance for tenants, agricultural practice and shoot especially if there is any emergency or maintenance works which need to be carried out.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. Where access is required in the future for routine maintenance or repair, the Applicant will give reasonable notice of the intention to carry out the works. This notice period will normally be at least 7 days, unless a shorter period is agreed or it is an emergency.
RR-259-50	Landowner engagement	Land plots 07-004 Impacts of DCO: now Survey works undertaken on the Estate have resulted in disturbance to game cover areas, which has adversely affected the operation and management of the shoot. There are concerns regarding health and safety arrangements during the undertaking of surveys near the dell on the Estate on the Estate, particularly where activities are carried out without adequate prior notification or coordination with the landowner.	The Applicant has endeavoured and will continue to mitigate the impact of its survey programmes on landowners. The Applicant undertook a comprehensive set of surveys in 2023, 2024 and 2025 to inform the Environmental Impact Assessment. Landowners were notified in advance of survey visits and whilst the Applicant intended to undertake surveys as per the planned programme of works, circumstances arose that required changes to be made to the timings. For example, adverse weather conditions resulted in last-minute changes and a need for additional and supplementary survey requirements arose following observations made during surveys undertaken. All surveys were undertaken at the appropriate time of year, with seasonal ecological surveys undertaken during the appropriate seasons which resulted in multiple visits to the same holdings. However, the Applicant endeavoured to consolidate survey visits

Reference	Theme	Issue raised	The Applicant's response
			where possible to reduce multiple visits by different survey teams to the same land. A comprehensive set of survey data is necessary to inform the Environmental Impact Assessment and ensure the land impacted by the Project is fully understood and appropriately mitigated. The Applicant considers the volume of survey activity to have been proportionate in order to provide a robust assessment. Where possible, access for surveys was agreed with landowners via voluntary access licences. An upfront payment was made to reflect any potential losses suffered as a result of the survey works, but landowners were able to make a claim if losses exceeded that initial payment. The Applicant will continue to engage with affected parties to seek to agree access where required by voluntary agreement where possible and aims to minimise disturbance to existing land uses as far as reasonably practicable.
RR-259-51	Location of the proposed pipeline routes	Land plots 07-004 Impacts of DCO: now Limited on being able to plan tree and hedge planting due to the uncertainty on the route and the scheme.	Sheet 7 of the Works Plans – 2 of 3 documents [AS-008] shows the location of the Pipeline and construction works in this location. No works will be undertaken outside the Order Limits as shown on the Works Plans [AS-007, AS-008, APP-014]. The Project would be constructed over approximately a five year period which is expected to commence in 2028, however a detailed construction programme has not been defined at this stage and would be developed by the Contractor once appointed.
RR-259-52	Location of the proposed pipeline routes	Land plots 07-004 Impacts of DCO: now The pipeline also makes it difficult to plan Sustainable Farming Initiative (SFI), environmental schemes, cropping rotations and potential diversification (i.e. drives and game covers) and hedge and tree planting.	Sheet 7 of the Works Plans – 2 of 3 documents [AS-008] shows the location of the Pipeline and construction works in this location. No works will be undertaken outside the Order Limits as shown on the Works Plans [AS-007, AS-008, APP-014]. The Project would be constructed over approximately a five year period which is expected to commence in 2028, however a detailed construction programme has not been defined at this stage and would be developed by the Contractor once appointed. Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-53	Location of the proposed pipeline routes	Land plots 07-004 Impacts of DCO: now The impact in this and the adjoining columns of this row could be entirely avoided if the infrastructure was installed on land already owned by	The Applicant considered a pipeline route proposed by the Respondent, as set out in Section 5.5 of the Scheme Development Report – 1 of 3 documents [APP-073]. A pipeline route further south in this location would be closer to Fort Widley which is a schedule monument and Grade II* listed building, and therefore afforded a high level of protection in national planning policy. Additionally, this would move construction works to a higher topographical

Reference	Theme	Issue raised	The Applicant's response
		Portsmouth City Council (title no PM24580), utilising public land rather than private land) located to the south of the Property.	point and therefore they would be more visible, particularly from the South Downs National Park to the north. National parks are also afforded a high level of protection in national planning policy. In summary, locating the pipeline in the suggested location would increase the adverse impacts of the Project on the historic environment and the national park.
RR-259-54	Terrestrial and freshwater biodiversity	Land plots 07-004 Impacts of DCO: during construction Construction activities have the potential to create erosion issues, particularly in and around the dell. This may result in adverse ecological effects on local wildlife, flora and fauna, as well as damage to the surrounding woodland	The Applicant recognises the concern highlighted of the Project's proximity to Southwick Estate and the potential risks of erosion impacts on sensitive ecological features including local wildlife and woodland. The Applicant has undertaken an Ecological Impact Assessment as set out in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1). This has assessed the likely impacts and effects resulting from construction of the Project on sensitive ecological receptors. With the implementation of tertiary measures included in the Outline Construction Environmental Management Plan(s) (CEMP) any effects resulting from erosion impacts would be mitigated. The Outline CEMP submitted with the DCO application, 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1), includes the following measure (WE4): • A Construction Drainage Plan to be prepared post-consent. Measures will include managing site drainage and runoff during construction, as well as measures to reduce or remove the risk of sediment erosion. With implementation of mitigation measures, impacts associated with erosion are not anticipated.
RR-259-55	Construction impacts and effects	Land plots 07-004 Impacts of DCO: during construction Access required for construction and maintenance of the pipeline is likely to result in damage to existing hedgerows and field access tracks. The current access track is not considered suitable for accommodating large construction vehicles and heavy machinery without significant deterioration and the need for reinstatement works.	Land plots 07-004 is accessed via a temporary access from Pigeonhouse lane and Mill Lane as shown in Sheet 8 of the Access and Public Rights of Way Plans - 1 of 2 documents [APP-015]. The Traffic Management Strategy [APP-416] identifies temporary haul-road accesses on either side of Pigeon House Lane associated with construction of the Pipeline. Where an existing private access or track is required to facilitate construction, its condition and suitability for the proposed construction traffic would need to be taken into account in developing the detailed construction access arrangements. Temporary site accesses, tracks and haul roads form part of the anticipated pipeline construction activities, together with any necessary vegetation or hedgerow removal. Where Project construction activities result in damage to an existing access or to an existing access track, appropriate reinstatement would be undertaken following the relevant works. Similarly, where hedgerow removal is required to facilitate temporary construction access, this would be subject to the relevant environmental controls and reinstatement requirements secured through the DCO under the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). Appropriate pre-construction surveys will be

Reference	Theme	Issue raised	The Applicant's response
			undertaken to ensure appropriate reinstatement to as close as reasonably practicable to the original access. The detailed construction access arrangements will therefore be developed by the appointed Contractor within the parameters and controls of the DCO, taking account of the type of construction vehicles and plant requiring access and the existing condition and suitability of the relevant access. The Applicant will continue to engage with the affected landowner as these site-specific arrangements are developed.
RR-259-56	Landowner engagement	Land plots 07-004 Impacts of DCO: during construction The land forms part of established game cover used in connection with the Estate's shooting operations. Construction activities, increased vehicle movements and the loss or disturbance of habitat are likely to disrupt the shoot and could result in economic losses to the Estate.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. The Applicant confirms that protection for access, drainage and soils included within the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and the Outline Soil Resource Management Plan at Appendix B therein The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-57	Landowner engagement	Land plots 07-004 Impacts of DCO: during construction The land is currently managed under a Sustainable Farming Incentive (SFI) agreement. Temporary or permanent disruption to the land resulting from the proposed works may prevent the Estate from meeting the requirements of the scheme, potentially placing the Estate in breach of its agreement and resulting in reductions to grant funding or other financial penalties	The Applicant notes this comment and is committed to working collaboratively with landowners. The Applicant is continuing to engage with the respondent's land agent regarding their feedback and comments. The Applicant met with the respondent's land agent on 10 November 2026 to progress discussions. Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-58	Terrestrial and freshwater biodiversity	Land plots 07-004 Impacts of DCO: during operation The proposed pipeline's proposed location is in close proximity to the dell, creating concerns regarding erosion, surface water run-off and soil instability during both construction and operation. This could have negative impacts on	The Applicant recognises the concern highlighted of the Project's proximity to the Southwick Estate and the potential implications for biodiversity including flora and fauna. The Applicant has undertaken an Ecological Impact Assessment as set out in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1). This has assessed the likely impacts and effects resulting from construction and operation of the Project on sensitive ecological receptors. With the implementation of tertiary

Reference	Theme	Issue raised	The Applicant's response
		wildlife habitats, flora and fauna, and may have wider consequences for the surrounding landscape.	measures included in the Outline CEMP – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1) any impacts would be mitigated. The Outline CEMP includes the following measure (WE4): • A Construction Drainage Plan to be prepared post-consent. Measures will include managing site drainage and runoff during construction, as well as measures to reduce or remove the risk of sediment erosion. A Water Monitoring Plan will be developed post-consent to ascertain the pre-construction baseline and verify predicted impacts to the local surface water and groundwater regime from temporary and permanent construction effects during and post-construction. The Outline Water Monitoring Plan was included in the DCO application. With implementation of tertiary measures, hydrological change impacts are not anticipated. No hydrological change impacts are identified during operation of the Project at this location.
RR-259-59	Landowner engagement	Land plots 07-004 Impacts of DCO: during operation The affected land forms part of the Estate's game cover and the pipeline would restrict the Estate's ability to utilise the land for shooting purposes, resulting in disruption to established and future sporting operations.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. Where access is required in the future for routine maintenance or repair, the Applicant will give reasonable notice of the intention to carry out the works. This notice period will normally be at least 7 days, unless a shorter period is agreed or it is an emergency notice of the intention to carry out the works.
RR-259-60	Land use and agriculture	Land plots 07-005 Impacts of DCO: now Temporary road closures associated with surveys could adversely affect tenants, restrict access, disrupt agricultural practices, and interfere with planned shooting and other estate activities. There is currently little disturbance.	Please refer to the Applicant's response to RR-259-37.
RR-259-61	Location of the proposed pipeline routes	Land plots 07-005 Impacts of DCO: now	Sheet 7 of the Works Plans – 2 of 3 documents [AS-008] shows the location of the Pipeline and construction works in this location. No works will be undertaken outside the Order Limits as shown on the Works Plans [AS-007, AS-008, APP-014]. The Project would be constructed over approximately a five year period which is expected to commence in 2028, however a detailed

Reference	Theme	Issue raised	The Applicant's response
		The pipeline also makes it difficult to plan SFI, environmental schemes, cropping rotations and potential diversification (i.e. drives and game covers) and hedge and tree planting.	construction programme has not been defined at this stage and would be developed by the Contractor once appointed. Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-62	Landowner engagement	Land plots 07-005 Impacts of DCO: during construction May cause disturbance to tenants at Pigeon House Farm, disrupt livestock and arable farming operations, and interfere with the shoot.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. The Applicant confirms that protection for access, drainage and soils included within the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and the Outline Soil Resource Management Plan at Appendix B therein. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-63	Land use and agriculture	Land plots 07-005 Impacts of DCO: during operation Could cause disturbance for tenants, agricultural practice and shoot especially if there is any emergency or maintenance works which need to be carried out.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. Affected landowners and occupiers will be notified and engaged in advance of relevant construction activities.
RR-259-64	Landowner engagement	Land plots 07-006 Impacts of DCO: now Surveys can disturb tenants who live close to the water pipeline proposal.	The Applicant has endeavoured and will continue to mitigate the impact of its survey programmes on landowners and tenants. The Applicant undertook a comprehensive set of surveys in 2023, 2024 and 2025 to inform the Environmental Impact Assessment. Landowners and tenants were notified in advance of survey visits and whilst the Applicant intended to undertake surveys as per the planned programme of

Reference	Theme	Issue raised	The Applicant's response
			works, circumstances arose that required changes to be made to the timings. For example, adverse weather conditions resulted in last-minute changes and a need for additional and supplementary survey requirements arose following observations made during surveys undertaken. All surveys were undertaken at the appropriate time of year, with seasonal ecological surveys undertaken during the appropriate seasons which resulted in multiple visits to the same holdings. However, the Applicant endeavoured to consolidate survey visits where possible to reduce multiple visits by different survey teams to the same land. A comprehensive set of survey data is necessary to inform the Environmental Impact Assessment and ensure the land impacted by the Project is fully understood and appropriately mitigated. The Applicant considers the volume of survey activity to have been proportionate in order to provide a robust assessment. Where possible, access for surveys was agreed with landowners via voluntary access licences. An upfront payment was made to reflect any potential losses suffered as a result of the survey works, but landowners were able to make a claim if losses exceeded that initial payment. The Applicant will continue to engage with affected parties to seek to agree access where required by voluntary agreement where possible and aims to minimise disturbance to existing land uses as far as reasonably practicable.
RR-259-65	Location of the proposed pipeline routes	Land plots 07-006 Impacts of DCO: now The pipeline also makes it difficult to plan SFI, environmental schemes, cropping rotations and potential diversification and hedge and tree planting.	Sheet 7 of the Works Plans – 2 of 3 documents [AS-008] shows the location of the Pipeline and construction works in this location. No works will be undertaken outside the Order Limits as shown on the Works Plans [AS-007, AS-008, APP-014]. The Project would be constructed over approximately a five year period which is expected to commence in 2028, however a detailed construction programme has not been defined at this stage and would be developed by the Contractor once appointed. Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-66	Landowner engagement	Land plots 07-006 Impacts of DCO: during construction Works will disturb tenant and damage improve permanent pasture. This land is currently occupied by an AHA tenant	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. The Applicant confirms that protection for access, drainage and soils included within the Outline Construction Environmental Management Plan (Document reference 7.1, DCO

Reference	Theme	Issue raised	The Applicant's response
			Volume 7, Version 1 for document 1 of 3) and the Outline Soil Resource Management Plan at Appendix B therein. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-67	Landowner engagement	Land plots 07-006 Impacts of DCO: during operation Limit diversification and use of land.	The Applicant wishes to add that none of the restrictions set out in Schedule 5 to Draft Development Consent Order [APP-023] will prohibit the respondent from continuing to use the land for the existing agricultural use once construction is complete. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. The Applicant welcomes information from the respondent if they have plans to develop their land so that, where possible, such developments can be considered during preparation of the detailed design. The Applicant confirms that further engagement will be undertaken with the respondent during the preparation of the detailed design.
RR-259-68	Landowner engagement	Land plots 07-007 Impacts of DCO: now There has been disturbance to the Estate for the need of various surveys which require access to be arranged. Survey works undertaken on the Estate have resulted in disturbance to game cover areas, which has adversely affected the operation and management of the shoot.	The Applicant has endeavoured and will continue to mitigate the impact of its survey programmes on landowners. The Applicant undertook a comprehensive set of surveys in 2023, 2024 and 2025 to inform the Environmental Impact Assessment. Landowners were notified in advance of survey visits and whilst the Applicant intended to undertake surveys as per the planned programme of works, circumstances arose that required changes to be made to the timings. For example, adverse weather conditions resulted in last-minute changes and a need for additional and supplementary survey requirements arose following observations made during surveys undertaken. All surveys were undertaken at the appropriate time of year, with seasonal ecological surveys undertaken during the appropriate seasons which resulted in multiple visits to the same holdings. However, the Applicant endeavoured to consolidate survey visits where possible to reduce multiple visits by different survey teams to the same land. A comprehensive set of survey data is necessary to inform the Environmental Impact Assessment and ensure the land impacted by the Project is fully understood and appropriately mitigated. The Applicant considers the volume of survey activity to have been proportionate in order to provide a robust assessment. Where possible, access for surveys was agreed with landowners via voluntary access licences. An upfront payment was made to reflect any potential losses

Reference	Theme	Issue raised	The Applicant's response
			suffered as a result of the survey works, but landowners were able to make a claim if losses exceeded that initial payment. The Applicant will continue to engage with affected parties to seek to agree access where required by voluntary agreement where possible and aims to minimise disturbance to existing land uses as far as reasonably practicable.
RR-259-69	Landowner engagement	Land plots 07-007 Impacts of DCO: now The pipeline also makes it difficult to plan SFI, environmental schemes, cropping rotations and potential diversification (i.e. drives and game covers) and hedge and tree planting.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming operations. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions. Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-70	Land use and agriculture	Land plots 07-007 Impacts of DCO: during construction The works will disrupt agricultural operations, potentially affect crop production and resulting in reduced harvest yields and associated financial losses.	Please refer to the Applicant's response to RR-259-27.
RR-259-71	Landowner engagement	Land plots 07-007 Impacts of DCO: during construction Land is in SFI and the proposed works may prevent the Estate from meeting the requirements of the scheme, potentially placing the Estate in breach of its agreement and resulting in reductions to grant funding or other financial penalties.	The Applicant notes this comment and is committed to working collaboratively with landowners. The Applicant is continuing to engage with the respondent's land agent regarding their feedback and comments. The Applicant met with the respondent's land agent on 10 November 2026 to progress discussions. Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to

Reference	Theme	Issue raised	The Applicant's response
			circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-72	Landowner engagement	Land plots 07-007 Impacts of DCO: during construction Close proximity to game cover which could then cause disturbance to the shoot.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-73	Socio-economic, tourism and health	Land plots 07-007 Impacts of DCO: during construction Close to disused quarry which poses health and safety issues.	The Applicant acknowledges this concern regarding the proximity of the Project to a disused quarry and the associated health and safety considerations. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), [APP-413] and [APP-414] for documents 2 and 3 sets out a range of safety and security measures that will be implemented during construction. The Outline Construction Environmental Management Plan requires the Contractor to establish and maintain a Quality and Safety Management System to ensure that construction activities are undertaken in accordance with relevant standards and legal requirements. This will include site-specific risk assessments, method statements and compliance with the Construction (Design and Management) Regulations 2015. These measures will take account of site-specific risks and are intended to safeguard the health, safety and wellbeing of workers, residents, businesses and other sensitive receptors throughout the construction period.
RR-259-74	Socio-economic, tourism and health	Land plots 07-007 Impacts of DCO: during operation The affected land forms part of the Estate's game cover. The activities would restrict the Estate's ability to utilise the land for shooting purposes, resulting in disruption to established sporting operations. This could also damage the Estate's shooting reputation.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. Where access is required in the future for routine maintenance or repair, the Applicant will give reasonable notice of the intention to carry out the works. This notice period will normally be at least 7 days, unless a shorter period is agreed or it is an emergency.

Reference	Theme	Issue raised	The Applicant's response
RR-259-75	Land use and agriculture	Land plots 07-007 Impacts of DCO: during operation The proposed works may give rise to economic losses through the temporary or permanent loss of land use. In particular, there is potential for the loss of income associated with shooting activities and the reduction or loss of SFI payments if the works prevent the Estate from complying with the requirements of existing environmental land management agreements.	The Applicant notes this comment and is committed to working collaboratively with landowners. The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. The Applicant confirms that protection for access, drainage and soils included within the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), [APP-413] and [APP-414] for documents 2 and 3 and the Outline Soil Resource Management Plan at Appendix B therein. The Applicant confirms that compensation will be paid for reasonable and substantiated losses, including where Sustainable Farming Incentive (SFI) agreement income is lost, arising as a result of the Project, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss. Where land is managed under SFI agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control.
RR-259-76	Socio-economic, tourism and health	Land plots 07-008 Impacts of DCO: now There is disturbance to the Estate for the need of various surveys which require access to be arranged. Survey works undertaken on the Estate have resulted in disturbance to game cover areas, which has adversely affected the operation and management of the shoot.	The Applicant acknowledges the concerns raised regarding disturbance arising from survey activities and the potential effects on game cover areas and the operation of the shoot. The Applicant undertook a comprehensive programme of surveys in 2023, 2024 and 2025 to inform the Environmental Impact Assessment and design development of the Project. These surveys were necessary to ensure that the potential effects of the Project were fully understood and appropriately assessed and mitigated. Where possible, access for surveys was agreed with landowners through voluntary access agreements. The Applicant has sought to minimise disturbance to existing land uses during the survey process and will continue to engage with affected landowners and occupiers where access is required in the future. The Applicant recognises that survey activities may result in temporary disruption to estate management activities, including shooting interests, and will continue to seek to minimise disturbance where reasonably practicable through ongoing engagement and coordination with affected landowners. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of the Project, in accordance with the Compensation Code. Any claim would be considered on a case-by-case basis, subject to the provision of appropriate evidence and proof of loss.

Reference	Theme	Issue raised	The Applicant's response
RR-259-77	Location of the proposed pipeline routes	Land plots 07-008 Impacts of DCO: now The pipeline also makes it difficult to plan SFI, environmental schemes, cropping rotations and potential diversification (i.e. drives and game covers) and hedge and tree planting.	Sheet 8 of the Works Plans – 2 of 3 documents [AS-008] shows the location of the Pipeline and construction works in this location. No works will be undertaken outside the Order Limits as shown on the Works Plans [AS-007, AS-008, APP-014]. The Project would be constructed over approximately a five year period which is expected to commence in 2028, however a detailed construction programme has not been defined at this stage and would be developed by the Contractor once appointed. Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-78	Landowner engagement	Land plots 07-008 Impacts of DCO: during construction A compound will not comply with SFI requirements which could be a breach of the agreement and the Estate may fail to receive grant funding.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-79	Landowner engagement	Land plots 07-008 Impacts of DCO: during construction A compound is very close to a game cover which will significantly impact this drive which may have a negative economic impact on the shoot.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-80	Land use and agriculture	Land plots 07-008	Please refer to the Applicant's response to RR-259-27.

Reference	Theme	Issue raised	The Applicant's response
		Impacts of DCO: during construction The works are likely to disrupt agricultural operations, potentially affecting crop production and resulting in reduced harvest yields and associated financial losses.	
RR-259-81	Landowner engagement	Land plots 07-008 Impacts of DCO: during operation The affected land forms part of the Estate's game cover activities would restrict the Estate's ability to utilise the land for shooting purposes, resulting in disruption to established sporting operations even if the compound is a temporary addition to the land. This could also damage the Estate's shooting reputation.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. Where access is required in the future for routine maintenance or repair, the Applicant will give reasonable notice of the intention to carry out the works. This notice period will normally be at least 7 days, unless a shorter period is agreed or it is an emergency.
RR-259-82	Land use and agriculture	Land plots 07-008 Impacts of DCO: during operation The proposed works may give rise to economic losses through the temporary or permanent loss of land use. In particular, there is potential for the loss of income associated with shooting activities and the reduction or loss of SFI payments if the works prevent the Estate from complying with the requirements of existing environmental land management agreements.	Please refer to the Applicant's response to RR-259-75.
RR-259-83	Landowner engagement	Drawing reference (APP-010) 23008233_PLN_LAND_08 Land Plan number Sheet 8 of 30 Land plots 07-007 (see row 2 -plot also shown on sheet 7 of 30) Impacts of DCO: now There is disturbance to the Estate for the need of various surveys which require access to be arranged. Survey works undertaken on the Estate have resulted in disturbance to game cover areas, which has adversely affected the operation and management of the shoot.	The Applicant has endeavoured and will continue to mitigate the impact of its survey programmes on landowners. The Applicant undertook a comprehensive set of surveys in 2023, 2024 and 2025 to inform the Environmental Impact Assessment. Landowners were notified in advance of survey visits and whilst the Applicant intended to undertake surveys as per the planned programme of works, circumstances arose that required changes to be made to the timings. For example, adverse weather conditions resulted in last-minute changes and a need for additional and supplementary survey requirements arose following observations made during surveys undertaken. All surveys were undertaken at the appropriate time of year, with seasonal ecological surveys undertaken during the appropriate seasons which resulted in multiple visits to the same holdings. However, the Applicant endeavoured to consolidate survey visits where possible to reduce multiple visits by different survey teams to the same land. A comprehensive set of survey data is necessary to inform the Environmental Impact Assessment and ensure the land impacted by the Project is fully

Reference	Theme	Issue raised	The Applicant's response
			understood and appropriately mitigated. The Applicant considers the volume of survey activity to have been proportionate in order to provide a robust assessment. Where possible, access for surveys was agreed with landowners via voluntary access licences. An upfront payment was made to reflect any potential losses suffered as a result of the survey works, but landowners were able to make a claim if losses exceeded that initial payment. The Applicant will continue to engage with affected parties to seek to agree access where required by voluntary agreement where possible and aims to minimise disturbance to existing land uses as far as reasonably practicable.
RR-259-84	Location of the proposed pipeline routes	Land plots 07-007 Impacts of DCO: now The pipeline also makes it difficult to plan SFI, environmental schemes, cropping rotations and potential diversification (i.e. drives and game covers) and hedge and tree planting.	Sheet 8 of the Works Plans – 2 of 3 documents [AS-008] shows the location of the Pipeline and construction works in this location. No works will be undertaken outside the Order Limits as shown on the Works Plans [AS-007, AS-008, APP-014]. The Project would be constructed over approximately a five year period which is expected to commence in 2028, however a detailed construction programme has not been defined at this stage and would be developed by the Contractor once appointed. Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-85	Land use and agriculture	Land plots 07-007 Impacts of DCO: during construction The works will disrupt agricultural operations, potentially affect crop production and resulting in reduced harvest yields and associated financial losses.	Please refer to the Applicant's response to RR-259-27.
RR-259-86	Landowner engagement	Land plots 07-007 Impacts of DCO: during construction Land is in SFI and the proposed works may prevent the Estate from meeting the requirements of the scheme, potentially placing the Estate in breach of its agreement and resulting in reductions to grant funding or other financial penalties.	The Applicant notes this comment and is committed to working collaboratively with landowners. The Applicant is continuing to engage with the respondent's land agent regarding their feedback and comments. The Applicant met with the respondent's land agent on 10 November 2026 to progress discussions. Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.

Reference	Theme	Issue raised	The Applicant's response
RR-259-87	Landowner engagement	Land plots 07-007 Impacts of DCO: during construction Close proximity to game cover which could then cause disturbance to the shoot.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-88	Construction impacts and effects	Land plots 07-007 Impacts of DCO: during construction Close to disused chalkpit which poses have health and safety issues.	Ground investigations have been completed at key locations associated with the Project where possible to help understand potential health and safety issues. The findings of these surveys are presented in ES Appendix 11.2 Geotechnical and geo-environmental reports - 3 of 18 documents [APP-153]. The Contractor will undertake further investigation and surveys to inform the detailed design where significant risks remain that cannot be mitigated through other methods, such as risk assessment, construction methodology, health and safety practices or personal protective equipment.
RR-259-89	Land use and agriculture	Land plots 07-007 Impacts of DCO: during construction The works are likely to disrupt agricultural operations, potentially affecting crop production and resulting in reduced harvest yields and associated financial losses.	Please refer to the Applicant's response to RR-259-27.
RR-259-90	Landowner engagement	Land plots 07-007 Impacts of DCO: during operation The affected land forms part of the Estate's game cover activities would restrict the Estate's ability to utilise the land for shooting purposes, resulting in disruption to established sporting operations. This could also damage the Estate's shooting reputation.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. Where access is required in the future for routine maintenance or repair, the Applicant will give reasonable notice of the intention to carry out the works. This notice period will normally be at least 7 days, unless a shorter period is agreed or it is an emergency.
RR-259-91	Land use and agriculture	Land plots 07-007 Impacts of DCO: during operation	Please refer to the Applicant's response to RR-259-75.

Reference	Theme	Issue raised	The Applicant's response
		The proposed works may give rise to economic losses through the temporary or permanent loss of land use. In particular, there is potential for the loss of income associated with shooting activities and the reduction or loss of SFI payments if the works prevent the Estate from complying with the requirements of existing environmental land management agreements.	
RR-259-92	Landowner engagement	Land plots 07-008 (see row - plot also shown on sheet 7 of 30) Impacts of DCO: now There is disturbance to the Estate for the need of various surveys which require access to be arranged. Survey works undertaken on the Estate have resulted in disturbance to game cover areas, which has adversely affected the operation and management of the shoot.	The Applicant has endeavoured and will continue to mitigate the impact of its survey programmes on landowners. The Applicant undertook a comprehensive set of surveys in 2023, 2024 and 2025 to inform the Environmental Impact Assessment. Landowners were notified in advance of survey visits and whilst the Applicant intended to undertake surveys as per the planned programme of works, circumstances arose that required changes to be made to the timings. For example, adverse weather conditions resulted in last-minute changes and a need for additional and supplementary survey requirements arose following observations made during surveys undertaken. All surveys were undertaken at the appropriate time of year, with seasonal ecological surveys undertaken during the appropriate seasons which resulted in multiple visits to the same holdings. However, the Applicant endeavoured to consolidate survey visits where possible to reduce multiple visits by different survey teams to the same land. A comprehensive set of survey data is necessary to inform the Environmental Impact Assessment and ensure the land impacted by the Project is fully understood and appropriately mitigated. The Applicant considers the volume of survey activity to have been proportionate in order to provide a robust assessment. Where possible, access for surveys was agreed with landowners via voluntary access licences. An upfront payment was made to reflect any potential losses suffered as a result of the survey works, but landowners were able to make a claim if losses exceeded that initial payment. The Applicant will continue to engage with affected parties to seek to agree access where required by voluntary agreement where possible and aims to minimise disturbance to existing land uses as far as reasonably practicable.
RR-259-93	Landowner engagement	Land plots 07-008 Impacts of DCO: now The pipeline also makes it difficult to plan SFI, environmental schemes, cropping rotations and potential diversification (i.e. drives and game covers) and hedge and tree planting.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming operations. The land will therefore be farmable

Reference	Theme	Issue raised	The Applicant's response
			following reinstatement and the respondent can continue with the current farming operations. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions. Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-94	Landowner engagement	Land plots 07-008 Impacts of DCO: now Survey works undertaken on the Estate have resulted in disturbance to game cover areas, which has adversely affected the operation and management of the shoot.	The Applicant has endeavoured and will continue to mitigate the impact of its survey programmes on landowners. The Applicant undertook a comprehensive set of surveys in 2023, 2024 and 2025 to inform the Environmental Impact Assessment. Landowners were notified in advance of survey visits and whilst the Applicant intended to undertake surveys as per the planned programme of works, circumstances arose that required changes to be made to the timings. For example, adverse weather conditions resulted in last-minute changes and a need for additional and supplementary survey requirements arose following observations made during surveys undertaken. All surveys were undertaken at the appropriate time of year, with seasonal ecological surveys undertaken during the appropriate seasons which resulted in multiple visits to the same holdings. However, the Applicant endeavoured to consolidate survey visits where possible to reduce multiple visits by different survey teams to the same land. A comprehensive set of survey data is necessary to inform the Environmental Impact Assessment and ensure the land impacted by the Project is fully understood and appropriately mitigated. The Applicant considers the volume of survey activity to have been proportionate in order to provide a robust assessment. Where possible, access for surveys was agreed with landowners via voluntary access licences. An upfront payment was made to reflect any potential losses suffered as a result of the survey works, but landowners were able to make a claim if losses exceeded that initial payment. The Applicant will continue to engage with affected parties to seek to agree access where required by voluntary agreement where possible and aims to minimise disturbance to existing land uses as far as reasonably practicable.

Reference	Theme	Issue raised	The Applicant's response
RR-259-95	Location of the proposed pipeline routes	Land plots 07-008 Impacts of DCO: now The pipeline also makes it difficult to plan SFI, environmental schemes, cropping rotations (i.e. drives and game covers) and potential diversification.	Sheet 8 of the Works Plans – 2 of 3 documents [AS-008] shows the location of the Pipeline and construction works in this location. No works will be undertaken outside the Order Limits as shown on the Works Plans [AS-007, AS-008, APP-014]. The Project would be constructed over approximately a five year period which is expected to commence in 2028, however a detailed construction programme has not been defined at this stage and would be developed by the Contractor once appointed. Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-96	Landowner engagement	Land plots 07-008 Impacts of DCO: during construction A compound will not comply with SFI requirements which could be a breach of the agreement and the Estate may fail to receive grant funding.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-97	Landowner engagement	Land plots 07-008 Impacts of DCO: during construction The compound is very close to a game cover which will significantly impact this drive which may have a negative economic impact on the shoot.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-98	Land use and agriculture	Land plots 07-008 Impacts of DCO: during construction	Please refer to the Applicant's response to RR-259-27.

Reference	Theme	Issue raised	The Applicant's response
		The works are likely to disrupt agricultural operations, potentially affecting crop production and resulting in reduced harvest yields and associated financial losses.	
RR-259-99	Landowner engagement	Land plots 07-008 Impacts of DCO: during operation The affected land forms part of the Estate's game cover activities would restrict the Estate's ability to utilise the land for shooting purposes, resulting in disruption to established sporting operations even if the compound is a temporary addition to the land. This could also damage the Estate's shooting reputation.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. Where access is required in the future for routine maintenance or repair, the Applicant will give reasonable notice of the intention to carry out the works. This notice period will normally be at least 7 days, unless a shorter period is agreed or it is an emergency.
RR-259-100	Land use and agriculture	Land plots 07-008 Impacts of DCO: during operation The proposed works may give rise to economic losses through the temporary or permanent loss of land use. In particular, there is potential for the loss of income associated with shooting activities and the reduction or loss of SFI payments if the works prevent the Estate from complying with the requirements of existing environmental land management agreements.	Please refer to the Applicant's response to RR-259-75.
RR-259-101	Landowner engagement	Land plots 08-001 Impacts of DCO: now There is disturbance to the Estate for the need of various surveys which require access to be arranged. Survey works undertaken on the Estate have resulted in disturbance to game cover areas, which has adversely affected the operation and management of the shoot.	The Applicant has endeavoured and will continue to mitigate the impact of its survey programmes on landowners. The Applicant undertook a comprehensive set of surveys in 2023, 2024 and 2025 to inform the Environmental Impact Assessment. Landowners were notified in advance of survey visits and whilst the Applicant intended to undertake surveys as per the planned programme of works, circumstances arose that required changes to be made to the timings. For example, adverse weather conditions resulted in last-minute changes and a need for additional and supplementary survey requirements arose following observations made during surveys undertaken. All surveys were undertaken at the appropriate time of year, with seasonal ecological surveys undertaken during the appropriate seasons which resulted in multiple visits to the same holdings. However, the Applicant endeavoured to consolidate survey visits where possible to reduce multiple visits by different survey teams to the same land. A comprehensive set of survey data is necessary to inform the Environmental Impact Assessment and ensure the land impacted by the Project is fully understood and appropriately mitigated. The Applicant considers the volume of

Reference	Theme	Issue raised	The Applicant's response
			survey activity to have been proportionate in order to provide a robust assessment. Where possible, access for surveys was agreed with landowners via voluntary access licences. An upfront payment was made to reflect any potential losses suffered as a result of the survey works, but landowners were able to make a claim if losses exceeded that initial payment. The Applicant will continue to engage with affected parties to seek to agree access where required by voluntary agreement where possible and aims to minimise disturbance to existing land uses as far as reasonably practicable.
RR-259-102	Landowner engagement	Land plots 08-001 Impacts of DCO: now The pipeline also makes it difficult to plan SFI, environmental schemes, cropping rotations and potential diversification (i.e. drives and game covers) and hedge and tree planting.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming operations. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions. Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-103	Landowner engagement	Land plots 08-001 Impacts of DCO: during construction A compound will not comply with SFI requirements which could be a breach of the agreement and the Estate may fail to receive grant funding.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the

Reference	Theme	Issue raised	The Applicant's response
			Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-104	Landowner engagement	Land plots 08-001 Impacts of DCO: during construction The compound is very close to a game cover which will significantly impact this drive which may have a negative economic impact on the shoot.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be developed as part of the detailed design. The Applicant will continue to engage with affected landowners and occupiers to understand their operational requirements and land use activities, and to identify, develop and agree, where reasonably practicable, appropriate alternative arrangements to minimise the impacts of the temporary construction works. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-105	Landowner engagement	Land plots 08-001 Impacts of DCO: during operation The affected land forms part of the Estate's game cover activities would restrict the Estate's ability to utilise the land for shooting purposes, resulting in disruption to established sporting operations even if the compound is a temporary addition to the land. This could also damage the Estate's shooting reputation.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. Where access is required in the future for routine maintenance or repair, the Applicant will give reasonable notice of the intention to carry out the works. This notice period will normally be at least 7 days, unless a shorter period is agreed or it is an emergency. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions.
RR-259-106	Land use and agriculture	Land plots 08-001 Impacts of DCO: during operation The proposed works may give rise to economic losses through the temporary or permanent loss of land use. In particular, there is potential for the loss of income associated with shooting activities and the reduction or loss of SFI payments if the works prevent the Estate from complying with the requirements of existing environmental land management agreements.	Please refer to the Applicant's response to RR-259-75.

Reference	Theme	Issue raised	The Applicant's response
RR-259-107	Landowner engagement	Land plots 08-002 Impacts of DCO: now As above	Please refer to the response to RR-259-101 and RR-259-102 regarding the Applicant's approach to survey access.
RR-259-108	Landowner engagement	Land plots 08-002 Impacts of DCO: during construction As above	Please refer to the response to RR-259-103 regarding the Applicant's response to the impacts of the DCO during construction.
RR-259-109	Landowner engagement	Land plots 08-002 Impacts of DCO: during operation As above	Please refer to the response to RR-259-105 regarding the Applicant's response to the impacts of the DCO during operation.
RR-259-110	Landowner engagement	Land plots 08-003 Impacts of DCO: now There is disturbance to the Estate for the need of various surveys which require access to be arranged.	The Applicant has endeavoured and will continue to mitigate the impact of its survey programmes on landowners. The Applicant undertook a comprehensive set of surveys in 2023, 2024 and 2025 to inform the Environmental Impact Assessment. Landowners were notified in advance of survey visits and whilst the Applicant intended to undertake surveys as per the planned programme of works, circumstances arose that required changes to be made to the timings. For example, adverse weather conditions resulted in last-minute changes and a need for additional and supplementary survey requirements arose following observations made during surveys undertaken. All surveys were undertaken at the appropriate time of year, with seasonal ecological surveys undertaken during the appropriate seasons which resulted in multiple visits to the same holdings. However, the Applicant endeavoured to consolidate survey visits where possible to reduce multiple visits by different survey teams to the same land. A comprehensive set of survey data is necessary to inform the Environmental Impact Assessment and ensure the land impacted by the Project is fully understood and appropriately mitigated. The Applicant considers the volume of survey activity to have been proportionate in order to provide a robust assessment. Where possible, access for surveys was agreed with landowners via voluntary access licences. An upfront payment was made to reflect any potential losses suffered as a result of the survey works, but landowners were able to make a claim if losses exceeded that initial payment. The Applicant will continue to engage with affected parties to seek to agree access where required by voluntary agreement where possible and aims to minimise disturbance to existing land uses as far as reasonably practicable.

Reference	Theme	Issue raised	The Applicant's response
RR-259-111	Construction impacts and effects	Land plots 08-003 Impacts of DCO: now Surveys by the chalkpit cause particular health and safety concerns.	The Applicant notes the comment. Please refer to the Applicant's response to RR-259-88.
RR-259-112	Landowner engagement	Land plots 08-003 Impacts of DCO: now The pipeline also makes it difficult to plan SFI, environmental schemes, cropping rotations (i.e. drives and game covers) and potential diversification and hedge and tree planting.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement, and the respondent can continue with the current farming operations. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions. Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-113	Construction impacts and effects	Land plots 08-003 Impacts of DCO: during construction Close proximity to chalk pit poses health and safety concerns.	The Applicant notes the comment. Please refer to the Applicant's response to RR-259-88.
RR-259-114	Land use and agriculture	Land plots 08-003 Impacts of DCO: during construction The works will disrupt agricultural operations, potentially affect crop production and resulting in reduced harvest yields and associated financial losses.	Please refer to the Applicant's response to RR-259-27.
RR-259-115	Landowner engagement	Land plots 08-003 Impacts of DCO: during construction Land is in SFI and the proposed works may prevent the Estate from meeting the requirements of the scheme, potentially placing the Estate in breach of its	The Applicant notes this comment and is committed to working collaboratively with landowners. The Applicant is continuing to engage with the respondent's land agent regarding their feedback and comments. The Applicant met with the respondent's land agent on 10 November 2026 to progress discussions.

Reference	Theme	Issue raised	The Applicant's response
		agreement and resulting in reductions to grant funding or other financial penalties.	Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-116	Land use and agriculture	Land plots 08-003 Impacts of DCO: during construction The works are likely to disrupt agricultural operations, potentially affecting crop production and resulting in reduced harvest yields and associated financial losses.	Please refer to the Applicant's response to RR-259-27.
RR-259-117	Landowner engagement	Land plots 08-003 Impacts of DCO: during operation The affected land forms part of the Estate's game cover activities would restrict the Estate's ability to utilise the land for shooting purposes, resulting in disruption to established sporting operations. This could also damage the Estate's shooting reputation.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. Where access is required in the future for routine maintenance or repair, the Applicant will give reasonable notice of the intention to carry out the works. This notice period will normally be at least 7 days, unless a shorter period is agreed or it is an emergency. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions.
RR-259-118	Land use and agriculture	Land plots 08-003 Impacts of DCO: during operation The proposed works may give rise to economic losses through the temporary or permanent loss of land use. In particular, there is potential for the loss of income associated with shooting activities and the reduction or loss of SFI payments if the works prevent the Estate from complying with the requirements of existing environmental land management agreements.	Please refer to the Applicant's response to RR-259-75.
RR-259-119	Land use and agriculture	Land plots 08-004 (subsoil) Impacts of DCO: now	The Applicant acknowledges the concern regarding potential disruption to agricultural operations, shooting activities and wider estate management arising from survey activities associated with the Project.

Reference	Theme	Issue raised	The Applicant's response
		Temporary road closures associated with surveys could adversely affect tenants, restrict access, disrupt agricultural practices, and interfere with planned shooting and other estate activities. There is currently little disturbance.	The Applicant undertook a comprehensive programme of surveys in 2023, 2024 and 2025 to inform the Environmental Impact Assessment and design development of the Project. These surveys were necessary to ensure that the potential effects of the Project were fully understood and appropriately assessed and mitigated. Where possible, access for surveys was agreed with landowners through voluntary access agreements. The Applicant has sought to minimise disturbance to existing land uses during the survey process and has continued to engage with affected landowners and occupiers regarding access requirements and survey activities. The Applicant recognises that survey activities may result in temporary disruption to agricultural operations, shooting interests and other estate activities. The Applicant will continue to seek to minimise disturbance where reasonably practicable through ongoing engagement and coordination with affected parties. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of the Project, in accordance with the Compensation Code. Any claim would be considered on a case-by-case basis, subject to the provision of appropriate evidence and proof of loss.
RR-259-120	Landowner engagement	Land plots 08-004 (subsoil) Impacts of DCO: now Survey works undertaken on the Estate have resulted in disturbance to game cover areas, which has adversely affected the operation and management of the shoot.	The Applicant has endeavoured and will continue to mitigate the impact of its survey programmes on landowners. The Applicant undertook a comprehensive set of surveys in 2023, 2024 and 2025 to inform the Environmental Impact Assessment. Landowners were notified in advance of survey visits and whilst the Applicant intended to undertake surveys as per the planned programme of works, circumstances arose that required changes to be made to the timings. For example, adverse weather conditions resulted in last-minute changes and a need for additional and supplementary survey requirements arose following observations made during surveys undertaken. All surveys were undertaken at the appropriate time of year, with seasonal ecological surveys undertaken during the appropriate seasons which resulted in multiple visits to the same holdings. However, the Applicant endeavoured to consolidate survey visits where possible to reduce multiple visits by different survey teams to the same land. A comprehensive set of survey data is necessary to inform the Environmental Impact Assessment and ensure the land impacted by the Project is fully understood and appropriately mitigated. The Applicant considers the volume of survey activity to have been proportionate in order to provide a robust assessment. Where possible, access for surveys was agreed with landowners via voluntary access licences. An upfront payment was made to reflect any potential losses suffered as a result of the survey works, but landowners were able to make a claim if losses exceeded that initial payment. The Applicant will continue to engage with affected parties to seek to agree access where required by

Reference	Theme	Issue raised	The Applicant's response
			voluntary agreement where possible and aims to minimise disturbance to existing land uses as far as reasonably practicable.
RR-259-121	Landowner engagement	Land plots 08-004 (subsoil) Impacts of DCO: now The pipeline also makes it difficult to plan SFI, environmental schemes, cropping rotations (i.e. drives and game covers) and potential diversification and hedge and tree planting.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement, and the respondent can continue with the current farming operations. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions. Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-122	Land use and agriculture	Land plots 08-004 (subsoil) Impacts of DCO: during construction A road closure would cause disturbance to agricultural operations.	The Applicant acknowledges concerns regarding disruption to agricultural operations from temporary road closures during construction. Temporary road closures and traffic management requirements have been assessed in Environmental Statement (ES) Chapter 18 Traffic and Transport [APP-097]. The assessment concludes that, with the implementation of the Traffic Management Strategy (TMS) [APP-416] , Framework Construction Traffic Management Plan (CTMP) [APP-415] and associated mitigation measures, impacts on access and journey times would be managed and residual effects would generally be minor adverse and not significant. ES Chapter 12 Land use and agriculture [APP-091] recognises that temporary impacts on agricultural land use can arise from disruption to access, movements of livestock, field severance and farming operations. Mitigation secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1) includes maintaining access where reasonably practicable, providing additional access points by agreement with landowners and occupiers where practicable, incorporating gates, stiles or gaps within temporary fencing, and ongoing engagement with affected landowners to minimise disruption to agricultural activities. ES Chapter 12 Land use and agriculture [APP-091] concludes that, given the short-term and temporary

Reference	Theme	Issue raised	The Applicant's response
			nature of the works and the measures secured through the Outline CEMP, significant effects on the ongoing viability or operational capacity of farm holdings are not anticipated.
RR-259-123	Landowner engagement	Land plots 08-004 (subsoil) Impacts of DCO: during operation n/a	The Applicant notes this comment.
RR-259-124	Land use and agriculture	Land plots 08-005 Impacts of DCO: now Temporary road closures associated with surveys could adversely affect tenants, restrict access, disrupt agricultural practices, and interfere with planned shooting and other estate activities. There is currently little disturbance.	Please refer to the Applicant's response to RR-259-37.
RR-259-125	Landowner engagement	Land plots 08-005 Impacts of DCO: now Survey works undertaken on the Estate have resulted in disturbance to game cover areas, which has adversely affected the operation and management of the shoot.	The Applicant has endeavoured and will continue to mitigate the impact of its survey programmes on landowners. The Applicant undertook a comprehensive set of surveys in 2023, 2024 and 2025 to inform the Environmental Impact Assessment. Landowners were notified in advance of survey visits and whilst the Applicant intended to undertake surveys as per the planned programme of works, circumstances arose that required changes to be made to the timings. For example, adverse weather conditions resulted in last-minute changes and a need for additional and supplementary survey requirements arose following observations made during surveys undertaken. All surveys were undertaken at the appropriate time of year, with seasonal ecological surveys undertaken during the appropriate seasons which resulted in multiple visits to the same holdings. However, the Applicant endeavoured to consolidate survey visits where possible to reduce multiple visits by different survey teams to the same land. A comprehensive set of survey data is necessary to inform the Environmental Impact Assessment and ensure the land impacted by the Project is fully understood and appropriately mitigated. The Applicant considers the volume of survey activity to have been proportionate in order to provide a robust assessment. Where possible, access for surveys was agreed with landowners via voluntary access licences. An upfront payment was made to reflect any potential losses suffered as a result of the survey works, but landowners were able to make a claim if losses exceeded that initial payment. The Applicant will continue to engage with affected parties to seek to agree access where required by voluntary agreement where possible and aims to minimise disturbance to existing land uses as far as reasonably practicable.

Reference	Theme	Issue raised	The Applicant's response
RR-259-126	Land use and agriculture	Land plots 08-005 Impacts of DCO: during construction A road closure would cause disturbance to agricultural operations.	Please refer to the Applicant's response to RR-259-122.
RR-259-127	Traffic and transport	Land plots 08-005 Impacts of DCO: during operation Any disturbance may have a consequential negative impact on the shoot.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. The Applicant confirms that protection for access, drainage and soils included within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), [APP-413] and [APP-414] for documents 2 and 3 and the Outline Soil Resource Management Plan at Appendix B therein. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of the Project, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-128	Landowner engagement	Land plots 08-006 Impacts of DCO: now There is disturbance to the Estate for the need of various surveys which require access to be arranged. Survey works undertaken on the Estate have resulted in disturbance to game cover areas, which has adversely affected the operation and management of the shoot.	The Applicant has endeavoured and will continue to mitigate the impact of its survey programmes on landowners. The Applicant undertook a comprehensive set of surveys in 2023, 2024 and 2025 to inform the Environmental Impact Assessment. Landowners were notified in advance of survey visits and whilst the Applicant intended to undertake surveys as per the planned programme of works, circumstances arose that required changes to be made to the timings. For example, adverse weather conditions resulted in last-minute changes and a need for additional and supplementary survey requirements arose following observations made during surveys undertaken. All surveys were undertaken at the appropriate time of year, with seasonal ecological surveys undertaken during the appropriate seasons which resulted in multiple visits to the same holdings. However, the Applicant endeavoured to consolidate survey visits where possible to reduce multiple visits by different survey teams to the same land. A comprehensive set of survey data is necessary to inform the Environmental Impact Assessment and ensure the land impacted by the Project is fully understood and appropriately mitigated. The Applicant considers the volume of survey activity to have been proportionate in order to provide a robust assessment. Where possible, access for surveys was agreed with landowners via voluntary access licences. An upfront payment was made to reflect any potential losses

Reference	Theme	Issue raised	The Applicant's response
			suffered as a result of the survey works, but landowners were able to make a claim if losses exceeded that initial payment. The Applicant will continue to engage with affected parties to seek to agree access where required by voluntary agreement where possible and aims to minimise disturbance to existing land uses as far as reasonably practicable.
RR-259-129	Landowner engagement	Land plots 08-006 Impacts of DCO: now The pipeline also makes it difficult to plan SFI, environmental schemes, cropping rotations (i.e. drives and game covers) and potential diversification and hedge and tree planting.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming operations. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions. Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-130	Landowner engagement	Land plots 08-006 Impacts of DCO: during construction A compound will not comply with SFI requirements which could be a breach of the agreement and the Estate may fail to receive grant funding.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.

Reference	Theme	Issue raised	The Applicant's response
RR-259-131	Landowner engagement	Land plots 08-006 Impacts of DCO: during construction The compound is very close to a game cover which will significantly impact this drive which may have a negative economic impact on the shoot.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-132	Land use and agriculture	Land plots 08-006 Impacts of DCO: during construction A road closure would cause disturbance to agricultural operations.	Please refer to the Applicant's response to RR-259-122.
RR-259-133	Land use and agriculture	Land plots 08-006 Impacts of DCO: during construction The works are likely to disrupt agricultural operations, potentially affecting crop production and resulting in reduced harvest yields and associated financial losses.	Please refer to the Applicant's response to RR-259-27.
RR-259-134	Landowner engagement	Land plots 08-006 Impacts of DCO: during operation The affected land forms part of the Estate's game cover. Activities would restrict the Estate's ability to utilise the land for shooting purposes, resulting in disruption to established sporting operations even if the compound is a temporary addition to the land. This could also damage the Estate's shooting reputation.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. Where access is required in the future for routine maintenance or repair, the Applicant will give reasonable notice of the intention to carry out the works. This notice period will normally be at least 7 days, unless a shorter period is agreed or it is an emergency.
RR-259-135	Land use and agriculture	Land plots 08-006 Impacts of DCO: during operation The proposed works may give rise to economic losses through the temporary or permanent loss of land use. In particular, there is potential for the loss of income associated with shooting activities and the reduction or loss of SFI	Please refer to the Applicant's response to RR-259-75.

Reference	Theme	Issue raised	The Applicant's response
		payments if the works prevent the Estate from complying with the requirements of existing environmental land management agreements.	
RR-259-136	Landowner engagement	Land plots 08-007 Impacts of DCO: now Can cause disturbance to tenants, agricultural practice and shoot for surveys etc. Survey works undertaken on the Estate have resulted in disturbance to game cover areas, which has adversely affected the operation and management of the shoot.	The Applicant has endeavoured and will continue to mitigate the impact of its survey programmes on landowners. The Applicant undertook a comprehensive set of surveys in 2023, 2024 and 2025 to inform the Environmental Impact Assessment. Landowners were notified in advance of survey visits and whilst the Applicant intended to undertake surveys as per the planned programme of works, circumstances arose that required changes to be made to the timings. For example, adverse weather conditions resulted in last-minute changes and a need for additional and supplementary survey requirements arose following observations made during surveys undertaken. All surveys were undertaken at the appropriate time of year, with seasonal ecological surveys undertaken during the appropriate seasons which resulted in multiple visits to the same holdings. However, the Applicant endeavoured to consolidate survey visits where possible to reduce multiple visits by different survey teams to the same land. A comprehensive set of survey data is necessary to inform the Environmental Impact Assessment and ensure the land impacted by the Project is fully understood and appropriately mitigated. The Applicant considers the volume of survey activity to have been proportionate in order to provide a robust assessment. Where possible, access for surveys was agreed with landowners via voluntary access licences. An upfront payment was made to reflect any potential losses suffered as a result of the survey works, but landowners were able to make a claim if losses exceeded that initial payment. The Applicant will continue to engage with affected parties to seek to agree access where required by voluntary agreement where possible and aims to minimise disturbance to existing land uses as far as reasonably practicable.
RR-259-137	Landowner engagement	Land plots 08-007 Impacts of DCO: now The pipeline also makes it difficult to plan SFI, environmental schemes, cropping rotations (i.e. drives and game covers) and potential diversification and hedge and tree planting.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming operations. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions.

Reference	Theme	Issue raised	The Applicant's response
			Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-138	Land use and agriculture	Land plots 08-007 Impacts of DCO: during construction The works will disrupt agricultural operations, potentially affect crop production and resulting in reduced harvest yields and associated financial losses.	Please refer to the Applicant's response to RR-259-27.
RR-259-139	Landowner engagement	Land plots 08-007 Impacts of DCO: during construction Land is in SFI and the proposed works may prevent the Estate from meeting the requirements of the scheme, potentially placing the Estate in breach of its agreement and resulting in reductions to grant funding or other financial penalties.	The Applicant notes this comment and is committed to working collaboratively with landowners. The Applicant is continuing to engage with the respondent's land agent regarding their feedback and comments. The Applicant met with the respondent's land agent on 10 November 2026 to progress discussions. Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-140	Land use and agriculture	Land plots 08-007 Impacts of DCO: during construction The works are likely to disrupt agricultural operations, potentially affecting crop production and resulting in reduced harvest yields and associated financial losses.	Please refer to the Applicant's response to RR-259-27.
RR-259-141	Landowner engagement	Land plots 08-007 Impacts of DCO: during operation The affected land forms part of the Estate's game cover activities would restrict the Estate's ability to utilise the land for shooting purposes, resulting in disruption to established sporting operations. This could also damage the Estate's shooting reputation.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement, and the respondent can

Reference	Theme	Issue raised	The Applicant's response
			continue with the current farming and shoot operations. Where access is required in the future for routine maintenance or repair, the Applicant will give reasonable notice of the intention to carry out the works. This notice period will normally be at least 7 days, unless a shorter period is agreed or it is an emergency.
RR-259-142	Land use and agriculture	Land plots 08-007 Impacts of DCO: during operation The proposed works may give rise to economic losses through the temporary or permanent loss of land use. In particular, there is potential for the loss of income associated with shooting activities and the reduction or loss of SFI payments if the works prevent the Estate from complying with the requirements of existing environmental land management agreements.	Please refer to the Applicant's response to RR-259-75.
RR-259-143	Landowner engagement	Drawing reference (APP-010) 23008223_PLN_LAND_09 Land Plan number Sheet 9 of 30 Land plots 08-007 (refer to the row 3 - plot also shown on sheet 9 of 30) Impacts of DCO: now As above	Please refer to the response to RR-259-136 regarding the Applicant's approach to survey access.
RR-259-144	Landowner engagement	Land plots 08-007 Impacts of DCO: during construction Land plots 08-007 As above	Please refer to the response to RR-259-138 regarding the Applicant's response to the impacts of the DCO during construction.
RR-259-145	Landowner engagement	Land plots 08-007 Impacts of DCO: during operation As above	Please refer to the response to RR-259-141 regarding the Applicant's response to the impacts of the DCO during operation.
RR-259-146	Landowner engagement	Land plots 09-001 Impacts of DCO: now Can cause disturbance to tenants, agricultural practice and shoot for surveys etc.	The Applicant has endeavoured and will continue to mitigate the impact of its survey programmes on landowners. The Applicant undertook a comprehensive set of surveys in 2023, 2024 and 2025 to inform the Environmental Impact Assessment. Landowners were notified in advance of survey visits and whilst the Applicant intended to undertake surveys as per the planned programme of works, circumstances arose that required changes to be made to the timings. For example, adverse weather conditions resulted in last-minute changes and a need for additional and supplementary survey requirements arose following observations made during surveys undertaken. All surveys were undertaken at

Reference	Theme	Issue raised	The Applicant's response
			the appropriate time of year, with seasonal ecological surveys undertaken during the appropriate seasons which resulted in multiple visits to the same holdings. However, the Applicant endeavoured to consolidate survey visits where possible to reduce multiple visits by different survey teams to the same land. A comprehensive set of survey data is necessary to inform the Environmental Impact Assessment and ensure the land impacted by the Project is fully understood and appropriately mitigated. The Applicant considers the volume of survey activity to have been proportionate in order to provide a robust assessment. Where possible, access for surveys was agreed with landowners via voluntary access licences. An upfront payment was made to reflect any potential losses suffered as a result of the survey works, but landowners were able to make a claim if losses exceeded that initial payment. The Applicant will continue to engage with affected parties to seek to agree access where required by voluntary agreement where possible and aims to minimise disturbance to existing land uses as far as reasonably practicable.
RR-259-147	Land use and agriculture	Land plots 09-001 Impacts of DCO: during construction A road closure would interfere to agricultural operations.	Please refer to the Applicant's response to RR-259-122.
RR-259-148	Land use and agriculture	Land plots 09-001 Impacts of DCO: during operation Any disturbance may have a consequential negative impact on the shoot.	Please refer to the Applicant's response to RR-259-127.
RR-259-149	Landowner engagement	Land plots 09-002 Impacts of DCO: now Can cause disturbance to tenants, agricultural practice and shoot for surveys etc. Survey works undertaken on the Estate have resulted in disturbance to game cover areas, which has adversely affected the operation and management of the shoot.	The Applicant has endeavoured and will continue to mitigate the impact of its survey programmes on landowners. The Applicant undertook a comprehensive set of surveys in 2023, 2024 and 2025 to inform the Environmental Impact Assessment. Landowners were notified in advance of survey visits and whilst the Applicant intended to undertake surveys as per the planned programme of works, circumstances arose that required changes to be made to the timings. For example, adverse weather conditions resulted in last-minute changes and a need for additional and supplementary survey requirements arose following observations made during surveys undertaken. All surveys were undertaken at the appropriate time of year, with seasonal ecological surveys undertaken during the appropriate seasons which resulted in multiple visits to the same holdings. However, the Applicant endeavoured to consolidate survey visits where possible to reduce multiple visits by different survey teams to the same land.

Reference	Theme	Issue raised	The Applicant's response
			A comprehensive set of survey data is necessary to inform the Environmental Impact Assessment and ensure the land impacted by the Project is fully understood and appropriately mitigated. The Applicant considers the volume of survey activity to have been proportionate in order to provide a robust assessment. Where possible, access for surveys was agreed with landowners via voluntary access licences. An upfront payment was made to reflect any potential losses suffered as a result of the survey works, but landowners were able to make a claim if losses exceeded that initial payment. The Applicant will continue to engage with affected parties to seek to agree access where required by voluntary agreement where possible and aims to minimise disturbance to existing land uses as far as reasonably practicable.
RR-259-150	Landowner engagement	Land plots 09-002 Impacts of DCO: now The pipeline also makes it difficult to plan SFI, environmental schemes, cropping rotations (i.e. drives and game covers) and potential diversification and hedge and tree planting.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement, and the respondent can continue with the current farming operations. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions. Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-151	Noise and vibration	Land plots 09-002 Impacts of DCO: during construction There will be noise and dust which will cause disturbance to the both the nearby buy commercial and residential tenants.	The construction phase noise and vibration impacts of the Project have been assessed, as reported in ES Chapter 15 Noise and vibration [APP-094]. The nearest NVSR to land plot 09-002 is R161, to the north-west. This dwelling will be mainly affected by construction noise associated with the short-term works (<4-weeks), associated with the 'Pipeline –Construction' stage. As a minimum all construction noise impacts/effects would be mitigated through the implementation of Best Practicable Means with additional noise

Reference	Theme	Issue raised	The Applicant's response
			and vibration mitigation measures where required. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) provides potential mitigation options, the final package of noise mitigation will be identified in a Noise and Vibration Management Plan to be submitted to each Local Planning Authority for approval prior to commencement of construction. Consequently, no significant construction noise and/or vibration impacts/effects would result. The Applicant has assessed the potential impacts of construction dust and particulate matter and odour emissions within section 6.8 of ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1) Section 6.8. Commensurate controls are detailed within environmental measures AQ1 to AQ18 as outlined in Table 5-1 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). With the implementation of mitigation measures commensurate to the highest level of risk assessed, the effect of construction dust and particulate matter emissions from the Project is considered to be not significant.
RR-259-152	Location of the proposed pipeline	Land plots 09-002 Impacts of DCO: during construction The proposed pipeline goes through 1.79 acres of woodland which does not seem a sensible route and will pose environmental impacts.	As shown on Sheet 9 of the Works Plans – 2 of 3 documents [AS-008] the Applicant has retained flexibility in the Order Limits surrounding this area of woodland, so that the final location of the Pipeline can be determined following further environmental surveys, including for protected species.
RR-259-153	Landowner engagement	Land plots 09-002 Impacts of DCO: during construction The land is currently managed under a SFI agreement. Temporary or permanent disruption to the land resulting from the proposed works may prevent the Estate from meeting the requirements of the scheme, potentially placing the Estate in breach of its agreement and resulting in reductions to grant funding or other financial penalties.	The Applicant notes this comment and is committed to working collaboratively with landowners. The Applicant is continuing to engage with the respondent's land agent regarding their feedback and comments. The Applicant met with the respondent's land agent on 10 November 2026 to progress discussions. Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-154	Landowner engagement	Land plots 09-002 Impacts of DCO: during construction The land forms part of established game cover used in connection with the Estate's shooting operations. Construction activities, increased vehicle movements and the loss or disturbance of habitat are likely to disrupt the shoot and could result in economic losses to the Estate.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design.

Reference	Theme	Issue raised	The Applicant's response
			The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-155	Land use and agriculture	Land plots 09-002 Impacts of DCO: during construction The works are likely to disrupt agricultural operations, potentially affecting crop production and resulting in reduced harvest yields and associated financial losses.	Please refer to the Applicant's response to RR-259-27.
RR-259-156	Landowner engagement	Land plots 09-002 Impacts of DCO: during operation The affected land forms part of the Estate's game cover activities would restrict the Estate's ability to utilise the land for shooting purposes, resulting in disruption to established sporting operations.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. Where access is required in the future for routine maintenance or repair, the Applicant will give reasonable notice of the intention to carry out the works. This notice period will normally be at least 7 days, unless a shorter period is agreed or it is an emergency.
RR-259-157	Land use and agriculture	Land plots 09-002 Impacts of DCO: during operation The proposed works may give rise to economic losses through the temporary or permanent loss of land use. In particular, there is potential for the loss of income associated with shooting activities and the reduction or loss of SFI payments if the works prevent the Estate from complying with the requirements of existing environmental land management agreements.	Please refer to the Applicant's response to RR-259-75.
RR-259-158	Terrestrial and freshwater biodiversity	Land plots 09-002 Impacts of DCO: during operation Disruption to woodland would also reduce the natural cover available to birds and bird pens, which would have a detrimental effect on the shoot.	The Applicant recognises the importance to the respondent of retaining local woodland habitat. As set out in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) and in the Outline Landscape Environment Management Plan (LEMP) (Document reference 7.5, DCO Volume 7, Version 1), primary measures implemented for the Project include the avoidance of habitats where practicable (including woodland) and reinstatement of vegetation removed following construction. These have been incorporated within the design of the Project. The majority of land within the

Reference	Theme	Issue raised	The Applicant's response
			construction area on Southwick Estate comprising arable fields and woodland blocks have been avoided, it is therefore considered the natural cover available to birds in Southwick Estate (and therefore the shoot) will not be impacted. Tertiary measures relating to avoiding and reducing environmental effects during construction are set out in the Outline CEMP – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1). These measures will avoid damage to retained existing habitats including woodland.
RR-259-159	Land use and agriculture	Land plots 09-003 Impacts of DCO: now Temporary road closures associated with surveys could adversely affect tenants, restrict access, disrupt agricultural practices, and interfere with planned shooting and other estate activities. There is currently little disturbance.	Please refer to the Applicant's response to RR-259-37.
RR-259-160	Land use and agriculture	Land plots 09-003 Impacts of DCO: during construction A road closure would cause disruption to agricultural operations. The significance of this impact would depend on the time of year, but if it were to occur during the spring or summer months, it is likely to interfere with key farming activities and essential maintenance operations, potentially resulting in delays and reduced operational efficiency.	Please refer to the Applicant's response to RR-259-122.
RR-259-161	Land use and agriculture	Land plots 09-003 Impacts of DCO: during operation Any disturbance may have a consequential negative impact on the shoot.	Please refer to the Applicant's response to RR-259-127.
RR-259-162	Landowner engagement	Land plots 09-004 Impacts of DCO: now Can cause disturbance to both residential and commercial tenants, agricultural practice and shoot for surveys etc. Survey works undertaken on the Estate have resulted in disturbance to game cover areas, which has adversely affected the operation and management of the shoot.	The Applicant has endeavoured and will continue to mitigate the impact of its survey programmes on landowners. The Applicant undertook a comprehensive set of surveys in 2023, 2024 and 2025 to inform the Environmental Impact Assessment. Landowners were notified in advance of survey visits and whilst the Applicant intended to undertake surveys as per the planned programme of works, circumstances arose that required changes to be made to the timings. For example, adverse weather conditions resulted in last-minute changes and a need for additional and supplementary survey requirements arose following observations made during surveys undertaken. All surveys were undertaken at the appropriate time of year, with seasonal ecological surveys undertaken during the appropriate seasons which resulted in multiple visits to the same holdings. However, the Applicant endeavoured to consolidate survey visits

Reference	Theme	Issue raised	The Applicant's response
			where possible to reduce multiple visits by different survey teams to the same land. A comprehensive set of survey data is necessary to inform the Environmental Impact Assessment and ensure the land impacted by the Project is fully understood and appropriately mitigated. The Applicant considers the volume of survey activity to have been proportionate in order to provide a robust assessment. Where possible, access for surveys was agreed with landowners via voluntary access licences. An upfront payment was made to reflect any potential losses suffered as a result of the survey works, but landowners were able to make a claim if losses exceeded that initial payment. The Applicant will continue to engage with affected parties to seek to agree access where required by voluntary agreement where possible and aims to minimise disturbance to existing land uses as far as reasonably practicable.
RR-259-163	Landowner engagement	Land plots 09-004 Impacts of DCO: now The pipeline also makes it difficult to plan SFI, environmental schemes, cropping rotations and potential diversification (i.e. drives and game covers) and hedge and tree planting.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement, and the respondent can continue with the current farming operations. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions. Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-164	Landowner engagement	Land plots 09-004 Impacts of DCO: during construction A compound will not comply with SFI requirements which could be a breach of the agreement, and the Estate may fail to receive grant funding.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design.

Reference	Theme	Issue raised	The Applicant's response
			Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-165	Landowner engagement	Land plots 09-004 Impacts of DCO: during construction A compound is very close to a game cover which will significantly impact this drive which may have a negative economic impact on the shoot.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-166	Terrestrial and freshwater biodiversity	Land plots 09-004 Impacts of DCO: during construction Close to areas of woodland which could cause ecological disturbance and disturbance to the birds natural habitat which will affect the success of the shoot.	The Applicant recognises the importance of avoiding disturbance to fauna in habitats adjacent to construction. Tertiary measures relating to avoiding and reducing environmental effects, including measures to reduce noise and vibration impacts as well as lighting during construction are set out in the Outline CEMP – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1).
RR-259-167	Land use and agriculture	Land plots 09-004 Impacts of DCO: during construction The works are likely to disrupt agricultural operations, potentially affecting crop production and resulting in reduced harvest yields and associated financial losses.	Please refer to the Applicant's response to RR-259-27.
RR-259-168	Landowner engagement	Land plots 09-004 Impacts of DCO: during operation The affected land forms part of the Estate's game cover activities would restrict the Estate's ability to utilise the land for shooting purposes, resulting in disruption to established sporting operations even if the compound is a temporary addition to the land. This could also damage the Estate's shooting reputation.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. Where access is required in the

Reference	Theme	Issue raised	The Applicant's response
			future for routine maintenance or repair, the Applicant will give reasonable notice of the intention to carry out the works. This notice period will normally be at least 7 days, unless a shorter period is agreed or it is an emergency.
RR-259-169	Land use and agriculture	Land plots 09-004 Impacts of DCO: during operation The proposed works may give rise to economic losses through the temporary or permanent loss of land use. In particular, there is potential for the loss of income associated with shooting activities and the reduction or loss of SFI payments if the works prevent the Estate from complying with the requirements of existing environmental land management agreements.	Please refer to the Applicant's response to RR-259-75.
RR-259-170	Terrestrial and freshwater biodiversity	Land plots 09-004 Impacts of DCO: during operation Disruption to woodland would also reduce the natural cover available to birds and bird pens, which would have a detrimental effect on the shoot.	The Applicant recognises the importance of retaining local woodland habitat to the respondent. As set out in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) and in the Outline Landscape Environment Management Plan (LEMP; Document reference 7.5, DCO Volume 7, Version 1), primary measures implemented for the Project include the avoidance of habitats where practicable (including woodland) and reinstatement of vegetation removed following construction. These have been incorporated within the design of the Project. The majority of land within the construction area on Southwick Estate comprises arable fields, it is therefore considered the natural cover available to birds in Southwick Estate (and therefore the shoot) will not be impacted. Tertiary measures relating to avoiding and reducing environmental effects during construction are set out in the Outline – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1). These measures will avoid damage to retained existing habitats including woodland.
RR-259-171	Landowner engagement	Land plots 09-005 Impacts of DCO: now Can cause disturbance to both residential and commercial tenants, agricultural practice and shoot for surveys etc. Survey works undertaken on the Estate have resulted in disturbance to game cover areas, which has adversely affected the operation and management of the shoot.	The Applicant has endeavoured and will continue to mitigate the impact of its survey programmes on landowners. The Applicant undertook a comprehensive set of surveys in 2023, 2024 and 2025 to inform the Environmental Impact Assessment. Landowners were notified in advance of survey visits and whilst the Applicant intended to undertake surveys as per the planned programme of works, circumstances arose that required changes to be made to the timings. For example, adverse weather conditions resulted in last-minute changes and a need for additional and supplementary survey requirements arose following observations made during surveys undertaken. All surveys were undertaken at the appropriate time of year, with seasonal ecological surveys undertaken during the appropriate seasons which resulted in multiple visits to the same holdings. However, the Applicant endeavoured to consolidate survey visits where possible to reduce multiple visits by different survey teams to the same land.

Reference	Theme	Issue raised	The Applicant's response
			A comprehensive set of survey data is necessary to inform the Environmental Impact Assessment and ensure the land impacted by the Project is fully understood and appropriately mitigated. The Applicant considers the volume of survey activity to have been proportionate in order to provide a robust assessment. Where possible, access for surveys was agreed with landowners via voluntary access licences. An upfront payment was made to reflect any potential losses suffered as a result of the survey works, but landowners were able to make a claim if losses exceeded that initial payment. The Applicant will continue to engage with affected parties to seek to agree access where required by voluntary agreement where possible and aims to minimise disturbance to existing land uses as far as reasonably practicable.
RR-259-172	Landowner engagement	Land plots 09-005 Impacts of DCO: now The pipeline also makes it difficult to plan SFI, environmental schemes, cropping rotations and potential diversification (i.e. drives and game covers) and hedge and tree planting.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming operations. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions. Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-173	Landowner engagement	Land plots 09-005 Impacts of DCO: during construction A compound will not comply with SFI requirements which could be a breach of the agreement, and the Estate may fail to receive grant funding.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to

Reference	Theme	Issue raised	The Applicant's response
			circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-174	Landowner engagement	Land plots 09-005 Impacts of DCO: during construction A compound is very close to a game cover which will significantly impact this drive which may have a negative economic impact on the shoot.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-175	Terrestrial and freshwater biodiversity	Land plots 09-005 Impacts of DCO: during construction Close to areas of woodland which could cause ecological disturbance.	The Applicant recognises the importance of avoiding disturbance to fauna in habitats adjacent to construction. Tertiary measures relating to avoiding and reducing environmental effects, including measures to reduce noise and vibration impacts, during construction are set out in the Outline CEMP – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1).
RR-259-176	Land use and agriculture	Land plots 09-005 Impacts of DCO: during construction The works are likely to disrupt agricultural operations, potentially affecting crop production and resulting in reduced harvest yields and associated financial losses.	Please refer to the Applicant's response to RR-259-27.
RR-259-177	Landowner engagement	Land plots 09-005 Impacts of DCO: during operation The affected land forms part of the Estate's game cover activities would restrict the Estate's ability to utilise the land for shooting purposes, resulting in disruption to established sporting operations even if the compound is a temporary addition to the land. This could also damage the Estate's shooting reputation.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. Where access is required in the future for routine maintenance or repair, the Applicant will give reasonable notice of the intention to carry out the works. This notice period will normally be at least 7 days, unless a shorter period is agreed or it is an emergency.

Reference	Theme	Issue raised	The Applicant's response
RR-259-178	Land use and agriculture	Land plots 09-005 Impacts of DCO: during operation The proposed works may give rise to economic losses through the temporary or permanent loss of land use. In particular, there is potential for the loss of income associated with shooting activities and the reduction or loss of SFI payments if the works prevent the Estate from complying with the requirements of existing environmental land management agreements.	Please refer to the Applicant's response to RR-259-75.
RR-259-179	Landowner engagement	Land plots 09-006 Impacts of DCO: now Survey works undertaken on the Estate have resulted in disturbance to game cover areas, which has adversely affected the operation and management of the shoot.	The Applicant has endeavoured and will continue to mitigate the impact of its survey programmes on landowners. The Applicant undertook a comprehensive set of surveys in 2023, 2024 and 2025 to inform the Environmental Impact Assessment. Landowners were notified in advance of survey visits and whilst the Applicant intended to undertake surveys as per the planned programme of works, circumstances arose that required changes to be made to the timings. For example, adverse weather conditions resulted in last-minute changes and a need for additional and supplementary survey requirements arose following observations made during surveys undertaken. All surveys were undertaken at the appropriate time of year, with seasonal ecological surveys undertaken during the appropriate seasons which resulted in multiple visits to the same holdings. However, the Applicant endeavoured to consolidate survey visits where possible to reduce multiple visits by different survey teams to the same land. A comprehensive set of survey data is necessary to inform the Environmental Impact Assessment and ensure the land impacted by the Project is fully understood and appropriately mitigated. The Applicant considers the volume of survey activity to have been proportionate in order to provide a robust assessment. Where possible, access for surveys was agreed with landowners via voluntary access licences. An upfront payment was made to reflect any potential losses suffered as a result of the survey works, but landowners were able to make a claim if losses exceeded that initial payment. The Applicant will continue to engage with affected parties to seek to agree access where required by voluntary agreement where possible and aims to minimise disturbance to existing land uses as far as reasonably practicable.
RR-259-180	Landowner engagement	Land plots 09-006 Impacts of DCO: now The pipeline also makes it difficult to plan SFI, environmental schemes, cropping rotations and potential diversification, future plans for the shoot (i.e. drives and game covers) and hedge and tree planting.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further

Reference	Theme	Issue raised	The Applicant's response
			into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming operations. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions. Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-181	Noise and vibration	Land plots 09-006 Impacts of DCO: during construction There will be noise and dust which will cause disturbance to the both the nearby buy commercial and residential tenants.	The construction phase noise and vibration impacts of the Project have been assessed, as reported in ES Chapter 15 Noise and vibration [APP-094]. The nearest NVSR to land plot 09-002 is R161, to the north-west. This dwelling will be mainly affected by construction noise associated with the short-term works (<4-weeks), associated with the 'Pipeline –Construction' stage. As a minimum all construction noise impacts/effects would be mitigated through the implementation of BPM with additional noise and vibration mitigation measures where required. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) provides potential mitigation options, the final package of noise mitigation will be identified in a Noise and Vibration Management Plan to be submitted to each local planning authority for approval prior to commencement of construction. Consequently, no significant construction noise and/or vibration impacts/effects would result. The Applicant has assessed the potential impacts of construction dust and particulate matter emissions within section 6.8 of ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1). Commensurate controls are detailed within environmental measures AQ1 to AQ18 as outlined in Table 5-1 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). With the implementation of mitigation measures commensurate to the highest level of risk assessed, the effect of construction dust and particulate matter emissions from the Project is considered to be not significant.
RR-259-182	Landowner engagement	Land plots 09-006 Impacts of DCO: during construction	The Applicant notes this comment and is committed to working collaboratively with landowners. The Applicant is continuing to engage with the respondent's

Reference	Theme	Issue raised	The Applicant's response
		The land is currently managed under a SFI agreement. Temporary or permanent disruption to the land resulting from the proposed works may prevent the Estate from meeting the requirements of the scheme, potentially placing the Estate in breach of its agreement and resulting in reductions to grant funding or other financial penalties.	land agent regarding their feedback and comments. The Applicant met with the respondent's land agent on 10 November 2026 to progress discussions. Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-183	Landowner engagement	Land plots 09-006 Impacts of DCO: during construction The land forms part of established game cover used in connection with the Estate's shooting operations. Construction activities, increased vehicle movements and the loss or disturbance of habitat are likely to disrupt the shoot and could result in economic losses to the Estate.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-184	Land use and agriculture	Land plots 09-006 Impacts of DCO: during construction The works are likely to disrupt agricultural operations, potentially affecting crop production and resulting in reduced harvest yields and associated financial losses.	Please refer to the Applicant's response to RR-259-27.
RR-259-185	Landowner engagement	Land plots 09-006 Impacts of DCO: during operation The affected land forms part of the Estate's game cover activities would restrict the Estate's ability to utilise the land for shooting purposes, resulting in disruption to established sporting operations.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. Where access is required in the future for routine maintenance or repair, the Applicant will give reasonable notice of the intention to carry out the works. This notice period will normally be at least 7 days, unless a shorter period is agreed or it is an emergency.

Reference	Theme	Issue raised	The Applicant's response
RR-259-186	Land use and agriculture	Land plots 09-006 Impacts of DCO: during operation The proposed works may give rise to economic losses through the temporary or permanent loss of land use. In particular, there is potential for the loss of income associated with shooting activities and the reduction or loss of SFI payments if the works prevent the Estate from complying with the requirements of existing environmental land management agreements.	Please refer to the Applicant's response to RR-259-75.
RR-259-187	Landowner engagement	Land plots 09-007 Impacts of DCO: now The pipeline also makes it difficult to plan SFI, environmental schemes, cropping rotations and potential diversification, future plans for the shoot (i.e. drives and game covers) and hedge and tree planting.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming operations. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions. Where land is managed under Sustainable Farming Incentive (SFI) agreements, the "Good Reasons" clause will protect the landowner from penalties or payment repayments if they breach the agreement terms due to circumstances outside of their control. Where SFI income is lost, the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-188	Land use and agriculture	Land plots 09-007 Impacts of DCO: during construction The works are likely to disrupt agricultural operations, potentially affecting crop production and resulting in reduced harvest yields and associated financial losses.	Please refer to the Applicant's response to RR-259-27.
RR-259-189	Land use and agriculture	Land plots 09-007 Impacts of DCO: during operation There could be long-term impacts on surrounding agricultural land through soil compaction, erosion, altered drainage, and potential contamination, which could reduce soil quality which will also result in financial losses.	The Applicant acknowledges the concern regarding potential long-term effects on agricultural land quality and productivity. Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091] assesses the effects of the Project on agricultural land holdings, agricultural activities and land use receptors, including the permanent and temporary effects of the Project on agricultural land. The assessment includes

Reference	Theme	Issue raised	The Applicant's response
			consideration of the long-term condition and use of agricultural land following construction and reinstatement. Effects on agricultural land and agricultural land use during the operation of the Project are scoped out of the assessment as any significant effects are anticipated to occur during construction. Chapter 12 Land use and agriculture acknowledges that significant temporary and permanent adverse effects are anticipated for Grade 2 quality agricultural land during construction, with other grades subject to minor or negligible adverse effects. Effects on soils during construction are concluded to be neutral, with management plans in effect. The Outline Soil Resources Management Plan (SRMP), included as Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), sets out measures for soil stripping, handling, storage and reinstatement to minimise the risk of soil compaction and degradation. The detailed SRMP(s) will be prepared and implemented by the Contractor in accordance with the Outline SRMP to facilitate the restoration of agricultural land following construction. Measures to manage drainage, runoff, sediment movement and pollution are also included within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and are intended to minimise the risk of indirect effects on surrounding agricultural land. These measures are contained within the Outline CEMP and secured through the relevant requirement of the draft DCO [APP-023]. The Applicant therefore considers that appropriate measures are in place to restore agricultural land following construction and to minimise the potential for long-term adverse effects on surrounding agricultural land quality and productivity. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-190	Landowner engagement	Land plots 09-007 (plot also identified on sheet 10 of 30) Impacts of DCO: now Land is subject to an AHA and the proposed DCO may create uncertainty for the tenant and could adversely affect ongoing agricultural management and investment decisions.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns regarding uncertainty and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming operations. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions.

Reference	Theme	Issue raised	The Applicant's response
RR-259-191	Location of the proposed pipeline routes	Land plots 09-007 (plot also identified on sheet 10 of 30) Impacts of DCO: now The pipeline proposal affects the Estate's shoot planned drives, routes and game covers.	Please refer to the Applicant's response to RR-259-190.
RR-259-192	Land use and agriculture	Land plots 09-007 (plot also identified on sheet 10 of 30) Impacts of DCO: during construction Construction activities are likely to cause disturbance to the agricultural tenant, resulting in crop loss, loss of crop establishment costs, reduced yields, and additional costs associated with reinstatement and re-establishment of farming operations.	Please refer to the Applicant's response to RR-259-27.
RR-259-193	Noise and vibration	Land plots 09-007 (plot also identified on sheet 10 of 30) Impacts of DCO: during construction There will be noise and dust which will cause disturbance to the residential tenants close by.	The construction phase noise and vibration impacts of the Project have been assessed, as reported in ES Chapter 15 Noise and vibration [APP-094]. The nearest NVSR to land plot 09-007 is R30, to the north-west. This dwelling will be mainly affected by construction noise associated with the short-term works (<4-weeks), associated with the 'Pipeline –Construction' stage. As a minimum, all construction noise impacts/effects would be mitigated through the implementation of Best Practicable Means with additional noise and vibration mitigation measures where required; consequently, no significant effects would result. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) provides potential mitigation options, the final package of noise mitigation will be identified in a Noise and Vibration Management Plan to be submitted to each local planning authority for approval prior to commencement of construction. Consequently, no significant construction noise and/or vibration impacts/effects would result. The Applicant has assessed the likely significant effects of construction dust and particulate matter and odour emissions within section 6.8 of ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1). Commensurate controls are detailed within the measures AQ1 to AQ18 as outlined in Table 5-1 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). With the implementation of mitigation measures commensurate to the highest level of risk assessed, the effect of construction dust and particulate matter emissions from the Project is considered to be not significant.
RR-259-194	Land use and agriculture	Land plots 09-007 (plot also identified on sheet 10 of 30) Impacts of DCO: during operation The DCO may continue to affect the tenant's productivity and ability to farm the land effectively. If the land is returned to the Estate, operational restrictions	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable.

Reference	Theme	Issue raised	The Applicant's response
		may also limit the Estate's future use of the land and negatively. affect the viability and success of agricultural or alternative land uses.	Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. Affected landowners and occupiers will be notified and engaged in advance of relevant construction activities.
RR-259-195	Land use and agriculture	Drawing reference (APP-010)23008233_PLN_LAND_10 Land Plan number Sheet 10 of 30 Land plots 10-001 Impacts of DCO: now Temporary road closures associated with surveys could adversely affect tenants, restrict access, disrupt agricultural practices, and interfere with planned shooting and other estate activities. There is currently little disturbance.	Please refer to the Applicant's response to RR-259-37.
RR-259-196	Land use and agriculture	Land plots 10-001 Impacts of DCO: during construction A road closure would cause disruption to agricultural operations. The significance of this impact would depend on the time of year, but if it were to occur during the spring or summer months, it is likely to interfere with key farming activities and essential maintenance operations, potentially resulting in delays and reduced operational efficiency. This will also affect the farming and residential tenants who live on the road of this road closure. This may also disturb the operation of the shoot.	Please refer to the Applicant's response to RR-259-122.
RR-259-197	Land use and agriculture	Land plots 10-001 Impacts of DCO: during operation Road closures may necessitate changes to farming operations, including alterations to crop rotations and delays to planned tree and hedge planting, where access to land is restricted because of the closures.	The Applicant acknowledges the concern regarding potential changes to farming operations arising from access restrictions associated with the operation and maintenance of the Project. Any maintenance activities would be infrequent and temporary in nature and are not anticipated to result in significant effects on agricultural operations Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091] concludes that direct impacts on agricultural land during operation are scoped out because the pipeline would be buried and normal agricultural operations can continue above the pipeline following reinstatement. The protective strip associated with the pipeline does not restrict normal agricultural operations and would not permanently remove land from agricultural use.

Reference	Theme	Issue raised	The Applicant's response
			ES Chapter 18 Traffic and Transport [APP-097] confirms that driver delay, severance, accidents and safety effects during operation are scoped out, as operational traffic associated with the Project would not materially affect the local highway network. Infrequent operational and maintenance traffic is not considered likely to result in significant transport impacts.
RR-259-198	Landowner engagement	Land plots 10-001 Impacts of DCO: during operation Disturbance may also affect the reputation of the shoot.	Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. Where access is required in the future for routine maintenance or repair, the Applicant will give reasonable notice of the intention to carry out the works. This notice period will normally be at least 7 days, unless a shorter period is agreed or it is an emergency. The Applicant confirms that compensation will be paid for any reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-199	Landowner engagement	Land plots 10-002 Impacts of DCO: now Land is subject to an AHA and the proposed DCO may create uncertainty for the tenant and could adversely affect ongoing agricultural management and investment decisions.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns regarding uncertainty and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming operations. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions.
RR-259-200	Location of the proposed pipeline routes	Land plots 10-002 Impacts of DCO: now The pipeline proposal affects the Estate's shoot planned drives, routes and game covers.	Please refer to the Applicant's response to RR-259-199.
RR-259-201	Land use and agriculture	Land plots 10-002 Impacts of DCO: during construction	Please refer to the Applicant's response to RR-259-27.

Reference	Theme	Issue raised	The Applicant's response
		Construction activities are likely to cause disturbance to the agricultural tenant, resulting in crop loss, loss of crop establishment costs, reduced yields, and additional costs associated with reinstatement and re-establishment of farming operations.	
RR-259-202	Noise and vibration	Land plots 10-002 Impacts of DCO: during construction There will be noise and dust which will cause disturbance to the residential tenants close by.	The construction phase noise and vibration impacts of the Project have been assessed, as reported in ES Chapter 15 [APP-094]. The nearest NVSR to land plots 10-002 is R30 to the north. This dwelling will be mainly affected by construction noise associated with the short-term works (<4-weeks), associated with the 'Pipeline –Construction' stage. As a minimum all construction noise impacts/effects would be mitigated through the implementation of Best Practicable Means with additional noise and vibration mitigation measures where required. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) provides potential mitigation options, the final package of noise mitigation will be identified in a Noise and Vibration Management Plan to be submitted to each local planning authority for approval prior to commencement of construction. Consequently, no significant construction noise and/or vibration impacts/effects would result. The Applicant has assessed the potential impacts of construction dust and particulate matter and odour emissions within section 6.8 of ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1). Commensurate controls are detailed within measures AQ1 to AQ18 as outlined in Table 5-1 in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). With the implementation of mitigation measures commensurate to the highest level of risk assessed, the effect of construction dust and particulate matter emissions from the Project is considered to be not significant.
RR-259-203	Landowner engagement	Land plots 10-002 Impacts of DCO: during construction Any proposed changes to the footpath will cause further disruption to the tenant and will again effect agricultural operations.	Please refer to the Applicant's response to RR-259-29.
RR-259-204	Land use and agriculture	Land plots 10-002 Impacts of DCO: during operation The DCO may continue to affect the tenant's productivity and ability to farm the land effectively. If the land is returned to the Estate, operational restrictions may also limit the Estate's future use of the land and negatively. affect the viability and success of agricultural or alternative land uses.	Please refer to the Applicant's response to RR-259-27.

Reference	Theme	Issue raised	The Applicant's response
RR-259-205	Landowner engagement	Land plots 10-003 Impacts of DCO: now Land is subject to an AHA and the proposed DCO may create uncertainty for the tenant and could adversely affect ongoing agricultural management and investment decisions.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns regarding uncertainty and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming operations. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions.
RR-259-206	Location of the proposed pipeline routes	Land plots 10-003 Impacts of DCO: now The pipeline proposal affects the Estate's shoot planned drives, routes and game covers.	Please refer to the Applicant's response to RR-259-205.
RR-259-207	Location of the proposed pipeline routes	Land plots 10-003 Impacts of DCO: during construction The pipeline proposal affects the Estate's shoot planned drives, routes and game covers.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (APP-412) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming operations. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-208	Land use and agriculture	Land plots 10-003 Impacts of DCO: during construction Construction activities are likely to cause disturbance to the agricultural tenant, resulting in crop loss, loss of crop establishment costs, reduced yields, and additional costs associated with reinstatement and re-establishment of farming operations.	Please refer to the Applicant's response to RR-259-27.

Reference	Theme	Issue raised	The Applicant's response
RR-259-209	Noise and vibration	Land plots 10-003 Impacts of DCO: during construction There will be noise and dust which will cause disturbance to the tenant and additional costs associated with reinstatement and re-establishment of farming operations.	The construction phase noise and vibration impacts of the Project have been assessed, as reported in ES Chapter 15 [APP-094]. The nearest NVSR to land plot 10-003 is R31, to the north. This dwelling will be mainly affected by construction noise associated with the short-term works (<4-weeks), associated with the 'Pipeline –Construction' stage. As a minimum all construction noise impacts/effects would be mitigated through the implementation of BPM with additional noise and vibration mitigation measures where required. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) provides potential mitigation options, the final package of noise mitigation will be identified in a Noise and Vibration Management Plan to be submitted to each local planning authority for approval prior to commencement of construction. Consequently, no significant construction noise and/or vibration impacts/effects would result. The Applicant has assessed the potential impacts of construction dust and particulate matter and odour emissions within section 6.8 of ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1). Commensurate controls are detailed within measures AQ1 to AQ18 as outlined in Table 5-1 in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). With the implementation of mitigation measures commensurate to the highest level of risk assessed, the effect of construction dust and particulate matter emissions from the Project is considered to be not significant. The Outline SRMP provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) notes that reinstatement of soils over the pipeline will be undertaken as soon as practicable after installation, and that the timing and management of reinstatement will be agreed with the landowner. Disruption to agricultural land and agricultural workings will be minimised.
RR-259-210	Land use and agriculture	Land plots 10-003 Impacts of DCO: during construction Any proposed changes to the footpath will cause further disruption to the tenant and will again effect agricultural operations.	Please refer to the Applicant's response to RR-259-29.
RR-259-211	Land use and agriculture	Land plots 10-003 Impacts of DCO: during operation The DCO may continue to affect the tenant's productivity and ability to farm the land effectively as it will take a long period of time to reestablish the compound site. If the land is returned to the Estate, operational restrictions may also limit the Estate's future use of the land and negatively. affect the viability and success of agricultural or alternative land uses.	Please refer to the Applicant's response to RR-259-27.

Reference	Theme	Issue raised	The Applicant's response
RR-259-212	Landowner engagement	Land plots 10-004 Impacts of DCO: now Disturbance to both the Estate and tenant whilst completing surveys.	The Applicant has endeavoured and will continue to mitigate the impact of its survey programmes on landowners. The Applicant undertook a comprehensive set of surveys in 2023, 2024 and 2025 to inform the Environmental Impact Assessment. Landowners were notified in advance of survey visits and whilst the Applicant intended to undertake surveys as per the planned programme of works, circumstances arose that required changes to be made to the timings. For example, adverse weather conditions resulted in last-minute changes and a need for additional and supplementary survey requirements arose following observations made during surveys undertaken. All surveys were undertaken at the appropriate time of year, with seasonal ecological surveys undertaken during the appropriate seasons which resulted in multiple visits to the same holdings. However, the Applicant endeavoured to consolidate survey visits where possible to reduce multiple visits by different survey teams to the same land. A comprehensive set of survey data is necessary to inform the Environmental Impact Assessment and ensure the land impacted by the Project is fully understood and appropriately mitigated. The Applicant considers the volume of survey activity to have been proportionate in order to provide a robust assessment. Where possible, access for surveys was agreed with landowners via voluntary access licences. An upfront payment was made to reflect any potential losses suffered as a result of the survey works, but landowners were able to make a claim if losses exceeded that initial payment. The Applicant will continue to engage with affected parties to seek to agree access where required by voluntary agreement where possible and aims to minimise disturbance to existing land uses as far as reasonably practicable.
RR-259-213	Land use and agriculture	Land plots 10-004 Impacts of DCO: during construction During the works, there may be temporary disruption to farming and estate operations due to restricted access, increased traffic movements, noise, dust, and the presence of construction personnel and equipment. These disturbances could affect the timely undertaking of agricultural activities, woodland management, and planned planting works. This may also cause disturbance to the operation of the shoot.	The Applicant acknowledges this comment. The assessment in ES Chapter 12 Land use and agriculture [APP-091] considers the likely significant effects arising from any temporary or permanent loss of land, and any temporary loss of access or boundary features affecting community land and facilities, commercial properties and land. The assessment reported in section 12.8 of ES Chapter 12 Land use and agriculture [APP-091] considers temporary and permanent impacts on agricultural land use, including disruption to livestock movements, loss of access or boundary features, disruption to water supplies or drainage systems, disruption to land management agreements and severance of agricultural fields. Paragraph 12.8.20 concludes that, taking account of the short-term and temporary nature of pipeline installation and the measures secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), [APP-413] and [APP-414] for documents 2 and 3, no likely significant effects on ongoing farm viability are anticipated. These measures include maintaining access to farm tracks and providing private farm access

Reference	Theme	Issue raised	The Applicant's response
			across the open-cut pipeline during construction, as required and where feasible, to mitigate field severance, together with ongoing discussion and negotiation with affected landowners and occupiers during detailed design and construction planning to identify opportunities to minimise disruption to farming activities, estate operations and other land management activities, where reasonably practicable. ES Chapter 12 Land use and agriculture [APP-091] concludes that, given the short term and temporary nature of the pipeline installation and the measures contained within the Outline CEMP, no likely significant effects arising from ongoing farm viability issues are anticipated. The construction phase noise and vibration impacts of the Project have been assessed, as reported in ES Chapter 15 Noise and vibration [APP-094]. As a minimum all construction noise impacts/effects would be mitigated through the implementation of Best Practicable Means (BPM) with additional noise and vibration mitigation measures where required. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), [APP-413] and [APP-414] for documents 2 and 3 Document reference 7.1, DCO Volume 7, Version 1) provides potential mitigation options, the final package of noise mitigation will be identified in a Noise and Vibration Management Plan to be submitted to each local planning authority for approval prior to commencement of construction. Consequently, no significant construction noise and/or vibration impacts/effects would result. The Applicant has assessed the potential impacts of construction dust and particulate matter and odour emissions within section 6.8 of ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1). Commensurate controls are detailed within environmental measures AQ1 to AQ18 as outlined in Table 5-1 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). With the implementation of mitigation measures commensurate to the highest level of risk assessed, the effect of construction dust and particulate matter emissions from the Project is considered not significant. In addition, a Framework Construction Traffic Management Plan (CTMP) [APP-415] has been prepared and submitted as part of the DCO application. The Framework CTMP provides details of the routes designated for use by construction vehicles travelling to and from the various components of the Project, helping to manage construction traffic and minimise disruption during construction. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss. The Applicant confirms that affected landowners and occupiers will be notified and engaged in advance of relevant construction activities, in accordance with the commitments contained within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). Section 4.8 requires

Reference	Theme	Issue raised	The Applicant's response
			affected communities and other relevant stakeholders to be notified prior to the commencement of potentially disruptive construction activities, including information on the nature and timing of the works. In addition, the Outline SRMP appended to the Outline CEMP provides for pre-construction liaison with landowners, occupiers and their agents, through the Agricultural Liaison Officer, to reduce disruption, where practicable, to existing farming regimes and the timing of activities.
RR-259-214	Landscape and visual	Land plots 10-004 Impacts of DCO: during operation The removal of a small area of roadside woodland may result in the loss of established trees and habitat, reduce landscape screening, and affect the management and long-term value of the woodland. This would be costly and timely to replace.	The Applicant acknowledges the concern regarding the potential loss of woodland and associated effects on landscape character, visual screening and habitat value on Boarhunt Road. The extent of tree, woodland and hedgerow loss associated with the Project is identified and assessed within Environmental Statement (ES) Appendix 13.5 Arboricultural Impact Assessment [APP-175 and APP-176 – 2 documents], which forms the basis of the assessment of landscape and visual effects reported in ES Chapter 13 Landscape and visual [APP-092]. The Project has been designed to avoid and minimise impacts on trees, woodland, hedgerows and other vegetation wherever reasonably practicable through the iterative design process. Measures include route refinement, reduced working widths, trenchless construction techniques and the retention of existing vegetation where practicable. In relation to the roadside woodland on Boarhunt Road, identified within ES Appendix 13.5 Arboricultural Impact Assessment [APP-175 and APP-176 – 2 documents], as Tree Group G281, the Project has sought to minimise impacts through the design process. Measures include reducing the working width to approximately 20m in the vicinity of the woodland, refining the route alignment to utilise existing gaps in vegetation where practicable, and selecting a crossing location that minimises the extent of vegetation removal required. As a result, only partial removal of the tree group is required. Where vegetation removal cannot be avoided, replacement planting, landscape reinstatement and long-term management would be secured through the Outline Landscape and Ecology Management Plan (LEMP) (Document reference 7.5, DCO Volume 7, Version 1). The Outline LEMP establishes the framework for mitigation, management and monitoring, including replacement planting designed to respond to the type and character of vegetation lost and support long-term landscape integration. While replacement planting would take time to establish, the Outline LEMP (Document reference 7.5, DCO Volume 7, Version 1) includes provisions for implementation, management and monitoring to ensure that mitigation planting successfully establishes and achieves its intended landscape and ecological functions.
RR-259-215	Landowner engagement	Land plots 10-004 Impacts of DCO: during operation	Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP 1 of 3 documents (Document

Reference	Theme	Issue raised	The Applicant's response
		Interruptions to the shoot may affect the shoots reputation.	reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. Where access is required in the future for routine maintenance or repair, the Applicant will give reasonable notice of the intention to carry out the works. This notice period will normally be at least 7 days, unless a shorter period is agreed or it is an emergency. The Applicant confirms that compensation will be paid for any reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-216	Landowner engagement	Land plots 10-005 Impacts of DCO: now Disturbance to both the Estate and tenant whilst completing surveys.	The Applicant has endeavoured and will continue to mitigate the impact of its survey programmes on landowners. The Applicant undertook a comprehensive set of surveys in 2023, 2024 and 2025 to inform the Environmental Impact Assessment. Landowners were notified in advance of survey visits and whilst the Applicant intended to undertake surveys as per the planned programme of works, circumstances arose that required changes to be made to the timings. For example, adverse weather conditions resulted in last-minute changes and a need for additional and supplementary survey requirements arose following observations made during surveys undertaken. All surveys were undertaken at the appropriate time of year, with seasonal ecological surveys undertaken during the appropriate seasons which resulted in multiple visits to the same holdings. However, the Applicant endeavoured to consolidate survey visits where possible to reduce multiple visits by different survey teams to the same land. A comprehensive set of survey data is necessary to inform the Environmental Impact Assessment and ensure the land impacted by the Project is fully understood and appropriately mitigated. The Applicant considers the volume of survey activity to have been proportionate in order to provide a robust assessment. Where possible, access for surveys was agreed with landowners via voluntary access licences. An upfront payment was made to reflect any potential losses suffered as a result of the survey works, but landowners were able to make a claim if losses exceeded that initial payment. The Applicant will continue to engage with affected parties to seek to agree access where required by voluntary agreement where possible and aims to minimise disturbance to existing land uses as far as reasonably practicable.
RR-259-217	Land use and agriculture	Land plots 10-005 Impacts of DCO: during construction	Please refer to the Applicant's response to RR-259-213.

Reference	Theme	Issue raised	The Applicant's response
		During the works, there may be temporary disruption to farming and estate operations due to restricted access, increased traffic movements, noise, dust, and the presence of construction personnel and equipment. These disturbances could affect the timely undertaking of agricultural activities, woodland management, and planned planting works.	
RR-259-218	Landowner engagement	Land plots 10-005 Impacts of DCO: during construction Interruptions to the shoot may affect the shoots reputation.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-219	Landscape and visual	Land plots 10-005 Impacts of DCO: during operation The removal of a small area of roadside woodland may result in the loss of established trees and habitat, reduce landscape screening, and affect the management and long-term value of the woodland. This would be costly and timely to replace.	Please refer to the Applicant's response to RR-259-214
RR-259-220	Landowner engagement	Land plots 10-005 Impacts of DCO: during operation Interruptions to the shoot may affect to the shoot reputation.	Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. Where access is required in the future for routine maintenance or repair, the Applicant will give reasonable notice of the intention to carry out the works. This notice period will normally be at least 7 days, unless a shorter period is agreed or it is an emergency. The Applicant confirms that compensation will be paid for any reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-221	Land use and agriculture	Land plots 10-006 Impacts of DCO: now Temporary road closures associated with surveys could adversely affect tenants, restrict access, disrupt agricultural practices, and interfere with	Please refer to the Applicant's response to RR-259-37.

Reference	Theme	Issue raised	The Applicant's response
		planned shooting and other estate activities. There is currently little disturbance.	
RR-259-222	Land use and agriculture	Land plots 10-006 Impacts of DCO: during construction A road closure would cause disruption to agricultural operations. The significance of this impact would depend on the time of year, but if it were to occur during the spring or summer months, it is likely to interfere with key farming activities and essential maintenance operations, potentially resulting in delays and reduced operational efficiency. This will also affect the farming and residential tenants who live on the road of this road closure. This will also affect the farming and residential tenants who live on the road of this road closure.	Please refer to the Applicant's response to RR-259-122.
RR-259-223	Land use and agriculture	Land plots 10-006 Impacts of DCO: during operation Road closures may necessitate changes to farming operations, including alterations to crop rotations and delays to planned tree and hedge planting, where access to land is restricted because of the closures.	Please refer to the Applicant's response to RR-259-197.
RR-259-224	Landowner engagement	Land plots 10-007 Impacts of DCO: now As above	Please refer to the Applicant's response to RR-259-216 regarding the Applicant's approach to survey access.
RR-259-225	Landowner engagement	Land plots 10-007 Impacts of DCO: during construction As above	Please refer to the response to RR-259-217 and RR-259-218 and regarding the Applicant's response to the impacts of the DCO during construction.
RR-259-226	Landowner engagement	Land plots 10-007 Impacts of DCO: during operation As above	Please refer to the Applicant's response to RR-259-219 and RR-259-220 regarding the Applicant's response to the impacts of the DCO during operation.
RR-259-227	Landowner engagement	Land plots 10-008 Impacts of DCO: now Land is subject to an AHA tenancy. The proposed DCO may create uncertainty for the tenant and could adversely affect ongoing agricultural management and investment decisions.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns regarding uncertainty and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), and which will be developed further

Reference	Theme	Issue raised	The Applicant's response
			into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement, and the respondent can continue with the current farming operations. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions.
RR-259-228	Location of the proposed pipeline routes	Land plots 10-008 Impacts of DCO: now The pipeline proposal affects the Estate's shoot planned drives, routes and game covers.	Please refer to the Applicant's response to RR-259-227.
RR-259-229	Land use and agriculture	Land plots 10-008 Impacts of DCO: during construction Construction activities are likely to cause disturbance to the agricultural tenant, resulting in crop loss, loss of crop establishment costs, reduced yields, and additional costs associated with reinstatement and re-establishment of farming operations.	Please refer to the Applicant's response to RR-259-27.
RR-259-230	Noise and vibration	Land plots 10-008 Impacts of DCO: during construction There will be noise and dust which will cause disturbance to the tenant and additional costs associated with reinstatement and re-establishment of farming operations.	The construction phase noise and vibration impacts of the Project have been assessed, as reported in ES Chapter 15 Noise and vibration [APP-094]. The nearest NVSR to land plot 10-008 is R31, to the north. This dwelling will be mainly affected by construction noise associated with the short-term works (<4-weeks), associated with the 'Pipeline –Construction' stage. As a minimum all construction noise impacts/effects would be mitigated through the implementation of Best Practicable Means with additional noise and vibration mitigation measures where required. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) provides potential mitigation options, the final package of noise mitigation will be identified in a Noise and Vibration Management Plan to be submitted to each local planning authority for approval prior to commencement of construction. Consequently, no significant construction noise and/or vibration impacts/effects would result. The Applicant has assessed the potential impacts of construction dust and particulate matter emissions within section 6.8 of ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1). Commensurate controls are detailed within measures AQ1 to AQ18 as outlined in Table 5-1 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). With the implementation of mitigation measures commensurate to the highest level of risk assessed, the effect of construction

Reference	Theme	Issue raised	The Applicant's response
			dust and particulate matter emissions from the Project is considered to be not significant. The Outline SRMP provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) notes that reinstatement of soils over the pipeline will be undertaken as soon as practicable after installation, and that the timing and management of reinstatement will be agreed with the landowner. Disruption to agricultural land and agricultural workings will be minimised.
RR-259-231	Land use and agriculture	Land plots 10-008 Impacts of DCO: during construction Any proposed changes to the footpath will cause further disruption to the tenant and will again effect agricultural operations.	Please refer to the Applicant's response to RR-259-29.
RR-259-232	Land use and agriculture	Land plots 10-008 Impacts of DCO: during operation The DCO may continue to affect the tenant's productivity and ability to farm the land effectively as it will take a long period of time to reestablish the compound site. If the land is returned to the Estate, operational restrictions may also limit the Estate's future use of the land and negatively. affect the viability and success of agricultural or alternative land uses.	Please refer to the Applicant's response to RR-259-27.
RR-259-233	Landowner engagement	Land plots 10-009 Impacts of DCO: now Land is subject to an AHA tenancy. The proposed DCO may create uncertainty for the tenant and could adversely affect ongoing agricultural management and investment decisions.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns regarding uncertainty and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming operations. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions.
RR-259-234	Location of the proposed pipeline routes	Land plots 10-009 Impacts of DCO: now The pipeline proposal affects the Estate's shoot planned drives, routes and game covers.	Please refer to the Applicant's response to RR-259-233.

Reference	Theme	Issue raised	The Applicant's response
RR-259-235	Land use and agriculture	Land plots 10-009 Impacts of DCO: during construction Construction activities are likely to cause disturbance to the agricultural tenant, resulting in crop loss, loss of crop establishment costs, reduced yields, and additional costs associated with reinstatement and re-establishment of farming operations.	Please refer to the Applicant's response to RR-259-27.
RR-259-236	Noise and vibration	Land plots 10-009 Impacts of DCO: during construction There will be noise and dust which will cause disturbance to the tenant and additional costs associated with reinstatement and re-establishment of farming operations.	The construction phase noise and vibration impacts of the Project have been assessed, as reported in ES Chapter 15 Noise and vibration [APP-094]. The nearest NVSR to land plot 10-009 is R31, to the north. This dwelling will be mainly affected by construction noise associated with the short-term works (<4-weeks), associated with the 'Pipeline –Construction' stage. As a minimum all construction noise impacts/effects would be mitigated through the implementation of BPM with additional noise and vibration mitigation measures where required. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) provides potential mitigation options, the final package of noise mitigation will be identified in a Noise and Vibration Management Plan to be submitted to each local planning authority for approval prior to commencement of construction. Consequently, no significant construction noise and/or vibration impacts/effects would result. The Applicant has assessed the potential impacts of construction dust and particulate matter emissions within section 6.8 of ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1). Commensurate controls are detailed within measures AQ1 to AQ18 as outline din Table 5-1 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). With the implementation of mitigation measures commensurate to the highest level of risk assessed, the effect of construction dust and particulate matter emissions from the Project is considered to be not significant. The Outline SRMP provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) notes that reinstatement of soils over the pipeline will be undertaken as soon as practicable after installation, and that the timing and management of reinstatement will be agreed with the landowner. Disruption to agricultural land and agricultural workings will be minimised.
RR-259-237	Land use and agriculture	Land plots 10-009 Impacts of DCO: during operation The DCO may continue to affect the tenant's productivity and ability to farm the land effectively. If the land is returned to the Estate, operational restrictions	Please refer to the Applicant's response to RR-259-27.

Reference	Theme	Issue raised	The Applicant's response
		may also limit the Estate's future use of the land and negatively. affect the viability and success of agricultural or alternative land uses.	
RR-259-238	Landowner engagement	Drawing reference (APP-010) 23008223_PLN_LAND_12 Land Plan number Sheet 12 of 30 Land plots 12-004 Impacts of DCO: now The construction and operation of the pipeline have the potential to disrupt commercial tenants and their customers, given that the affected area forms the main access route and car park for Albany Business Centre and the tenants of Albany Farmhouse (residential accommodation for vulnerable adults). The uncertainty surrounding the future effects of the pipeline on tenant retention, occupancy levels, and business activity creates challenges in assessing and projecting future rental income, potentially affecting the property's investment performance.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns regarding uncertainty and agree practical solutions wherever practicable. Please refer to RR-259-13 and RR-259-14 for the Applicant's response to how impacts on Albany Business Centre and Albany Farm Care Home have been assessed. The Project has been designed to maintain access to Albany Business Centre throughout construction and operation. The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1), contains the General Design Principles and Site Specific Design Principles (SSDPs) (together, the 'Design Principles') with which the detailed design of the Project will be required to comply with. Included within the SSDPs for Intermediate Pumping Station F is a commitment to reducing noise and vibration impacts. The detailed design will ensure that operational noise levels at noise sensitive receptors do not exceed the Lowest Observed Adverse Effect Level, as identified in ES Chapter 15 Noise and vibration [APP-094]. Mitigation measures will be adopted according to the following mitigation hierarchy: • Avoidance of noise and vibration • Control of noise and vibration at source • Implement good practice environmental noise management measures • Mitigate the propagation pathway, for example by introducing boundary screening. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions.
RR-259-239	Landowner engagement	Land plots 12-004 Impacts of DCO: during construction The proposed works could result in a loss of rental income to the Estate, as it may be necessary to agree reduced rents or rent-free periods to reflect the significant disturbance arising from the use of the access and the inability to use the parking area due to this being part of the pipeline route.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Please refer to RR-259-13 and RR-259-14 for the Applicant's response to how impacts on Albany Business Centre and Albany Farm Care Home have been assessed. The Project has been designed to maintain access to Albany Business Centre throughout construction and operation. A key mitigation measure is that construction access to IPS-F and the associated construction compounds would utilise a separate temporary construction access from Chalk Lane, rather than routing construction traffic through Albany Business Centre. The Albany Business centre access road is

Reference	Theme	Issue raised	The Applicant's response
			included in the Order Limits as an option for operational vehicles to access IPS-F once a week, once constructed. Construction vehicles would access to IPS-F and the associated construction compounds directly from Chalk Lane to the north of Albany Farm. This is controlled through the Framework Construction Traffic Management Plan (CTMP) [APP-415], the Access and Rights of Way Plans [APP-015] and Schedule 1 to the Draft Development Consent Order [APP-023]]. In addition, the Framework Construction Traffic Management Plan (CTMP) [APP-415] and Traffic Management Strategy (TMS) [APP-416] include measures to minimise disruption, including managed traffic controls (section 6 of the CTMP), a sequential approach to road closures where practicable (TMS - referenced throughout), traffic marshals at temporary access points (paragraph 6.3.2 of the CTMP), appropriate visibility splays (section 5.1 of the CTMP), advance signing (section 5.9 of the CTMP), and temporary traffic management arrangements designed in accordance with relevant guidance (section 2.3 of the TMS). Accordingly, whilst temporary traffic impacts on Chalk Lane may occur during construction, the ES concludes that access to Albany Business Centre would be maintained and that residual effects would be minor adverse and not significant. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of the Project, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-240	EIA approach and methodology	Land plots 12-004 Impacts of DCO: during construction Such disturbance is expected to include noise, dust, increased traffic movements which will again make it difficult for businesses to operate.	The Applicant notes the registered proprietors' concerns about impacts to their business operation during construction, including impacts from noise, dust and increased traffic movements. The Application has assessed likely significant environmental effects, including noise (see Environmental Statement (ES) Chapter 15 Noise and vibration [APP-094]), dust (see ES Chapter 6 Air quality and odour, (Document reference 6.1, DCO Volume 6, Version 1), traffic movements (see ES Chapter 18 Traffic and transport, [APP-097]) and impacts to business (see ES Chapter 17 Socio-economics tourism and health, (Document reference 6.1, DCO Volume 6, Version 1). Construction phase impacts are managed by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). The Applicant further notes that the ES concludes that no significant residual effects to businesses are anticipated (see ES Chapter 17 Socio-economics tourism and health (Document reference 6.1, DCO Volume 6, Version 1).
RR-259-241	Noise and vibration	Land plots 12-004 Impacts of DCO: during construction The tenants of Albany Farmhouse are likely to be particularly sensitive to the additional noise and pollution caused by the proposed access road adjacent to	The construction and operational phase noise and vibration impacts of the Project have been assessed, as reported in ES Chapter 15 Noise and vibration [APP-094].

Reference	Theme	Issue raised	The Applicant's response
		this Property (and the proposed works and new Pump Station's location on land in separate ownership, but located nearby).	With reference to the construction noise and vibration assessment, as set out in ES Appendix 15.1 Construction noise and vibration assessment [APP-179], Albany Farmhouse (Albany Farm Care Home, R36, located a minimum of 100m south of the proposed access route) would be affected by low or negligible levels of construction noise, below baseline residual sound levels, with no night-time construction activity. Nevertheless, as a minimum all construction noise impacts/effects would be mitigated through the implementation of BPM with additional noise and vibration mitigation measures where required. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) provides potential mitigation options, the final package of noise mitigation will be identified in a Noise and Vibration Management Plan to be submitted to each local planning authority for approval prior to commencement of construction. Consequently, no significant construction noise and/or vibration impacts/effects would result. The likely operational noise effects of IPS-F (based on worst case assumptions) are assessed in ES Chapter 15 Noise and vibration [APP-094]. Table 15-39 shows that the threshold for likely significant effects is anticipated to be exceeded at FR2 close to IPS-F (and closer to IPS-F than Albany Business Park or the residential care home at Albany Farmhouse); hence, without mitigation, effects on this NVSR are temporary, long-term and likely significant. AGP emergency generator operational noise effects are temporary, long-term and not significant at any other NVSRs. As likely significant effects are predicted at FR2, secondary mitigation measures have been identified in ES Appendix 15.3 Operational noise assessment [APP-181]. With this mitigation the potential for noise disturbance at Albany Business Park or the residential care home at Albany Farmhouse would be very unlikely. No significant operational vibration sources are proposed, and the route is circa 300m from the NVSRs. As such, the potential for vibration disturbance at Albany Business Park or the residential care home at Albany Farmhouse is negligible.
RR-259-242	Landowner engagement	Land plots 12-004 Impacts of DCO: during operation There is a risk that the rental income from the commercial premises may be adversely affected due to temporary or permanent rent reductions, rent-free periods, restrictions arising from rent review provisions, any caps on commercial rents, or difficulties in securing and retaining tenants. In addition, there is a risk that the parking area may be temporarily disrupted where emergency works, inspections, repairs, maintenance or other activities are required in connection with the pipeline.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Please refer to RR-259-13 and RR-259-14 for the Applicant's response to how impacts on Albany Business Centre and Albany Farm Care Home have been assessed. The Project has been designed to maintain access to Albany Business Centre throughout construction and operation. A key mitigation measure is that construction access to IPS-F and the associated construction compounds would utilise a separate temporary

Reference	Theme	Issue raised	The Applicant's response
			construction access from Chalk Lane, rather than routing construction traffic through Albany Business Centre. The Albany Business centre access road is included in the Order Limits as an option for operational vehicles to access IPS-F once a week, once constructed. Construction vehicles would access to IPS-F and the associated construction compounds directly from Chalk Lane to the north of Albany Farm. This is controlled through the Framework Construction Traffic Management Plan (CTMP) [APP-415], the Access and Rights of Way Plans [APP-015] and Schedule 1 to the Draft Development Consent Order [APP-023]. In addition, the Framework Construction Traffic Management Plan (CTMP) [APP-415] and Traffic Management Strategy (TMS) [APP-416] include measures to minimise disruption, including managed traffic controls (section 6 of the CTMP), a sequential approach to road closures where practicable (TMS - referenced throughout), traffic marshals at temporary access points (paragraph 6.3.2 of the CTMP), appropriate visibility splays (section 5.1 of the CTMP), advance signing (section 5.9 of the CTMP), and temporary traffic management arrangements designed in accordance with relevant guidance (section 2.3 of the TMS). Accordingly, whilst temporary traffic impacts on Chalk Lane may occur during construction, the ES concludes that access to Albany Business Centre would be maintained and that residual effects would be minor adverse and not significant. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of the Project, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-259-243	Landowner engagement	Land plots 12-007 Impacts of DCO: now As above	Please refer to the response to RR-259-238 regarding the Applicant's response to the impacts of the DCO now.
RR-259-244	Landowner engagement	Land plots 12-007 Impacts of DCO: during construction As above	Please refer to the Applicant's responses to RR-259-239, RR-259-240 and RR-259-241 and regarding the Applicant's response to the impacts of the DCO during construction.
RR-259-245	Landowner engagement	Land plots 12-007 Impacts of DCO: during operation As above	Please refer to the Applicant's response to RR-259-242 regarding the Applicant's response to the impacts of the DCO during operation.
RR-259-246	Landowner engagement	Land plots 12-008 Impacts of DCO: now As above	Please refer to the Applicant's response to RR-259-238 regarding the Applicant's response to the impacts of the DCO now.

Reference	Theme	Issue raised	The Applicant's response
RR-259-247	Landowner engagement	Land plots 12-008 Impacts of DCO: during construction As above	Please refer to the Applicant's response to RR-259-239, RR-259-240 and RR-259-241 and regarding the Applicant's response to the impacts of the DCO during construction.
RR-259-248	Landowner engagement	Land plots 12-008 Impacts of DCO: during operation As above	Please refer to the Applicant's response to RR-259-242 regarding the Applicant's response to the impacts of the DCO during operation.
RR-259-249	Location of the proposed pipeline routes	Mark-up of Landowner Consultation Plan suggesting a proposed alternative pipeline route and tunnel shaft construction compound location.	Please refer to the Applicant's response to RR-259-17.
RR-259-250	Location of AGP	Mark-up of Works Plan Sheet 6 of 30 suggesting a proposed alternative pipeline route and tunnel shaft construction compound location.	Please refer to the Applicant's response to RR-259-17.
RR-259-251	Location of the proposed pipeline routes	Annexure 4 Plan showing proposed alternative location to Tunnel	Please refer to the Applicant's response to RR-259-17.
RR-259-252	Public Rights of Way (PRoW)	Annexure 5 PROW plan	A Framework Rights of Way Management Plan (RoWMP) has been prepared and can be found appended to the Framework Construction Traffic Management Plan (CTMP) [APP-415]. This management plan has been informed by engagement with Hampshire County Council and presents the proposed temporary and permanent diversions/closures to the Public Rights of Way (PRoW) network during construction.

Table 2-49 The Applicant's response to RR-272 from Ian Judd and Partners on behalf of Roger Page

Reference	Theme	Issue raised	The Applicant's response
RR-272-1	Greeting	Relevant Representation Prepared on Behalf of Roger and Sue Page In Relation to Hampshire Water Transfer and Water Recycling Project 1. Key information Name of Interest party Roger and Sue Page Business Name Grayswood Carriage Driving Address	The Applicant notes this comment.

Reference	Theme	Issue raised	The Applicant's response
		[REDACTED] Email address [REDACTED] Telephone number [REDACTED]	
RR-272-2	Landowner engagement	Name & Address of Property Affected Land at Low Hill Farm Land Plan Reference No: 22-001 22-002 22-003 22-005 22-006 22-007 22-008 22-009 Area of Acquisition Rights requested 6013 square metres 22823 square metres 93 square metres 549 square metres 2300 square metres 34288 square metres 1287 square metres Area of Temporary Rights Requested 840 square metres Linear length of pipe Approx 310m Use of Land Equestrian use and Carriage Driving Interest Parties on my land: Land is Occupied by the owner	The Applicant notes this comment.

Reference	Theme	Issue raised	The Applicant's response
		Land Agent Instructed: Ian Judd and Partners, 4 High Street, Bishops Waltham, Southampton, Hampshire, SO32 1AB (redacted)@ianjuddandpartners.co.uk [MAP OF PROPERTY]	
RR-272-3	Principle of development	2. Summary of Submission 2.1. I wish to become an interested party and submit my strongest objection to this Development Consent Order application.	The Applicant notes this comment.
RR-272-4	Land use and agriculture	3. Summary of Land Use 3.1. I own a total of 66.64 acres (26.97 hectares) of land at Low Hill Farm. The land is used in conjunction with Grayswood Carriage Driving Centre. We are a British Driving Society Approved Examination Centre and operate a school teaching members of the public how to drive carriage horses. We also undertake carriage hire, breed and sell carriage horses and ponies, sell carriages, and run a livery yard.	The Applicant notes this description of the existing use of the land. Low Hill Farm is identified within ES Chapter 12 Land use and agriculture [APP - 091] as an equestrian and outdoor activities business within the study area and has been considered as part of the assessment of commercial property and land. ES Chapter 12 Land use and agriculture [APP - 091] considers effects on businesses arising from impacts on local road networks and changes in their operating environment, together with the effects of temporary or permanent loss of agricultural land and impacts on agricultural land use. The Applicant has undertaken engagement with landowners and occupiers to understand the extent and nature of landholdings, agricultural operations and business activities. The Applicant notes the information provided regarding the operation of Grayswood Carriage Driving Centre. This business forms part of Low Hill Farm and has been considered within the assessment as an equestrian and outdoor activities receptor. The assessment presented in ES Chapter 12 Land use and agriculture [APP - 091] concludes that effects on equestrian and outdoor activity businesses would be minor adverse and not significant.
RR-272-5	Landowner engagement	4. Impact on Business 4.1. The loss of the land would have a significant impact on carriage driving lessons. It would not be safe for inexperienced students to pass working machinery with horses and carriages. The affected area is our main teaching area, and its loss would require us to close the teaching element of our business. 4.2. The excavation of the track would also have a significant impact. The track serves six residential properties as well as our business and is likely to have more than 100 vehicle movements each day. It would need to remain open at all times. In addition to vehicle movements, we regularly use the track with horses and carriages, and any stones or debris left on the track could damage the horses' feet. 4.3. The affected land is grazed by our brood mares and foals. We breed carriage horses and ponies, with around seven foals each year. Brood mares would not be safe adjacent to working machinery, as they are easily spooked	Following the Spring 2025 Consultation, further design refinements were made in this location to take into account the respondent's feedback in relation to the carriage riding business. The pipeline route was amended, and trenchless construction was extended to reduce impact on existing land uses. Section 7 and Appendix G of the Scheme Development Report [APP-075] set out this design refinement. As such, the track referred to by the respondent is not being excavated and will remain accessible during the construction of the Project. The Applicant acknowledges that the respondent's land will also be impacted by open-cut trenching construction methodology for construction of the pipeline. During the construction of the Project, the respondent will not be able to use land occupied by the working width but the Applicant confirms it will seek to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the

Reference	Theme	Issue raised	The Applicant's response
		and could be injured. We keep the stallions in the middle field, which is surrounded by high hedges. Mares and stallions must be kept out of sight and smell of each other, which would not be possible if Southern Water removes the hedges.	detailed design once the Applicant can confirm the final working areas required. As secured within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), the Applicant confirms access provisions will be incorporated into temporary fencing where reasonably practicable to maintain access for the respondent. Where reasonably practicable, access points will be provided in consultation with the respondent to allow access across the construction working width and thereby mitigate temporary field severance., the Applicant confirms access provisions will be incorporated into temporary fencing where reasonably practicable to maintain access for the respondent. Where reasonably practicable, access points will be provided in consultation with the respondent to allow access across the construction working width and thereby mitigate temporary field severance. As detailed within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), secured by Requirement 6 of the Draft Development Consent Order [APP-023], the Applicant confirms the associated security and protection of livestock, including appropriately fencing the construction corridor to prevent animals from gaining access. This plan also confirms that the Project will appoint an Agricultural Liaison Officer ("ALO") who will act as a liaison between landowners and the appointed contractor. The ALO will be the primary contact for ongoing engagement with landowners, occupiers and their agents about practical agricultural matters before and during construction. The Applicant also confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works and operation of the pipeline and tunnel in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-272-6	Landowner engagement	5. Southern Waters Conduct to date 5.1. We have been disappointed in Southern Water's conduct to date. They, via their agents have been incompetent with survey access, and the agents threatening compulsory purchase at every encounter. 5.2. We do not believe any engineers or designers (other than ecologists) have ever visited the farm to understand the constraints of the holding. 5.3. We took part in the public consultation in 2024 & 2025, yet our concerns have never been taken seriously and have never been addressed. The public consultations were just a formality that Southern Water gave lip-service to. 5.4. They have been unwilling to work with us from the start, their communication has been poor and we feel the relationship is badly damaged before works even begin. 5.5. We believe landowners should be treated with respect, if such projects are going to impact their private land. We don't think Southern Water should be granted Compulsory Purchase rights under the DCO. They should be made to reach commercial agreements.	The Applicant does not recognise the accusations levelled at its approach to landowners. Following the Spring 2025 Consultation, the Applicant made design refinements to take into account the respondent's feedback. The pipeline route was amended, and trenchless construction was extended to reduce impact on existing land uses. Section 7 and Appendix G of the Scheme Development Report [APP-025] set out this design refinement, demonstrating the applicant has sought to address the concerns raised by the respondent. The Applicant confirms its preference to reach a voluntary agreement with the respondent. In accordance with the Statement of Reasons (APP-025) the Applicant considers that the relevant tests for compulsory acquisition have been met. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or

Reference	Theme	Issue raised	The Applicant's response
			• there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance.
RR-272-7	Landowner engagement	6. Need for Compulsory Purchase Powers 6.1. The Department for Communities and Local Government, Planning Act 2008, Guidance related to Procedures for the compulsory acquisition of land (CA Guidance), sets out the requirements Acquiring Authorities should meet to be granted CPO powers. 6.2. Para 6. "provides that a development consent order may only authorise compulsory acquisition if the Secretary of State is satisfied that: - the land is required for the development to which the consent relates, or is required to facilitate, or is incidental to, the development,". 6.3. Para 8. "The applicant will also need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate"	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-272-8	Landowner engagement	6.4. Para 9. "The applicant must have a clear idea of how they intend to use the land which it is proposed to acquire. 6.5. Para 11. Section 122 of the Planning Act sets out two conditions which must be met to the satisfaction of the Secretary of State before compulsory acquisition can be authorised. The first of these is related to the purpose for which compulsory acquisition is sought. These three purposes are set out in section 122(2): (i) the land is required for the development to which the development consent relates. For this to be met, the applicant should be able to demonstrate to the satisfaction of the Secretary of State that the land in question is needed for the development for which consent is sought. The Secretary of State will need to be satisfied that the land to be acquired is no more than is reasonably required for the purposes of the development. (ii) the land is required to facilitate or is incidental to the proposed development. An example might be the acquisition of land for the purposes of landscaping the project. In such a case the Secretary of State will need to be satisfied that the	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance. The Applicant's proposed use of the land is set out in Sheet 22 of the Works Plans [APP-014] with detail of each Works Number set out in 'Schedule 1 – Authorised Development' to the Draft Development Consent [APP-023].

Reference	Theme	Issue raised	The Applicant's response
		development could only be landscaped to a satisfactory standard if the land in question were to be compulsorily acquired, and that the land to be taken is no more than is reasonably necessary for that purpose, and that is proportionate.	The respondent is affected by 'Works No.4 – Pipeline between the WRP site and Otterbourne WSW', "Works No.6 – Construction Compounds' and Works No.7 – Environmental Mitigation and Enhancement Areas, for which the Applicant is seeking the acquisition of rights as set out in Sheet 22 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2). The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-272-9	Location of the proposed pipeline routes	6.6. We believe that part of the land included within the order limits is not necessary to facilitate the scheme and it volume of land taken is not proportionate. 6.7. On our property the order limits extending to 7.36 acres for 310 linear meters of pipe, which equates to an average of 96m in width, with a maximum width of around 120m. This is hugely disproportionate for the need to lay a 0.8m pipe. 6.8. The Acquiring Authority have not provided any justification for the scale/quantum of the Order Limits. They have stated (Para 3.3.3 Document Reference 4.1) that the maximum working width is 40m. Yet later (para 3.3.1 Document Reference 4.1- please note numbering error in document) the working width may be up to 50m. 6.9. We understand that Southern Water have chosen not to undertake detailed design and want an element of flexibility, this flexibility could be reduced to 20m in width. It is clear that the scale of the Order Limits significantly more than is reasonably necessary or proportionate for a pipe that 0.8m in width.	The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The design of the Project as set out in the DCO application provides flexibility for refinement informed by further surveys and investigations at the detailed design stage. The detailed design will be developed following approval of the DCO application and the appointment of a Contractor. This approach ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs. The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline Construction Environment Management Plan Outline CEMP [Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m for a maximum length of 42m. In accordance with the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition have been met. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits, whilst ensuring suitable flexibility is retained

Reference	Theme	Issue raised	The Applicant's response
			until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) sets out the maximum diameter of the pipelines for the different Project components, which may be greater than the 800mm referenced by the Respondent. The Applicant considers the permanent rights sought are justified in order to protect and preserve the integrity of the Project.
RR-272-10	Location of the proposed pipeline routes	6.10. We believe the Order Limits should be significantly reduced to a maximum of 20m. If the Acquiring Authority require a greater area for unnecessary off-site storage, they can rent commercially available space off site. 6.11. There is insufficient justification for width of the Order Limits within their submission and we therefore believe the Secretary of State should significantly reduce the width to no more than is reasonably required for the purposes of the development.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide the necessary space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas, and enable safe and efficient construction operations. This is set out at paragraph 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. If part of the required construction storage were to be located off-site, this would significantly increase the duration of construction works and the number of construction vehicle movements on the highway network. Both of these factors would result in adverse impacts on the environment and local communities. The Applicant has provided detail in ES Chapter 3 Description of the Proposed Development [APP-082] regarding the compound requirements and as evidenced in the Statement of Reasons [APP-025], the Applicant considers that the land required for the Project has been justified. The Applicant has identified construction compounds along the pipeline route to facilitate direct access to the working area. This also reduces traffic impacts on the local road network and brings efficiencies with construction.
RR-272-11	Location of the proposed pipeline routes	7. Scale of the Working Area 7.1. We believe the Working Width is excessive, unjustified and should be reduced. The justification for the "Working Width"□ is lacking any reality of what may be required for construction. Below is an extract Graphic 3-3 Para 3.5.92 document Reference 6.1. [GRAPHIC]	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, which is secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3)). This would provide the necessary space for a haul road, construction working areas, material storage areas, pipeline trench and soil storage areas. This is set out at section 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3)). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m, over a distance of a maximum of 42m.

Reference	Theme	Issue raised	The Applicant's response
			The haul road/working area must be a sufficient width to allow a suitably sized excavator to track back at 90 degrees to the pipe to lift it and then lower into the trench. A suitably sized excavator capable of carrying out a tandem lift of a string of pipes would circa 11m long hence the 11m required. The working area for the trench excavation is calculated using the width of the excavator capable of pipeline installation (circa 3.5m) and a 2m deviation of the pipeline route in each direction without compromising the pipelaying process. If the pipeline has to change direction the joints are designed to allow a slight angle deviation to alter the direction this is a gradual process and requires sufficient space to allow for it. Therefore, a total of 7.5m. The pipe storage/jointing area must be wide enough to allow the pipes to be welded together to form the strings before lowering into the trench. As there will be welders working on this while the excavator is operating a 1m safety exclusion zone has to be in place. The total of the pipe storage/jointing area is therefore a total of 3.5m The area required for topsoil storage is based on topsoil being 200mm thick, which equates to $8m^3$ for a 40m working width. With a side slope of 1:1 and maximum height of 1.8m an area of 7m has been allocated which includes for any bulking factor. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The area required for subsoil provides enough width in this area to segregate upper and lower subsoils, therefore there would be two separate mounds, which ensures the subsoil can be reinstated properly. A 1:1 side slope and a bulking factor has been incorporated which equates to 7m. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The above areas equate to a working width of 40m.
RR-272-12	Alternatives	7.2. This has a "Working Area and Haul Road" of 11m and a pipe trench 4m wide. This is excessive, yet only totals 15m in width. They want a further 25m for topsoil and subsoil storage, this is not necessary, reasonable or proportionate.	Please refer to the Applicant's response to RR-272-11.
RR-272-13	Location of the proposed pipeline routes	7.3. I have undertaken a simple calculation of what may be needed as a working width - The Haul Road may be 3m wide, with occasional passing places, - Working area 8m, this allows 6m of digger working area, plus 2m pipe storage - Pipe width â€“ this will be 1.5m plus say 1.5m each side of pipe = 4.5m - Topsoil Storage - A fair estimate is assumed 150mm of top soil, across 20m equates to 3m3 of top soil, stacked at 1:2, say 2.5m x 1.25m = 3.75m3 ,therefore 2.5m for topsoil storage.	Please refer to the Applicant's response to RR-272-11.

Reference	Theme	Issue raised	The Applicant's response
		- Sub-soil Storage - If the trench is 4m wide and assume a depth of 2m (2.15m below ground level) deep 7.5m3 of subsoil, again assume 1:2 stack equates to 4m of subsoil storage. - Excess 2m excess for fencing and other uses - Total working area required - 24m in width	
RR-272-14	Location of the proposed pipeline routes	7.4. It is completely unjustified, unreasonable and unnecessary for the purpose, and disproportionate to permit a working area greater than 24m in width for open cut sections of pipe.	Please refer to the Applicant's response to RR-272-11.
RR-272-15	Landowner engagement	7.5. If Southern Water wish to use additional space this can be done by agreement at a market rent with individual landowners.	The Applicant has been seeking voluntary agreements for all land identified for temporary use. Details of this engagement can be found within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1). As detailed within the Statement of Reasons [APP-025], temporary possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the project. Whilst the Applicant's preference is to reach a voluntary agreement, it considers that the temporary possession powers sought within the DCO are necessary to ensure that the project can be delivered where agreement cannot be reached. Reasonable losses incurred by landowners arising out of the temporary use of land will be reimbursed in line with the Compensation Code. The Applicant therefore considers that the temporary possession powers sought are justified and proportionate, whilst maintaining that a voluntary agreement remains its preferred outcome where possible
RR-272-16	Location of the proposed pipeline routes	8. Scale of Easement Width 8.1. We haven't been provided with any justification of the easement width restriction. Southern Water requested a 11m easement for open cut, with permanent restriction place on this land. Yet for tunnelled section the easement has been reduced to 5m. 8.2. We have assessed other water providers easement width and the typical easement width for an 800mm pipe is 8m total width. 8.3. We have requested justification for this easement width; this hasn't been supplied. We therefore believe this is unreasonable, unjustified and disproportionate and should be reduced.	The purpose of the easement is to protect the integrity and operational requirements of the pipeline and to ensure appropriate access for inspection, maintenance, repair and replacement activities. The required width has been determined following a detailed technical assessment, taking account of the pipeline's diameter, depth, construction methodology, location and operational function. For sections of pipeline installed using open-cut construction, the Applicant is seeking an easement width of 11m (5.5m either side of the pipeline). This reflects the access and operational requirements associated with maintaining and, if necessary, excavating the pipeline in the future. Notably, this represents a reduction from the Applicant's published stand-off guidance for water mains of a comparable size and depth [1], which would typically require a wider protected corridor. This reduction from the normal requirement has been communicated to landowners and their agents where this is being challenged.

Reference	Theme	Issue raised	The Applicant's response
			For sections constructed using trenchless techniques, a reduced easement width is considered appropriate, taking into account depth, construction methodology and location. As the pipeline is installed at greater depth and future maintenance or operational access would be undertaken from either side of the trenchless section rather than directly above it, the same level of restriction is not required. The easement width has therefore been tailored to reflect the differing operational requirements of the construction methodologies. The Applicant is therefore satisfied that the easement widths proposed represent the minimum reasonably required to protect the pipeline and secure its safe operation over its lifetime.
RR-272-17	Landowner engagement	9. Private Negotiations and Alternative to Compulsory Purchase 9.1. We understand that it is not for the planning Inspectorate to comment on the terms of any private negotiated agreements. We must comment that Southern Water have been very difficult to work with. They have dictated terms, without giving any consideration to amending the terms. Our opinion is that the terms offered are significantly worse that those under compulsory acquisition. 9.2. They are only playing lip-service and have no intention of reaching any form of settlement with Landowners and Occupiers. This is apparent from the Preapplication Land and Rights Negotiation Tracker (Document 4.4) only 1 landowner has returned Heads of Terms out of 172 Category 1 Landowners. The one that has been returned is a middle section of a drill section, so no above ground access is needed. 0.58% sign up rate, clearly demonstrates that Southern Water have not made any significant effort to reach agreement with Landowners and Interested Parties and they are relying on taking land by compulsion. 9.3. Not a single Option Agreement has been entered into. 9.4. I believe it is disingenuous to categorize me as "Head of Terms negotiation ongoing" (yellow status). This is not true, Southern Water have shown no interest in reaching an agreement with us. I request that my status is amended to "Heads of Terms agreements unlikely before close of examination (red)".	The Applicant does not recognise the accusations levelled at its approach. The Applicant remains committed to working collaboratively with landowners and disagrees with respondent's suggestion that they have been unwilling to enter into any form of negotiations. The Applicant has made several amendments to the proposed Heads of Terms as confirmed by a relevant representation made by a member of the Land Agent Group (RR-233) and improved the commercial offer during the negotiations to demonstrate this preference. Whilst the Applicant would prefer to be able to advise the Examining Authority of a higher return of signed Heads of Terms, it does not consider this to be because the terms offered to the respondent are unreasonable. To date, despite formally requesting evidence demonstrating why the commercial offer is considered unreasonable on 28 January 2026, the Applicant is yet to receive a response. The Heads of Terms proposed by the Applicant closely align with those adopted across other utilities and infrastructure projects, which have also been reviewed and accepted by respective land agent groups. As detailed within the Consultation Report (APP-029), Statement of Engagement (APP-072) and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with landowners regarding a voluntary agreement. The Applicant refutes the suggestion that it seeks to rely on statutory powers and confirms its preference to reach a voluntary agreement. The Applicant considers that the status recorded in the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1) is correct given that the Heads of Terms for a voluntary agreement have been issued and are being discussed with the respondent's representative. Following the Heads of Terms being issued on 6 March 2026, the Applicant discussed the Heads of Terms with the respondent's representative at a meeting on 7 April 2026. Following this, the Applicant requested a further meeting on 17 July 2026 and, after issuing a proposal for revised terms on 7 August 2026 incorporating amended provisions and improved commercial

Reference	Theme	Issue raised	The Applicant's response
			terms, sought an additional meeting with the respondent's agent on 11 September 2026, evidencing the Applicant's attempts to reach a voluntary agreement. The Applicant has organised a site meeting with the respondent and their representative on 24 November 2026 to discuss their feedback further.
RR-272-18	Construction impacts and effects	10. Land Quality and Water Logging 10.1. Our soils comprise of Windsor Soil Type, seasonally wet deep clay, described as slowly permeable seasonally waterlogged clayey soils with impeded drainage. 10.2. Our land can become very wet during the Winter. We wouldn't take a tractor onto our land between November and March, as they will get stuck. 10.3. We believe it will be impossible to work on the land for 4 to 5 months of the year, particularly when the top soil has been stripped and the subsoils compacted with heavy machinery. There is insufficient information within the applicant's submission as how they are going to deal with this issue. How they are going to stop soil erosion and water and sediment runoff to the local streams and ditches. 10.4. How can we, the landowner, stop the contactors if the ground conditions become detrimental to work in. If the Landowner is unable to stop work, which competent authority will have this power.	The Applicant notes the landowner's comments regarding the characteristics of local soils and potential waterlogging. ES Appendix 12.1 Agricultural land quality [APP-169] identifies the Windsor soil association, comprising slowly permeable clayey soils with impeded drainage, as one of the most prevalent soil types within the Order Limits. Measures for the handling, storage and reinstatement of soils are set out within the Outline Soil Resources Management Plan (Outline SRMP), contained in Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). Good construction practices set out in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3), which is secured by a requirement in the DCO, will manage the effects of construction. The mitigation measures outlined in the document will be carried forward and developed into a detailed CEMP, which will be prepared by the Contractor prior to the commencement of construction of the Project. With respect to landowners stopping contractor works, the Outline SRMP highlights the appointment of an Agricultural Liaison Officer (ALO) who will be the primary point of contact for landowners to raise concerns during construction. The roles of the ALO are set out in paragraph B.2.16 of Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and include the undertaking of site inspections during construction to monitor working practices including implementation of soil handling methodologies.
RR-272-19	Landowner engagement	11. Conclusion 11.1. For the reasons set out above, I object to the proposed compulsory acquisition powers and the current extent of the Order Limits as they affect Low Hill Farm and Grayswood Carriage Driving. The proposed works would have a serious and disproportionate impact on the operation of the business, the safety and welfare of horses, access to residential properties and the long-term condition of the land. 11.2. I request that the Secretary of State does not authorise compulsory acquisition powers over any land or rights that are not clearly demonstrated to be necessary, reasonable and proportionate. In particular, the Order Limits, working width and permanent easement width should be substantially reduced, and Southern Water should be required to engage properly with affected landowners to reach negotiated agreements wherever possible.	The Applicant notes this summary comment and refers the respondent to its responses above.

Table 2-50 The Applicant's response to RR-274 from Rookesbury Estates Limited

Reference	Theme	Issue raised	The Applicant's response
RR-274-1	Landowner engagement	The proposed development will have unacceptable impacts on the operation of the Rookesbury Estate that have not been fully considered by the Applicant. Further details can be found in our representations to follow today.	The Applicant notes this comment, however as detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 2.2, DCO Volume 2, Version 2), the Applicant has undertaken extensive engagement with landowners and considered all feedback provided throughout statutory and non-statutory consultation. The Scheme Development Report [APP-073, APP-074 and APP-075] sets out the process that was undertaken to select the pipeline routes, construction compounds and AGP sites.
RR-274-2	Landowner engagement	SOUTHERN WATER SERVICES LIMITED Hampshire Water Transfer and Water Recycling Project Registration Submission Registration submission submitted by: Rookesbury Estates Limited, Rookesbury Estate, Wickham, Hampshire Interest in scheme proposals: Potentially affected Landowner Landowners Agent: Harriet Walter, Rosehill Advisors Potentially affected properties: Site 1: Land adjoining the eastern side of Hoads Hill immediately north of Castle Farm Lane, Wickham - labelled 13-006 and 13-007 on the land plans to the application and annexed to this submission labelled "Plan 1". (see Plan 1 with landowner's affected property edged and hatched blue) and Site 2 Land adjoining the eastern side of the Winchester Road to the south of Blind Land, Wickham - labelled 15-003 and 15-008 on the land plans to the application and annexed to this submission labelled "Plan 3". (see Plan 3 with landowner's property edged and hatched in blue) Pipeline Section: Sections 13-006 and 13-007 (Site 1) Sections 15-003 and 15-0008 (Site 2) Overriding response to proposals: Strongly object Reasons for objection: See statement annexed	The Applicant notes this comment.

Reference	Theme	Issue raised	The Applicant's response
RR-274-3	Legislation, policy and permits	1 Relevant Planning Considerations (Site 1 and Site 2) 1.1 Site 1 and Site 2 occupy sustainable locations immediately adjacent to the settlement of Wickham and therefore offer the opportunity to deliver new residential development to meet an already growing need for housing within the Winchester District. 1.2 Both Sites have been assessed by the LPA (as set out in previous representations) and held to be capable of delivering housing development without any significant and adverse impacts as a result. Both Sites scored highly in the Council's SHELAA, yielding a minimum of 206 units across both sites. Whilst the Council can currently demonstrate a 5.5 years' supply of deliverable housing land, this level is marginal and has the potential to be eroded further given the current market conditions and housing delivery rates. This places pressure upon the local planning authority to meet the NPPF 2026 requirement of 'maintaining' a deliverable supply of housing (NPPF Policy HO3). As such, the prospect of housing being developed upon both Sites within a 5-year period is now significantly greater. This position is further supported by the most recent NPPF, which places a greater certainty on housing provision where the LPA's housing supply falls below 5 years (NPPF Policy S5 (j)), as well as promoting the concept of in-principal permissions for sustainable housing development unless the adverse harm of doing so outweighs the benefit of housing provision as set out in the wider NPPF Policy S5.	The Applicant has considered the potential for land to become developed and has amended the design of the Project where it intersects with land that is allocated in an adopted or emerging local plan, and where there is a live or approved planning application. The Applicant has confirmed that no planning application has been made on either site and neither site is allocated for residential development in WCC's adopted or emerging local plan. Therefore, it would not be reasonable for the design of the Project to be influenced when there is no certainty that a development will come forward in this location.
RR-274-4	Legislation, policy and permits	1.3 For both Sites 1 and 2, it is evident that their settlement edge location, the sustainable credentials of each Site and the lack of harm arising from any development, weighs heavily in favour of housing development being permitted either through an allocation within the development plan, or as a consequence of a failure to deliver a sufficient supply of housing land. Policy L3 of the NPPF is clear that in the formulation of development plan policies and during the decision-making process, new development sites should be built out using appropriate density figures. Where developable land is sustainably located, as in this case, Policy L3 (2) confirms that the minimum density figures should be exceeded to optimise the efficient use of land. 1.4 Having regard to these circumstances, the potential of each Site to deliver the required minimum level of housing must be taken into account in assessing the suitability of both Sites to accommodate the proposed pipeline route. The planning benefits of both Sites delivering housing development at a minimum level of 206 dwellings needs to be carefully assessed against the route of the proposed pipeline, and whether as a result, this should be adjusted to exclude each Site or at the very least, minimise the impact of housing delivery on each Site by avoiding the sterilisation of potentially developable land in conflict with the advice within the Framework 2026.	The Applicant has considered the potential for land to become developed and has amended the design of the Project where it intersects with land that is allocated in an adopted or emerging local plan, and where there is a live or approved planning application. The Applicant has confirmed that no planning application has been made on either site and neither site is allocated for residential development in WCC's adopted or emerging local plan. Therefore, it would not be reasonable for the design of the Project to be influenced when there is no certainty that a development will come forward in this location.
RR-274-5	Cumulative effects	2 Site 1: Land adjoining eastern side of Hoads Hill, Wickham (Sections 13-006 and 13-007)	The Applicant has considered the potential for land to become developed and has amended the design of the Project where it intersects with land that is

Reference	Theme	Issue raised	The Applicant's response
		2.1 As outlined above generally, Site 1 is a parcel of land with significant future development value as a potential housing allocation site. Site 1 has already been considered as a future housing development site as part of Winchester City Council's SHELAA process. The current assessment of this site is that its developable and deliverable.	allocated in an adopted or emerging local plan, and where there is a live or approved planning application. The Applicant has confirmed that no planning application has been made at this site, and the site is not allocated for residential development in Winchester City Council's (WCC's) adopted or emerging local plan. Therefore, it would not be reasonable for the design of the Project to be influenced when there is no certainty that a development will come forward in this location.
RR-274-6	Cumulative effects	2.2 The owners have agreed the promotion of Site 1 for residential development with a residential developer who is looking at the potential of Site 1 to provide an additional housing allocation on the southern edge of Wickham. The proposals for the complete residential development of Site 1 are shown by the proposed layout for a residential scheme on the plan annexed to this submission and labelled "Plan 2".	The Applicant acknowledges Rookesbury Estate Ltd's aspirations to provide additional housing at Site 1. The Applicant has considered the potential for land to become developed and has amended the design of the Project where it intersects with land that is allocated in an adopted or emerging local plan, and where there is a live or approved planning application. The Applicant has confirmed that no planning application has been made at this site, and the site is not allocated for residential development in Winchester City Council's (WCC's) adopted or emerging local plan. Therefore, it would not be reasonable for the design of the Project to be influenced when there is no certainty that a development will come forward in this location. Additionally, the cumulative effects of the Project and Rookesbury Estate Ltd' aspirations have not been assessed in Environmental Statement Chapter 20 Cumulative and in-combination effects [APP-099] on the basis the Rookesbury Estate Ltd' aspirations are not advanced enough to be considered in the cumulative effects assessment, as set out in the criteria explained in Table 20-9 (Assigning certainty to 'other existing development and/or approved development').
RR-274-7	Cumulative effects	2.3 The location of Site 1 is well placed strategically being adjacent to the Croudace Homes development site on neighbouring land. This site was granted planning permission on appeal on 19 November 2025 and the appeal decision has not taken into consideration this DCO application. (Ref: APP/L1765/W/25/3366618). The combined sites are likely to share services, public open space and access in the future.	The Applicant has considered the potential for land to become developed and has amended the design of the Project where it intersects with land that is allocated in an adopted or emerging local plan, and where there is a live or approved planning application. The Applicant has confirmed that no planning application has been made at this site for the location referred to as Site 1, and the site is not allocated for residential development in Winchester City Council's (WCC's) adopted or emerging local plan. Therefore, it would not be reasonable for the design of the Project to be influenced when there is no certainty that a development will come forward in this location. The Croudace Homes development site has been assessed in the cumulative effects assessment, presented in Environmental Statement (ES) Appendix 20.2 Cumulative effects assessment [APP-209], under ID WCC EALL016. The assessment concludes there would not be a likely significant cumulative effect between the Project and the Croudace Homes development site.
RR-274-8	Landowner engagement	2.4 There are two concerns firstly the short-term impact on the farming of the land and then the major financial loss of sterilising the site from residential development due to the route of the easement.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but

Reference	Theme	Issue raised	The Applicant's response
			will be developed as part of the detailed design process. The Applicant will continue to engage with affected landowners and occupiers to understand their operational requirements and land use activities, and to identify, develop and agree, where reasonably practicable, appropriate alternative arrangements to minimise the impacts of the temporary construction works. Land will be restored to its original condition following the installation of the pipeline in accordance with the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), which includes the Outline Soil Resource Management Plan (SRMP) that forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and will be developed further into the detail SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming operations. Regarding the respondent's comment on future development, the Applicant notes this comment, however no planning application has been made at this site and the site is not allocated for development in Winchester City Council's adopted or emerging location plan. Therefore, it would not be reasonable for the design of the Project to be influenced when there is no certainty that a development will come forward in this location. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of the Project, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-274-9	Landowner engagement	2.5 Site 1 is a productive block of arable land that is let to a tenant farmer. The proposed route for the pipeline runs through the middle of Site 1 (as shown hatched blue on Plan 1). The proposed route for the pipeline will have significant detrimental impacts on the landowner.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be developed as part of the detailed design. The Applicant will continue to engage with affected landowners and occupiers to understand their operational requirements and land use activities, and to identify, develop and agree, where reasonably practicable, appropriate alternative arrangements to minimise the impacts of the temporary construction works. Land will be restored to its original condition following the installation of the pipeline in accordance with the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), which includes the Outline Soil Resource Management Plan (SRMP) that forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and will be developed further into the detail SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming operations.

Reference	Theme	Issue raised	The Applicant's response
			The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of the Project, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-274-10	Location of the proposed pipeline routes	2.6 Firstly, this proposed route will decimate this field and render it unusable during the works and following reinstatement/recovery. The severed parcels will become unworkable with large farm machinery and will therefore need to remain fallow during period of works. The tenant farmer will suffer losses over 2-3 seasons which will manifest itself in a potential rent reduction for the landowner.	The Applicant has noted this comment. The Project has been designed to reduce impacts on agricultural land wherever practicable. Following construction of the Pipeline between the WRP site and Otterbourne WSW, land will be restored to its original condition in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming operations. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions. The Applicant has included the minimum amount of land necessary to deliver the authorised development within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the authorised development. The Applicant aims to work collaboratively with landowners to address concerns and agree solutions wherever practicable.
RR-274-11	Landowner engagement	2.7 Secondly, the proposed route for the pipeline across Site 1 will, if implemented, result in the form of a perpetual pipeline easement across Site 1. This easement will significantly reduce the size of the potentially developable area of Site 1 and could render Site 1 unviable as a consequence. Each plot lost will have a significant impact on the value of the site in the region of £100,000 per dwelling. Should the site fall below a critical threshold to cover the cost of accessing and serving the site the easement could sterilise the entire residential allocation thus requiring a significant compensation package.	The Applicant notes this comment, however no planning application has been made at this site and the site is not allocated for development in Winchester City Council's adopted or emerging location plan. Therefore, it would not be reasonable for the design of the Project to be influenced when there is no certainty that a development will come forward in this location. The Applicant will continue to engage with affected landowners and occupiers to understand their operational requirements and land use activities, and to identify, develop and agree, where reasonably practicable, appropriate alternative arrangements to minimise the impacts of the temporary construction works and permanent rights required. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of the Project, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-274-12	Location of the proposed pipeline routes	2.8 As part of the planning strategy all BNG requirements will be off site and there will be no opportunity to have an easement under such uses. The	The Applicant has noted this comment.

Reference	Theme	Issue raised	The Applicant's response
		promotion of the land will see all BNG to be placed on nearby land owned by the Estate.	
RR-274-13	Location of the proposed pipeline routes	3 Requested amendments to route (Site 1) The pipeline should follow the route of the highway that runs adjacent to Site 1. This alternative will have no financial impact on Site 1 and will not require any compensation for the loss of residential dwellings on Site 1. This would also protect the residential SHLAA allocation and assist in the delivery of much needed housing for the local authority, as outlined in paragraph 1 of this statement.	Where practicable the Applicant has located the Pipeline to align with field boundaries, however this is not possible in all locations due to other technical or environmental considerations. The Pipeline has been routed in this location to avoid existing residential properties and gardens to the south and overhead cables and woodland to the north. As well as this, on the eastern side of the field there is a veteran tree which has been avoided. Siting the pipeline along the route of the highway (Castle Farm Lane) would intersect existing dwellings and vegetation, which the Project has sought to avoid. The Applicant cannot mitigate impacts on developments where no proposals have been provided or there is only hope value for the land. Where land is being promoted or affected parties are developing proposals, the Applicant will work with affected parties to ensure the potential impacts are understood.
RR-274-14	Cumulative effects	4 Site 2: Land adjoining eastern side of Winchester Road, Wickham (Sections 15-003 and 15-0008) 4.1 Site 2 comprises a parcel of land which has significant future development value as a potential housing allocation site. As outlined in paragraph 1 of this submission, Site 2 has already been considered as a future housing development site as part of Winchester City Council's SHELAA process and is actively being promoted. The current assessment of this site is that its developable and deliverable and is among the sites favoured by Winchester City Council and Wickham Parish Council.	The Applicant has considered the potential for land to become developed and has amended the design of the Project where it intersects with land that is allocated in an adopted or emerging local plan, and where there is a live or approved planning application. The Applicant has confirmed that no planning application has been made at this site, and the site is not allocated for residential development in Winchester City Council's (WCC's) adopted or emerging local plan. Therefore, it would not be reasonable for the design of the Project to be influenced when there is no certainty that a development will come forward in this location.
RR-274-15	Cumulative effects	4.2 The owners have agreed the promotion of Site 2 for residential development with a residential developer who is looking at the potential of Site 2 to provide an additional housing allocation on the northern edge of Wickham. The proposals for the development of Site 2 are shown by the proposed layout for a residential scheme on the plan annexed to this submission and labelled "Plan 4".	The Applicant acknowledges Rookesbury Estate Ltd's aspirations to provide additional housing at Site 2. The Applicant has considered the potential for land to become developed and has amended the design of the Project where it intersects with land that is allocated in an adopted or emerging local plan, and where there is a live or approved planning application. The Applicant has confirmed that no planning application has been made at this site, and the site is not allocated for residential development in Winchester City Council's (WCC's) adopted or emerging local plan. Therefore, it would not be reasonable for the design of the Project to be influenced when there is no certainty that a development will come forward in this location.
RR-274-16	Cumulative effects	4.3 The location of Site is well placed strategically being immediately adjacent to the Bewley Homes development site on neighbouring land to the immediate south of Site 2. It also relates well to the newly proposed recreation area and the existing Community Centre on Mill Lane.	The Applicant acknowledges the location of Site 2 relative to the wider strategic housing development in the area. Please refer to the Applicant's response to RR-274-15.
RR-274-17	Landowner engagement	4.4 Site 2 is a productive block of arable land that is let to a tenant farmer. The proposed route for the pipeline runs through the middle of Site 2 (as shown	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms

Reference	Theme	Issue raised	The Applicant's response
		hatched blue on Plan 3). As with Site 1, the proposed route for the pipeline will have significant detrimental impacts on the landowner.	that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be developed as part of the detailed design. The Applicant will continue to engage with affected landowners and occupiers to understand their operational requirements and land use activities, and to identify, develop and agree, where reasonably practicable, appropriate alternative arrangements to minimise the impacts of the temporary construction works. Land will be restored to its original condition following the installation of the pipeline in accordance with the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), which includes the Outline Soil Resource Management Plan (SRMP) that forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and will be developed further into the detail SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming operations. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of the Project, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-274-18	Location of the proposed pipeline routes	4.5 Firstly, this proposed route will decimate this field and render it unusable during the works and following reinstatement/recovery. The severed parcels will become unworkable with large farm machinery and will therefore need to remain fallow during period of works. The Tenant farmer will suffer losses over 2-3 seasons which will manifest itself in a potential rent reduction for the landowner.	Please see the Applicant's response to RR-274-10 above.
RR-274-19	Location of the proposed pipeline routes	4.6 Secondly, the proposed route for the pipeline across Site 2 will, if implemented, result in the form of a perpetual pipeline easement across Site 2. This easement will significantly reduce the size of the potentially developable area of Site 2 and could render Site 2 unviable as a consequence.	The Applicant aims to work collaboratively with landowners to address concerns and agree practical solutions wherever practicable. The Applicant cannot mitigate impacts on developments where no proposals have been provided or there is only hope value for the land. Where land is being promoted or affected parties are developing proposals, the Applicant will work with affected parties to ensure the potential impacts are understood.
RR-274-20	Location of the proposed pipeline routes	4.7 As part of the planning strategy all BNG requirements will be off site and there will be no opportunity to locate an easement under such uses. The promotion of the land will see all BNG to be placed on nearby land owned by the Estate.	The Applicant has noted this comment.
RR-274-21	Location of the proposed pipeline routes	5 Requested amendments to route Site 2 The pipeline should follow the route of the highway that runs along the side of the Site 2. This will have no financial impact on Site 2 and will not require any compensation for the loss of residential dwellings on Site 2. This would also protect the residential SHELAA allocation and assist in the delivery of much	Where practicable the Applicant has located the Pipeline to align with field boundaries, however this is not possible in all locations due to other technical or environmental considerations. The Pipeline has been routed in this location to avoid existing residential homes and gardens, reduce land take and reduce impacts on vegetation.

Reference	Theme	Issue raised	The Applicant's response
		needed housing for the Local Authority for the reasons set out in paragraph 1 of this statement.	Siting the pipeline along the route of the highway (Blind Lane) would intersect existing residential homes and gardens and existing vegetation, which the Project has sought to avoid. If the pipeline was to be located along the northern boundary of the field it is currently situated in, this would introduce an additional bend to the pipeline, which is unsuitable from an engineering perspective. The Applicant cannot mitigate impacts on developments where no proposals have been provided or there is only hope value for the land. Where land is being promoted or affected parties are developing proposals, the Applicant will work with affected parties to ensure the potential impacts are understood.
RR-274-22	Legislation, policy and permits	6 Comments on Southern Water's Consultation Report (Appendix F) 6.1 This consultation report incorrectly states that there are no developments planned for Site 1 and Site 2. As outlined above, promotion of the land has been agreed. Further, both Sites have scored highly in Winchester Council's SHELAA analysis.	There are no current planning applications relating to either site neither of which are allocated for development in the adopted or emerging local plan. Promotion of land through a SHELAA does not provide any indication or certainty that a development will come forward in this location.
RR-274-23	Location of the proposed pipeline routes	6.2 The Applicant has failed to provide any justification as to why the pipeline cannot be moved to alternative routes that safeguard the prospect of much needed housing in this area. Further, the Applicant has failed to work collaboratively with the landowner.	Please refer to the response to RR-274-21. The Applicant aims to work collaboratively with landowners to address concerns and agree practical solutions wherever practicable. The Applicant cannot mitigate impacts on developments where no proposals have been provided or there is only hope value for the land. Where land is being promoted or affected parties are developing proposals, the Applicant will work with affected parties to ensure the potential impacts are understood. The Applicant remains willing to discuss voluntary agreements and is continuing to engage with the respondent's land agent regarding their feedback and comments on the Heads of Terms. The Applicant has requested a further meeting with the respondent's land agent to progress discussions.
RR-274-24	Location of the proposed pipeline routes	6.3 The Applicant has suggested in point PPRS24 of this Report, that the pipeline has been moved to the field boundaries. This quite evidently isn't the case given the proposed routes of the pipeline affecting these parcels of land as highlighted in paragraphs 2 and 4 of this submission.	Please refer to the responses to RR-274-13 and RR-274-21.
RR-274-25	Location of the proposed pipeline routes	Attachments Mark-up of Land Plans, Sheet 13 of 30 Land north of Castle Farm Lane, Wickham Parcel WI14 Mark-up of Land Plans, Sheet 15 of 30 Land north of Amberwoodo Wickham - Parcel WI11	The Applicant has had regard to the attachments listed.

Table 2-51 The Applicant's response to RR-276 from Rosemary Court

Reference	Theme	Issue raised	The Applicant's response
RR-276-1	Noise and vibration	We have concerns about all of the following • Noise	The construction and operational phase noise and vibration impacts of the project have been assessed, as reported in Environmental Statement (ES) Chapter 15 Noise and vibration [APP-094]. With reference to the Construction noise and vibration assessment, as set out in ES Appendix 15.2 Construction noise and vibration assessment [APP-179], this location is representative of the assessment locations R142 and R145. Due to the proximity of the construction compound to R142, unmitigated noise levels may be significant at this location. However, as a minimum all construction noise impacts/effects would be mitigated through the implementation of Best Practicable Means with additional noise and vibration mitigation measures where required. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) provides potential mitigation options, the final package of noise mitigation will be identified in a Noise and Vibration Management Plan to be submitted to the relevant 'local planning authority for approval prior to commencement of construction. Where potentially significant effects are predicted, the Contractor will adopt additional noise and vibration mitigation measures to avoid likely significant adverse effects. With secondary mitigation, where necessary, no significant construction or operational noise and/or vibration impacts/effects would result.
RR-276-2	Air quality and odour	• Dust	Dust emissions will be controlled during the construction phase of the Project through appropriate mitigation measures for each construction activity, as detailed in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). The assessment of potential construction dust impacts within section 6.8 of ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1) has concluded that, with the application of identified mitigation measures during the construction phase of the Project, the effect of construction dust and particulates on human receptors will be not significant. The Applicant has assessed the potential dust impacts on sensitive receptors including neighbouring residential and commercial premises along the pipeline route within section 6.8 of ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1). The assessment has been undertaken in accordance with the Institute of Air Quality Management guidance on the assessment of dust from demolition and construction (v2.2 2024). The assessment takes a worst-case approach and focuses on areas where construction activity is expected to be the most intensive and where the greatest number of receptors are located in close proximity to the Project. Mitigation measures to control dust emissions during the construction phase of the Project are then identified. These measures are commensurate to the level of risk for each construction activity (demolition, construction earthworks and trackout). As the assessment takes a worst-case approach, the identified

Reference	Theme	Issue raised	The Applicant's response
			mitigation measures are therefore commensurate with the highest level of risk for each construction activity. It is understood that Rosemary Court is along Highbridge Road (B3335) in the vicinity of construction compound L-10. Whilst this area was not identified as a worst-case location in relation to construction phase activities, mitigation measures commensurate to the highest level of risk for the whole Project will be implemented across all work areas, including in the vicinity of Rosemary Court.
RR-276-3	Traffic and transport	• Traffic	A Framework Construction Traffic Management Plan (CTMP) [APP-415], with a Framework Construction Worker Travel Plan and Framework Rights of Way Management Plans appended, has been submitted in support of the Project and will be secured by Requirement 8 in Schedule 2 to the draft DCO [APP-023]. These management plans seek to minimise the impacts and disruption associated with construction traffic on the local highway. From construction compound L-10, located on Highbridge Road, Heavy Goods Vehicles (HGV) would be required to route westbound on Highbridge Road towards Colden Common and then northbound towards the M3. This routing has been agreed through consultation with Hampshire County Council which identified routes which would have the least impact on the local highway network. The Environmental Statement (ES) Chapter 18 Traffic and transport [APP-097] includes an assessment of effects with regards to road safety and did not identify any significant effects during construction or operation, including along Highbridge Road.
RR-276-4	Construction impacts and effects	• Working hours	The standard working hours for construction of the Project are secured in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) and are as follows: • Monday to Friday (excluding bank holidays): 07:00 to 19:00 in summer and 07:00 to 17:30 in winter • Saturday: 07:00 to 17:00. Works outside these standard working hours or overnight (including Sundays and bank holidays) may be required for construction of some aspects of the Project including, but not restricted to, trenchless crossings and tunnelling, construction works within or near highways and railways, tidal working and abnormal load deliveries. This may be a result of ground conditions that require continuous working or for works within highways to reduce traffic disruption. The relevant local planning authority shall be notified in advance of any proposed works outside the core working hours identified above. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) also requires a Noise and Vibration Management Plan (NVMP) to be submitted to

Reference	Theme	Issue raised	The Applicant's response
			the relevant local planning authority for approval, with section 61 applications made prior to commencement of construction works where required. Further information on the anticipated day and night-time construction activities and associated noise and vibration levels is provided in ES Appendix 15.1 Construction noise and vibration assessment [APP-179].
RR-276-5	Construction impacts and effects	• Unknown Period of time work in progress and the compound in place.	The construction programme will be further developed as part of the detailed design by the Contractor. Every effort will be made to complete construction in as short a time as reasonably practicable. However, until the detailed designed is developed, the Applicant cannot advise the duration for which the construction compounds will be in place.
RR-276-6	Terrestrial and freshwater biodiversity	• Restoration to natural habit on completion of project and timeline.	Planned mitigation for ecological habitats is set out in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1). This includes reinstatement, the strategy for which is detailed within the Outline Landscape and Ecology Management Plan (LEMP; Document reference 7.5, DCO Volume 7, Version 1) which secures the measures to ensure that habitats temporarily lost during construction will be restored. Reinstatement will take place as soon as is practicable on completion of construction and timeframes for establishment and management of reinstated planting will be defined in the detailed LEMPs.
RR-276-7	Landowner engagement	• Compensation	The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of the Project, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-276-8	Construction impacts and effects	We understand that the reservoir and the pipeline is essential infrastructure and badly needed. However we need to be reassured that the effects of the above list will be mitigated and well managed. As the compound is close to many houses and almost in our gardens and will cause much disruption to our quiet habitat. A clear synopsis of what will be done to keep all potential negative impacts to a minimum would help put residents minds at rest.	An Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3), a Framework Construction Traffic Management Plan [APP-415] and a Traffic Management Strategy [APP-416] have been published, which set out how the Project will avoid, reduce and mitigate effects on the environment and surrounding area during construction of the Project.

Table 2-52 The Applicant's response to RR-313 from Ian Judd and Partners on behalf of Stella Gamblin

Reference	Theme	Issue raised	The Applicant's response
RR-313-1	Location of the proposed pipeline routes	Please see the supporting email I write to record the considerable negative impacts, on my house, garden and living environment, of the most recently proposed route for the waste-water recycling pipeline. In contrast, a more easterly route, as outlined in the attached figure, would significantly remediate the construction impacts of the pipeline.	The figure provided by the Respondent does not show the full extent of the Order Limits as shown on Sheet 17 of the Works Plans – 2 of 3 documents [AS-008]. Sheet 17 shows that there is flexibility for the Pipeline to be located further east, as requested by the Respondent. Additionally, the provided figure shows a pipeline route within the Order Limits. The Applicant is not committing to a specific location for the Pipeline at this stage. This will be determined at the detailed design stage following approval of the DCO application. In

Reference	Theme	Issue raised	The Applicant's response
			summary, the Limits of Deviation for the Pipeline as shown on Sheet 17 of the Works Plans – 2 of 3 documents [AS-008] provides the requested flexibility. The Pipeline between the WRP site and Otterbourne WSW will not transfer treated wastewater. It will transfer a mix of recycled water and water in Havant Thicket Reservoir.
RR-313-2	Landowner engagement	By way of background, the original field, where my house, gardens and barns are located was acquired by my grandfather, Ernest Gamblin in the 1940s. My late father, Anthony Gamblin, bought the plot in the late '50s and built 'Homestead' in 1964: our family has lived her ever since.	The Applicant notes this comment.
RR-313-3	Terrestrial and freshwater biodiversity	Over the last 30 years, my late father, brother, and I have developed the garden to enhance the amenity value both for ourselves and for wildlife. For example, we have planted, and nurtured to maturity a 90-yard double, herringbone-patterned beach hedge, with inline planting of flowering Cherries (Flagrant Cloud) that lies at the eastern boundary of my plot, that would lie within, or very close to, the current construction zone.	The Applicant recognises the value that the respondent places on their private garden and has responded to the respondent's concerns regarding both the beech and flowering cherry trees in RR-313-4.
RR-313-4	Terrestrial and freshwater biodiversity	I am deeply concerned that Beeches, being shallow rooted, would be very vulnerable to changes in the water table associated with large scale earth movement. Additionally, we have a 2/3 Copper Beech circle, south-faced opening, underplanted with bluebells and with a specimen *Cercis siliquastrum* planted in the centre (all again shallow rooted). Close to the long beech hedge is a substantial *Liquidambar*, and Norwegian maple and Ginkgo biloba. Slightly further from the hedge, *Magnolia biloba*, *Catalpa* and two additional Maples.	The Applicant recognises the concern for the respondent's planting of beech and other trees and whether beech trees specifically could be sensitive to potential changes to groundwater conditions arising from the proposed earthworks, given they are generally shallow rooting. The Applicant has undertaken an Ecological Impact Assessment, set out in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1), which assesses the likely impacts and effects arising from the construction of the Project on sensitive ecological receptors. Potential hydrological impacts have been considered as part of the assessment process in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) and ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) and through the implementation of embedded mitigation measures, set out in the Outline CEMP – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1) impacts resulting from hydrological change will be managed. The Outline CEMP includes: • The requirement for a Construction Drainage Plan to be prepared post-consent, incorporating measures to manage site drainage and runoff during construction and to minimise the risk of erosion and sediment transfer. The Outline Water Monitoring Plan [APP-204] details the requirement for a Water Monitoring Plan to be developed post-consent to establish pre-construction baseline conditions and verify predicted impacts on local surface water and groundwater regimes arising from temporary and permanent construction activities.

Reference	Theme	Issue raised	The Applicant's response
			Based on implementation of the above measures, hydrological changes that could adversely impact trees, including beech trees, are not anticipated. Existing trees within and adjacent to the Order Limits have been surveyed and assessed as part ES Appendix 13.5 Arboricultural Impact Assessment (AIA) [APP-175/APP-176]. The Applicant notes that, prior to construction, a topographical survey will be undertaken and the AIA updated to reflect all areas affected by the Project and ensure the precise location of trees and Root Protection Areas are identified. An updated Tree Impacts Plan will also be prepared prior to construction and will inform construction-stage tree protection measures. This plan, along with other measures to protect retained trees, is secured through the Outline CEMP – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1). The Applicant notes that the habitat features of the respondent are located either adjacent to or outside of the Order Limits, and therefore with the above measures, no adverse impacts to these habitats, including the beech trees, are anticipated.
RR-313-5	Terrestrial and freshwater biodiversity	We also sow a wild-flower meadow each year, about 5m from the long beech hedge, that attracts and nurtures a wide range of bees, butterflies, and other insects. My partner, now retired, and I live at Homestead and in the next year or so I plan to retire here also. My partner spends most of his time, and I spend my free time, working in, and enhancing the amenity and wild-life value of the garden.	The Applicant recognises the respondent's concern for wildlife present within their land. The Applicant has undertaken an Ecological Impact Assessment as set out in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1). This has assessed the likely impacts and effects resulting from construction of the Project on sensitive ecological receptors. Where the removal of vegetation for construction is not required, existing hedgerows, trees and other vegetation will be retained and will be protected by measures set out in the Outline – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1). The Outline CEMP is secured through DCO requirement 6 [APP-023].
RR-313-6	Noise and vibration	My chief concerns are 1) the noise, disruption, dust, and other potential contaminants arising from the construction phase in close proximity to Homestead,	The construction and operational phase noise and vibration impacts of the project have been assessed, as reported in ES Chapter 15 noise and vibration [APP-094]. With reference to the Construction noise and vibration assessment, as set out in ES Appendix 15.1 Construction noise and vibration assessment [APP-179], this dwelling (R193) will be mainly affected by construction noise associated with the short-term works (<4-weeks), associated with the 'Pipeline –Construction' and 'Road Crossing' stages. As a minimum all construction noise impacts/effects would be mitigated through the implementation of Best Practicable Means with additional noise and vibration mitigation measures where required. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) provides potential mitigation options, the final package of noise mitigation will be identified in a Noise and Vibration Management Plan to be submitted to each Local Planning Authority for approval prior to commencement of construction.

Reference	Theme	Issue raised	The Applicant's response
			Vibration generating activity would not take place within a proximity to R193 that would result in adverse impact/effect of people or property. Consequently, no significant construction noise and/or vibration impacts/effects would result. R193 is more than 1km from any source of operational noise (i.e. the WRP, Break Pressure Tank and Intermediate Pumping Stations). Hence this dwelling will not experience operational noise effects from the project. The Applicant has assessed the potential impacts of construction dust and particulate matter and odour emissions within section 6.8 of ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1). Commensurate controls are detailed within environmental measures AQ1 to AQ18 as outlined in Table 5-1 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). With the implementation of mitigation measures commensurate to the highest level of risk assessed, the effect of construction dust and particulate matter emissions from the Project, including at the location of the property on Sandy Lane, is considered to be not significant.
RR-313-7	Land use and agriculture	2) structural and hydrological impacts on the soil that may ruin the long, and carefully constructed, tree and hedge environment we have created.	The Outline Soil Resources Management Plan (SRMP), as contained in Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), acknowledges that the main adverse impacts on soils during construction occur as a result of handling in inappropriate conditions, notably when the soils are too wet. Paragraphs B.9.1 to B.9.14 of the Outline SRMP set out the methods for determining appropriate soil handling conditions and criteria for when soil handling may or may not take place, and specify that soil handling should only take place in suitable soil moisture and weather conditions in order to best preserve soil structures. The Project also includes measures to protect surrounding land, vegetation and water environments during construction. Environmental Statement (ES) Chapter 19 Water Environment (Document reference 6.1, DCO Volume 6, Version 1) identifies only minor effects on surface water and groundwater, including surface water flows, infiltration and flood risk. Measures to control runoff, sediment movement and pollution, such as interception of surface water run-off, are included within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) which details the implementation of a Construction Drainage Plan. These measures are intended to minimise the risk of indirect effects on existing trees, hedgerows and associated habitats arising from changes in soil condition or water movement during construction.
RR-313-8	Location of the proposed pipeline routes	Moving the route of the pipe, and the construction zone further east, as outlined on the attached map, would reduce, although not eliminate, these concerns. The route I propose would also not additionally impact negatively on the dwelling of Linda and Susan Gamblin on the other side of Sandy Lane,	As set out in response RR-313-1, the figure provided by the Respondent does not show the full extent of the Order Limits as shown on Sheet 17 of the Works Plans – 2 of 3 documents [AS-008]. The Limits of Deviation for the Pipeline as shown on Sheet 17 of the Works Plans – 2 of 3 documents [AS-008] provides the requested flexibility.

Reference	Theme	Issue raised	The Applicant's response
		because the pipe could traverse westerly at the junction with Sandy Lane, to pick up the trajectory currently proposed to cross the land at Ash House Farm.	The Pipeline route in this location has been designed to reduce impacts on nearby residential properties and the environment. On the north-western side of Sandy Lane, the Pipeline route was refined as set out in Section F.8 in Appendix F of the Scheme Development Report [APP-075].

Table 2-53 The Applicant's response to RR-315 from Stephen Potts

Reference	Theme	Issue raised	The Applicant's response
RR-315-1	Location of proposed pipeline routes	Objection to the proposal and pipeline routing.	The Applicant has noted this comment. The Project forms a key part of the Applicant's strategy for ensuring future water supplies in Hampshire. The Project was selected by undertaking an extensive options appraisal process, as set out in the Scheme Development Report [APP-073, APP-074, APP-075]. Following the selection of the Project, the Applicant undertook a detailed site and route selection process, which considered a range of engineering, planning and environmental criteria, and has had regard to consultation and engagement feedback.

Table 2-54 The Applicant's response to RR-316 from Stephen Potts

Reference	Theme	Issue raised	The Applicant's response
RR-316-1	Landowner engagement	Representation in Response to Southern Water's Proposals for the Hampshire Water Transfer and Waste Recycling Project Introduction and Interest in the Land (reference drawing 710166-SWS-XX-XX-DR-Z-08125). We submit this representation as the long-term occupiers of the fields adjacent to Highbridge Road, SO50 6HQ. Our family has rented, occupied, and managed this land continuously for over 20 years with the consent of the landowner, [Redacted]. The land is used for grazing horses and forms an essential part of our daily life, animal care responsibilities, and long-established agricultural activity. Our horses are not kept for commercial purposes. Our house is situated next to the fields, and we access these fields directly from our property. We bought the property in 2004 to be near to our horses and our chosen lifestyle. The property is home to our adult children. The pipeline is routed directly through our fields which are also identified for use as a long term construction compound for the duration of the 5 year programme.	The Applicant has identified the respondent within the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1) as a Category 3 interest, being a party who it is considered might be able to make a relevant claim under section 10 of the Compulsory Purchase Act 1965 and / or under Part 1 of the Land Compensation Act 1973 and / or under section 152(3) of the Planning Act 2008. The Applicant wrote to the respondent on 21 September 2026 regarding occupation of the fields adjacent to Highbridge Road, SO50 6HQ as the respondent previously returned a Land Interest Questionnaire confirming they did not occupy or have an interest in the land. The Applicant acknowledges that fields adjacent to Highbridge Road, SO50 6HQ will be impacted by open-cut trenching construction methodology for construction of the pipeline and a temporary compound to support trenchless construction under the River Itchen. The Applicant has identified a need for a 40m working width in areas where the pipeline is constructed by open-cut trenching. The respondent can find details on the types of works to be undertaken in the vicinity of their property on Sheet 25 in the Works Plans [APP-014] and comprise 'Work No.4 – Pipeline between the WRP site and Otterbourne WSW' and 'Work No.6 – Construction Compound'. A description of what these Works Numbers comprise can be found in 'Schedule 1 – Authorised Development' to the Draft Development Consent Order [APP-023].

Reference	Theme	Issue raised	The Applicant's response
			As set out by the respondent, the land is used for the grazing of horses. None of the restrictions set out in Schedule 5 to the Draft Development Consent Order [APP-023] will prohibit the respondent from continuing to use the land for this purpose once construction is complete.
RR-316-2	Principle of development	SUMMARY OF OBJECTIONS Despite the Applicants assertions that there is a compelling case for the project, the construction of a +40km pipeline across the county has not been demonstrated as the least harmful or most appropriate solution. The project will cause major disruption and incur significant capital and operational costs which are funded by bill payers for decades to come. Hampshire is a coastal county and the option for desalination should be reconsidered as a strategic option for long term sustainable water supply for the region. The addition of 20 million litres per day (base load) of water is not a long term sustainable and strategic solution for a region with increasing population and water demands from facilities such as future data centres.	The Applicant disagrees that the compelling case for the Project has not been demonstrated. The Project addresses a critical, urgent and well-evidenced national, regional and local need for new water resources infrastructure. It is required to replace water no longer available through permanent abstraction reductions, eliminate reliance on drought permits, protect internationally designated chalk stream habitats and ensure resilient water supplies for customers. As set out in the Case for the Project [APP-057], the Project is firmly embedded within planning and regulatory frameworks and has been consistently identified as a necessary component of the solution to the Applicant's Western Area's water resources deficit. The Applicant's Water Resources Management Plan (WRMP19) established the need for a new strategic water resource solution, in the form of a desalination plant, to address the significant water supply shortfall in Hampshire. As part of the RAPID regulatory process, an extensive options appraisal was undertaken by the Applicant which selected the Project as the preferred solution over the original desalination proposal. Informed by WRMP19, the options appraisal considered a range of alternative technologies and solutions, and assessed these against planning, environmental, socio economic and cost criteria. The Applicant's WRMP19 was updated through an annual review to change the solution from a desalination plant to the Project. The Applicant's emerging WRMP24 and Water Resources South East (WRSE) Regional Plan both select the Project as a key component of future water supply in the Hampshire area and wider South East. Once the Applicant's WRMP24 is published (in December 2026) the National Policy Statement for Water Infrastructure is clear that the 'need' will not be revisited as part of the application for development consent.
RR-316-3	Location of the proposed pipeline routes	We strongly object to the routing of the pipeline through the fields we occupy adjacent to Highbridge Road, SO50 6HQ, and to the acquisition of those same fields as a long-term construction compound. The Applicant has not demonstrated that this route, or this compound location, is necessary, proportionate, or the least harmful option available.	The construction compound will support the construction of two trenchless sections of the Pipeline: one to the east to cross an upstream tributary of the River Itchen, and the other to the west to cross the River Itchen itself. The Applicant undertook a route selection process to determine the route for this pipeline, as set out in Section 5.11 of the Scheme Development Report – 1 of 3 documents [APP-073]. This field was selected as a construction compound location, as it aligned with the proposed route for the trenchless crossing of the River Itchen, it had limited ecological value and offered the opportunity for access from Highbridge Road (B3335).

Reference	Theme	Issue raised	The Applicant's response
			The Applicant considered a construction compound to the west of Highbridge Road (B3335), however all potential options were either heavily vegetated or wooded, within flood zones, or comprised of marshy habitat with ecological value. It was therefore determined that the construction compound should be located to the east of Highbridge Road (B3335) to avoid these impacts and risks.
RR-316-4	Location of the proposed pipeline routes	Over the last three years we accommodated many requests for access to the fields for a variety of surveys, but we were never made aware of the Applicants intention to use the fields as a construction compound. We have directly experienced a lack of consideration and care from Applicant representatives including accessing without consent, leaving field gates open to the highway when horses are grazing and damaging gates.	The proposal for the use of this field as a construction compound was consulted on at the Summer 2024 Consultation. The Applicant has endeavoured and will continue to mitigate the impact of its survey programmes on landowners. The Applicant undertook a comprehensive set of surveys in 2023, 2024 and 2025 to inform the Environmental Impact Assessment. Landowners were notified in advance of survey visits and whilst the Applicant intended to undertake surveys as per the planned programme of works, circumstances arose that required changes to be made to the timings. For example, adverse weather conditions resulted in last-minute changes and a need for additional and supplementary survey requirements arose following observations made during surveys undertaken. All surveys were undertaken at the appropriate time of year, with seasonal ecological surveys undertaken during the appropriate seasons which resulted in multiple visits to the same holdings. However, the Applicant endeavoured to consolidate survey visits where possible to reduce multiple visits by different survey teams to the same land. A comprehensive set of survey data is necessary to inform the Environmental Impact Assessment and ensure the land impacted by the Project is fully understood and appropriately mitigated. The Applicant considers the volume of survey activity to have been proportionate in order to provide a robust assessment. Where possible, access for surveys was agreed with landowners via voluntary access licences. An upfront payment was made to reflect any potential losses suffered as a result of the survey works, but landowners were able to make a claim if losses exceeded that initial payment. The Applicant will continue to engage with affected parties to seek to agree access where required by voluntary agreement where possible and aims to minimise disturbance to existing land uses as far as reasonably practicable.
RR-316-5	Land use and agriculture	These fields are not vacant nor unused land: this is long-established grazing land, occupied and managed by our family for over two decades, forming an essential part of our daily care of horses, our agricultural use of the land, and our home environment. The proposals remove this use for many years, cause serious equine welfare concerns, damage soil, drainage and habitat, and permanently alter the character and quality of the land.	Environmental Statement (ES) Chapter 12 Land Use and Agriculture [APP-091] considers the effects of the Project on agricultural land holdings, existing agricultural activities and land use receptors. The assessment includes consideration of the temporary and permanent use of land required for the Project and the potential effects on the operational capacity and viability of affected holdings. The Applicant has taken account of the existing use of the land within the assessment of likely significant effects.

Reference	Theme	Issue raised	The Applicant's response
			ES Chapter 12 Land Use and Agriculture [APP-091] also confirms that there will be no restrictions to normal agricultural operations following installation of the pipeline. The pipeline will be installed to a minimum depth of 0.9m from the crown of the pipe and the original soil reinstated over the top. The construction of the Project will result in a temporary short-term disturbance to the agricultural land, which will be reinstated to its original condition, enabling agricultural operations to resume. Land required temporarily for the siting of construction compounds will also be subject to the good practice management provisions for soil set out in the Outline Soil Resources Management Plan (SRMP), contained within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). Sensitive management of the disturbed soil resources will ensure that the land is reinstated to its original condition.
RR-316-6	Construction compound locations	The selection of this land has not been justified, and the Applicant recognises its environmental sensitivity by proposing tunnelling through the fields whilst at the same time using the same land for intensive construction compound purposes. This is inconsistent and has not been explained. The Applicant must explain why the land is considered suitable or necessary for prolonged compound use involving plant, materials, vehicle movements, lighting, hardstanding and 24-hour occupation. We estimate access is only required to approximately 25% of the land for pipeline construction purposes.	The construction compound will support the construction of two trenchless sections of the Pipeline: one to the east to cross an upstream tributary of the River Itchen, and the other to the west to cross the River Itchen itself. These works require larger construction compounds, particularly considering the length of trenchless construction under the River Itchen. As set out in RR-316-3, the Applicant considers this to be the optimal site both from a delivery and environmental perspective.
RR-316-7	Land use and agriculture	The impacts are severe, long-lasting, and in several respects irreversible. The Applicant states that the construction project will take 5 years. This means the fields are highly likely to be unusable for animal grazing for up to 10 years.	The proposed five-year construction programme applies to all aspects of the Project, as indicated in Graphis 3-2 of Environmental Statement (ES) Chapter 3 Description of the Proposed Development [APP-082]. The installation of each section of pipeline is estimated to require up to around 18 months, but similarly, this is a site-wide programme. Disturbance to individual field parcels will be temporary and short-term, as confirmed in ES Chapter 12 Land Use and Agriculture [APP-091], with land being reinstated over the pipelines as soon as is practicable. As part of the monitoring commitments set out in the Outline Soil Resource Management Plan (SRMP), provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), any defects identified and agreed in reinstated land will be ameliorated by the Contractor.
RR-316-8	Construction compound locations	A compound of this size provides a large area for the lay-down of materials, plant, site buildings and facilities. This appears to be one of the larger selected compounds along the route suggesting a high volume of material transfers, vehicle access and site facilities will be required including the use of lighting during the shorter winter days. For security purposes it has to be occupied 24/7.	Please refer to the Applicant's response to RR-136-6. Section 4.6 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) may be used at the construction compound, particularly during winter months; further information is provided in section 4.7 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3)
RR-316-9	Traffic and transport	The fields face onto Highbridge Road which is a minor road (B3335) unsuitable for frequent use by large construction and delivery vehicles. The volume of	The Applicant acknowledges the Respondents concerns regarding the use of Highbridge Road for construction access and the risk to local road users. A

Reference	Theme	Issue raised	The Applicant's response
		heavy construction traffic on the local road system increases the risk to all regular road users. We note the Applicant states construction traffic will have minimal impact on Highbridge Road despite identifying the need for a large compound area.	Framework Construction Traffic Management Plan (CTMP) [APP-415] has been prepared in support of the Project and would be secured through the draft DCO. This management plan includes measures to reduce disruption associated with construction traffic, including restrictions to Heavy Goods Vehicles (HGV) movements in network peak hours. Construction access routes are also fixed for HGVs. From construction compound L-10, HGVs would be required to route westbound on Highbridge Road towards Colden Common and then northbound towards the M3. The Environmental Statement (ES) Chapter 18 Traffic and transport [APP-097] includes an assessment of effects with regards to road safety and did not identify any significant effects during construction or operation, including along Highbridge Road.
RR-316-10	Construction impacts and effects	The land is heavily waterlogged at times during the year, especially during the winter months. Access by wheeled vehicles when waterlogged causes significant damage to the ground. Large volumes of hardstanding will need to be laid for construction traffic, materials laydown and site facilities for the construction period. This is harmful to the environment and to the long-term reinstatement of the land for agricultural use.	Good construction practices set out in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), which is secured by a requirement in the DCO, will manage the effects of construction. The mitigation measures outlined in the Outline CEMP will be carried forward and developed into detailed CEMPs, which will be produced by the Contractor prior to the commencement of construction of the Project. A Construction Drainage Plan will be developed to manage the quality and quantity of construction stage drainage. Measures required to be included in the plan are set out in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). The plan will be informed by surveys to locate drains and create pre-construction drawings to ensure appropriate reinstatement. The plan will be agreed with the Environment Agency and the relevant Lead Local Flood Authority post-DCO consent. It will include measures to minimise water within the working area and ensure ongoing drainage of surrounding land. The Outline Soil Resource Management Plan (Outline SRMP), contained in Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), emphasises the aim to minimise impacts on topography and soils and ensure land not required post-construction is restored to its previous use. An appropriately experienced soil specialist will be appointed to advise on and supervise soil handling, including identifying when soils are dry enough to be handled, and works on soil during the wetter months will be avoided.
RR-316-11	Socio-economic, tourism and health	The fields are adjacent to other houses, some of which are occupied by elderly and frail individuals who will be impacted when the land is used as a construction compound.	The Applicant acknowledges this comment. Potential effects on health and wellbeing arising from construction activities, including the use of construction compounds, have been assessed in ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1). The health assessment specifically considers the potential effects on vulnerable groups, including older people and people with existing health conditions, who may be more sensitive to changes in their environmental conditions during construction. The assessment concluded that, with the embedded mitigation measures secured through the Project, no significant adverse health effects

Reference	Theme	Issue raised	The Applicant's response
			are predicted for the local population, including vulnerable groups The assessment drew on the findings of the technical environmental assessment, including those relating to air quality, noise and vibration, traffic and transport, and concluded that any residual effects on health would be limited in scale and not significant. Mitigation measures include the implementation of the Outline Construction Environmental Plan (CEMP) (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), [APP-413] and [APP-414] for documents 2 and 3, the Framework Construction Traffic Management Plan [APP-415], controls on construction activities to manage noise, dust and vehicle movements, and ongoing communication with affected communities throughout the construction period. The health assessment takes account of potential impacts on neighbourhood amenity, including noise, visual effects, construction activities and construction traffic, together with effects on health and wellbeing, at the population level. Effects of construction activities on local residents are also considered in ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1), ES Chapter 13 Landscape and visual [APP-092] and ES Chapter 15 Noise and vibration [APP-094]. Appropriate mitigation measures are secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), [APP-413] and [APP-414] for documents 2 and 3 , including measures relating to construction management, site security, lighting and traffic management.
RR-316-12	Construction impacts and effects	The proposals will permanently alter the character and quality of the land. Restoration after major construction works is often incomplete and insufficient, particularly for grazing land.	The Outline Soil Resource Management Plan (Outline SRMP), contained in Appendix B of the Outline Construction Environmental Management Plan (Outline CEMP) (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) sets out measures to minimise the long-term impact on agricultural land and restore land used temporarily for installation of the Pipeline to its original quality. These measures include the accurate recording of soil properties and depths, the appropriate timing of works in relation to weather and soil conditions, the use of appropriate plant and equipment, and the use of experienced soil specialists to supervise and advise on soil handling and restoration works. The plan also emphasises the aim to minimise impacts on topography and soils and ensure land not required post-construction is restored to its previous use. An appropriately experienced soil specialist will be appointed to advise on and supervise soil handling, including identifying when soils are dry enough to be handled, while works on soil during the wetter months will be avoided. The Outline SRMP is based on representative sampling and laboratory analysis of soils within the Order Limits, as well as detailed Agricultural Land Classification (ALC) surveys undertaken at the Above Ground Plant (AGP) sites.
RR-316-13	Land use and agriculture	ESTABLISHED LAND USE AND EQUINE WELFARE	The Applicant notes that the land has been used for horse breeding and grazing for a prolonged period. The effects of the Project on agricultural land

Reference	Theme	Issue raised	The Applicant's response
		For more than two decades, we have exclusively used the land for breeding and grazing horses. This is a stable, long-standing agricultural use that would be severely disrupted for many years.	holdings, agricultural activities and land use receptors are assessed in Environmental Statement (ES) Chapter 12 Land Use and Agriculture [APP-091]. The Applicant refers to the response to RR-316-07. The proposed five-year construction programme applies to the Project as a whole rather than to individual land parcels. Disturbance to individual fields would be temporary and localised, with land reinstated as soon as reasonably practicable following completion of the works. The Outline Soil Resource Management Plan (SRMP), included as Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), includes requirements for soil reinstatement, monitoring and remediation of any agreed defects identified in reinstated land. These measures are contained within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and secured through the relevant requirements of the draft DCO [APP-023].
RR-316-14	Landowner engagement	The land is the long-standing home to four horses, three of whom were born in Highbridge and have grazed exclusively on this land. By the proposed start date for the project in 2028, the oldest horse will be 28 years old and will have lived his entire life on this land. The second oldest will be 25 years old, also born and raised in Highbridge. Relocating horses of this age during major construction works is neither humane nor realistic. Long term relocation of our horses would impose significant cost, increase welfare concerns, and affect our quality of life. We have expended significant cost and time creating secure paddock areas which will be lost if the proposal is allowed. Forced relocation would cause extreme stress and could lead to serious welfare consequences. In the worst case, we would face the situation of euthanising elderly horses solely because of the chosen pipeline route and the use of this land as a construction compound.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements will be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design where the mitigated land take can be confirmed. The Applicant confirms that the respondent may be entitled to claim compensation for crop loss associated with the areas used for grazing and disturbance losses arising out of the temporary use of the land for construction of the project, in line with the compensation code. This could include the buying in of feed throughout the Applicant's temporary occupation of the land due to the respondent's horses being unable to graze the land whilst the pipeline is constructed. The Applicant acknowledges the sensitivities surrounding the use of the land and welcomes engagement with the respondent to further its understanding and explore potential mitigations.
RR-316-15	Landowner engagement	With the support of the landowner, we created a sanctuary for our family, horses and a haven for wildlife. This would be lost permanently if the proposal proceeds as drafted. The following legislation has relevance. -Animal Welfare Act 2006 - imposes a duty of care to avoid unnecessary suffering. Forced relocation of elderly horses during heavy construction risks breaching this duty. -DEFRA Code of Practice for the Welfare of Horses - requires owners to provide a safe environment free from hazards such as machinery, noise, unstable ground, and disrupted fencing.	The Applicant acknowledges the legislation surrounding the keeping of horses. See responses to RR-316-05, RR-316-10, RR-316-12 and RR-316-13 confirming the measures the Applicant will take to reduce the risk of interactions with the construction of the Project. The Applicant confirms that none of the restrictions set out in Schedule 5 to the Draft Development Consent Order [APP-023] will prohibit the respondent from continuing to use the land for grazing once construction is complete. The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use land occupied by the working width but confirms that it will seek to mitigate the impact of the temporary construction

Reference	Theme	Issue raised	The Applicant's response
		-Planning Act 2008 (s.10) - requires consideration of "health, safety and wellbeing" impacts on people and animals affected by NSIPs.	works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design once the Applicant can confirm the mitigated extent of the working width required and location of the pipeline route. The Applicant acknowledges the sensitivities surrounding the use of the land and welcomes engagement with the respondent to further its understanding and explore potential mitigations.
RR-316-16	Public Rights of Way (PRoW)	PUBLIC RIGHT OF WAY The land has a well-used public right of way enjoyed by the public. Construction will disrupt access and diminish public amenity.	A Framework Rights of Way Management Plan (RoWMP) has been prepared in support of the Project and can be found appended to the Framework Construction Traffic Management Plan (CTMP) [APP-415]. This management plan has been informed by engagement with Hampshire County Council and details the proposed temporary closures and diversions to the Public Right of Way (PRoW) Network during construction. Section 11 notes that a temporary closure of Colden Common 2a for up to 18 months. Alternative routes have been identified via Colden Common 5 and 6 (north) or Colden Common 3 (south). Potential mitigation includes a footpath crossing on Highbridge Road. The impact of this temporary footpath closure was assessed in Environmental Statement (ES) Chapter 18 Traffic and transport [APP-091] and no adverse significant effects were predicted.
RR-316-17	Terrestrial and freshwater biodiversity	Ecological and Wildlife Considerations During the last 20+ years, we have purposefully managed the land to encourage wildlife diversity: -Allowing hedgerows to grow naturally, supporting birds, insects, and small mammals -Allowing grassland to grow longer, benefiting pollinators, reptiles, and small mammals -Maintaining low-intensity grazing, which supports soil health and biodiversity -There is a healthy bat population in the fields which are protected by law. We are not aware of any night time bat walkovers being conducted in our fields. We frequently witness bat activity, and the habitat is like nearby Kiln Lane which is identified as a suitable roosting environment.	The Applicant recognises the importance of the habitats at this location to terrestrial biodiversity, including bats, birds, invertebrates, small mammals and reptiles, and the measures taken by the respondent to enhance biodiversity. It is noted that sections of the habitats will be temporarily impacted for the construction of the Project and use for a construction compound. However, areas of habitat outside of the Order Limits are retained and therefore available for biodiversity during construction. The Applicant is committed to reinstating all habitats to their pre-construction habitat type and condition, secured by the Outline Landscape and Ecology Management Plan (LEMP; Document reference 7.5, DCO Volume 7, Version 1)). Additionally, Environmental Mitigation and Enhancement Area (EMEA) L-7 at this location proposes the creation of new wet woodland to expand the existing woodland parcel. Trees at this location were subject to Ground Level Tree Assessments (GLTAs) between 2022 and 2025 to assess the potential for them to support roosting bats. Although night-time bat walkovers were undertaken for the Project in 2024, these surveys were focussed on areas with the potential for significant impacts from the presence of permanent infrastructure or from habitat severance of known Annex II bat populations and were, therefore, not required at or near this location. Static detector surveys were also undertaken, collecting bat activity data, including three near this location (please refer to 6.3 ES Vol III - ES Figure 8.20 Static detector survey locations; [APP-250]). However, these survey techniques were completed at a preliminary design

Reference	Theme	Issue raised	The Applicant's response
			stage of the Project and were not required once the Habitat Suitability Modelling (HSM) approach was begun. The HSM approach identifies potential effects on bats away from roosts though a statistical technique that predicts the distribution of a species from environmental data and occurrence records. The HSM is used to predict the areas of suitable habitat for each bat species within and around the Order Limits at a landscape scale. The HSM output included heat maps of relative high and low suitability for each bat species, which are provided in ES Figures 8.22 to 8.32 [APP-252 to APP-262]. The extents and locations of these suitable areas were then used to identify the key connective locations (KCL) crossed by the Project, shown in ES Figure 8.33, Key connective locations for bats [APP-263] and represent key habitats likely to be used by significant numbers of bats (such as woodland, hedgerows and watercourses). There is a KCL at the crossing of the River Itchen (KCL-T) but no KCL have been identified in this location specifically. Secondary and tertiary mitigation will be implemented to mitigate for impacts to bats, this includes good practice and additional measures including the use of temporary fencing and acoustic barriers as detailed in the Outline Construction Environmental Management Plan (CEMP) - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1) measures TFB35 and NV2). An assessment of the impacts of the Project, including on bats, is included in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1), additional information regarding bats is included in ES Appendix 8.4 Bats [APP-130]. Details regarding habitat reinstatement are provided in the Outline LEMP (Document reference 7.5, DCO Volume 7, Version 1).
RR-316-18	Terrestrial and freshwater biodiversity	These features form part of a local ecological network. Pipeline construction and compound use will require removal or damage to hedgerows, destruction of mature native trees, compaction of soil, and destruction of wildlife habitat. Independent and thorough ecological surveys must be undertaken before any decision is made.	The Applicant recognises the importance of the habitats at this location to terrestrial biodiversity, including bats, birds, invertebrates, small mammals and reptiles. It is noted that sections of the habitats will be temporarily impacted for the construction of the Project and used for a construction compound. However, areas of habitat outside of the Order Limits are retained and therefore available for biodiversity during construction. The Applicant is committed to reinstating all habitats to their pre-construction habitat type and condition as secured by the Outline LEMP (Document reference 7.5, DCO Volume 7, Version 1). Additionally, EMEA L-7 at this location proposes the creation of new wet woodland to expand the existing woodland parcel. Mitigation will be implemented reduce effects on retained habitats, including the good practice measures detailed in the Outline CEMP – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1). This includes soil management measures to avoid compaction in tree root protection areas (TFB9, TFB19) and an Outline Soil Resource Management Plan. Ecology surveys followed current good practice and survey guidance at the time of survey and were undertaken between 2022 and 2025. An assessment of the impacts from the Project was included in ES Chapter 8 Terrestrial and

Reference	Theme	Issue raised	The Applicant's response
			freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) and details regarding habitat reinstatement are provided in the Outline LEMP (Document reference 7.5, DCO Volume 7, Version 1). Further pre-construction surveys will be undertaken to confirm and update the ecological baseline, as secured in the Outline CEMP – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1).
RR-316-19	Land quality and ground conditions	HISTORIC LANDFILL CONCERNS We understand from our neighbours that some of the land was used for uncontrolled landfill during the previous century. Disturbance of historic landfill material could create environmental hazards. As far as we are aware, no soil sampling or contamination assessment has been undertaken which is a serious and unaddressed potential risk.	The Applicant notes the concerns of Mr Potts with regards to the installation of the pipelines between the Water Recycling Plant (WRP) site and Otterbourne Water Supply Works, specifically where it passes through Bugle Farm landfill (located at the intersection of Sections L and M of the pipeline). Project specific ground investigations have been undertaken along the route of Sections L and M, including within the footprint of Bugle Farm landfill. As part of the ground investigation soil and groundwater samples were collected and sent for laboratory analysis. A summary of the results of the ground investigation is provided within ES Appendix 11.2 Geotechnical and geo-environmental reports ([APP-152] for document 2 of 18 documents) with additional detail provided within ES Appendix 11.2 Geotechnical and geo-environmental reports (Document reference 6.2, DCO Volume 6, Version 1 – for document 10 of 18 documents). In order to mitigate potential impacts to the River Itchen, trenchless techniques are to be utilised to cross under the river which is located in Section M of the pipelines between the WRP site and Otterbourne Water Supply Works. The length of the route where trenchless techniques are adopted will result in the techniques also being used to cross under Bugle Farm landfill. Due to the route being advanced via a trenchless technique under Bugle Farm Landfill through what is assumed to be natural soils, it is unlikely that landfill material will be excavated. An Outline Foundation Works Risk Assessment [APP-417] has been prepared for the Project, which also includes the section of the pipeline that crosses under Bugle Farm landfill. The purpose of the Outline Foundation Works Risk Assessment (FWRA) [APP-417] is to demonstrate that the construction of the shafts and tunnels required for the Project would not have an adverse environmental impact by creating new pathways for the migration of contamination, considering the protection of water resources, ecological receptors and human health. As outlined in environmental measure LQGC8 in Table 5-1 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), a detailed FWRA will be undertaken post consent and in line with CL:AIRE's Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention (CL:AIRE, 2025). The objectives of the detailed FWRAs will be to mitigate risk of release of contaminated water/ leachate into watercourses/ groundwater and to reduce the potential increase in ground gas risk via the creation of preferential pathways due to the adopted construction methodologies.

Reference	Theme	Issue raised	The Applicant's response
RR-316-20	Location of the proposed pipeline routes	REMEDIES We ask that the Applicant and decision-makers address the concerns and impacts expressed in this representation through the following remedies: Remove the occupied fields adjacent to Highbridge Road, SO50 6HQ, from the proposed pipeline route and construction compound limits. Reroute the pipeline to avoid the fields entirely or provide a full route-options assessment demonstrating why avoidance is not possible.	The construction compound will support the construction of two trenchless sections of the Pipeline: one to the east to cross an upstream tributary of the River Itchen, and the other to the west to cross the River Itchen itself. The Applicant undertook a route selection process to determine the route for this pipeline, as set out in section 5.11 of the Scheme Development Report – 1 of 3 documents [APP-073]. This field was selected as a construction compound location, as it aligned with the proposed route for the trenchless crossing of the River Itchen, it had limited ecological value and offered the opportunity for access from Highbridge Road (B3335). The Applicant considered a construction compound to the west of Highbridge Road (B3335), however all potential options were either heavily vegetated or wooded, within flood zones, or comprised of marshy habitat with ecological value. It was therefore determined that the construction compound should be located to the east of Highbridge Road (B3335) to avoid these impacts and risks.
RR-316-21	Construction compound locations	Relocate the proposed construction compound to a less sensitive and more appropriate site, preferably land that is not in active equine or agricultural use and is better suited to heavy construction access. Provide a clear and evidence-based justification for any residual land take affecting these fields, including why the compound is needed at this location.	See response RR-316-20, which sets out that this is the most optimal site given the absence of environmental sensitivities that are present on sites in the surrounding area.
RR-316-22	Terrestrial and freshwater biodiversity	Undertake independent assessments of equine welfare, ecology, biodiversity, protected species, soil structure, drainage, access safety, traffic impacts, and potential historic contamination before any final decision is made.	The Applicant acknowledges the importance of undertaking accurate baseline surveys and assessments. Ecology surveys undertaken followed current good practice and survey guidance at the time of survey and were undertaken between 2022 and 2025. An assessment of the ecological impacts from the Project is included in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) and survey methodologies are provided in the relevant ES Appendices [APP-127, APP-128, APP-129, APP-130, APP-131, APP-132, APP-133, APP-134 and APP-135]. ES Appendix 12.1 Agricultural Land Quality [APP-169] identifies and characterises seven soil types throughout the Order Limits based on the analysis of 90 soil samples, which included an evaluation of soil physical properties such as structure. Due to the temporary, short-term and very localised nature of disturbance to soils for the installation of the pipeline, a detailed pre-construction survey was not undertaken. The Outline Soil Resource Management Plan (SRMP) provided in Appendix B of the Outline Construction Environmental Management Plan (CEMP; 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1)) notes at paragraph B.2.16 that the Agricultural Liaison Officer will be appointed and will be responsible for undertaking and preparing a Record of Condition to capture

Reference	Theme	Issue raised	The Applicant's response
			the condition of the land prior to commencement of construction, as well as for coordinating surveys of agricultural drainage, and ensuring landowners, occupiers and their agents are consulted in respect of requirements for field entrances and crossing points across the construction working width, particularly to severed land parcels. ES Chapter 18 Traffic and transport [APP-097] provides an assessment of the potential impacts arising from the Project. Construction traffic will be controlled via the Framework Construction Traffic Management Plan [APP-415]. ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) provides the assessment for potential effects arising from the Project on the water environment and considers construction drainage which will be controlled via measures secured within the Outline CEMP – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1), such as WE4 which requires the Contractor to prepare a Construction Drainage Plan to manage the quality and quantity of construction stage drainage. ES Chapter 11 Land quality and ground conditions provides the assessment for potential contamination arising as a result of the Project and similarly the potential for contamination risks arising during construction are secured via the Outline CEMP, including measure LQGC6 which requires the Contractor to prepare a plan for dealing with unforeseen contamination. Although equine welfare is not considered as a specific receptor in the ES assessment, potential impacts to equestrian centres are assessed within ES Chapter 12 Land use and agriculture [APP-091]. The Outline Soil Resource Management Plan, Appendix B to the Outline CEMP – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1) confirms that an Agricultural Liaison Officer will be appointed as the primary contact for ongoing engagement with landowners, their agents and occupiers of the land about practical agricultural matters, including consultation in respect of timing of works and existing farming regimes. All construction works will be undertaken in line with the Outline CEMP – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1) which secures good practice measures to control noise that may be generated. Following construction all temporarily impacted habitats will be reinstated to their pre-construction habitat type and condition secured by the Outline LEMP (Document reference 7.5, DCO Volume 7, Version 1).
RR-316-23	Landowner engagement	If any works remain proposed on the land, provide enforceable mitigation, compensation, reinstatement, monitoring and aftercare commitments sufficient to return the land to safe, uncontaminated, well-drained and horse-suitable grazing use.	As detailed in ES Chapter 3 Description of the Proposed Development [APP-082] following construction, ground levels where construction of the pipelines and other temporary works are undertaken would be reinstated. An access cover will be retained at the location of the tunnel shaft to provide access for maintenance and repair during the operational phase. Further details regarding the tunnel shaft location and access cover requirements will be provided following the detailed design. The Applicant confirms that the respondent may be entitled to claim compensation for crop loss and disturbance losses arising out of the temporary

Reference	Theme	Issue raised	The Applicant's response
			use of the land for construction of the Project, in line with the compensation code. The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the occupied land in the existing manner but confirms that alternative arrangements will be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. The Applicant confirms that soils will be managed and reinstated in accordance with the Outline Soil Resource Management Plan located within Appendix B of the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3).

Table 2-55 The Applicant's response to RR-318 from Ian Judd and Partners on behalf of Steven Gregory

Reference	Theme	Issue raised	The Applicant's response
RR-318-1	Greeting	Please see attached. Name of Interest party: Steven Thomas Gregory Business Name: J & ST Gregory Address: [REDACTED] Email Address: [REDACTED] Telephone Number: [REDACTED]	The Applicant notes this comment.
RR-318-2	Landowner engagement	Name & Address of Property Affected: Tangier Lane Land Plan Reference No: 19-001 Area of Acquisition Rights requested on land owned: 30422 square metres - 3.04ha - 7.52acres Linear length of pipe: 600m Use of Land: Improved Grass Lays- Beef Farming Interest Parties on my land: Farmed In-hand Land Agent Instructed: Ian Judd and Partners, 4 High Street, Bishops Waltham, Southampton, Hampshire, SO32 1AB - 01489 896422 @ianjuddandpartners.co.uk	The Applicant notes this response.
RR-318-3	Principle of development	2. Summary of Submission 2.1. I wish to become an interested party and submit my strongest objection to this Development Consent Order Application. 2.2. This relevant representation refers to land in my ownership only, I am also the tenant and occupier of several other parcels affected by the scheme.	The Applicant has noted this comment. The Applicant has undertaken diligent inquiry to obtain the details of persons with an interest in the Order Limits, as summarised in the Consultation Report [APP-029] Section 9.3.17 to 9.3.30. As part of this process Land Interest Questionnaires (LIQs) were issued to the respondent ahead of the Summer 2024 Consultation to assist the respondent in identifying themselves,

Reference	Theme	Issue raised	The Applicant's response
			confirming contact details and clarifying land ownership, occupation, tenancy arrangements and any other interests in land, including rights of way and option agreements. The LIQs also sought to confirm that land ownership and occupation boundaries were correctly identified. The Applicant did not receive a response to these LIQs from the respondent despite reminder letters being sent. The Applicant then issued the respondent a Confirmation Schedule in October 2025, which summarised the Applicant's understanding of the respondent's interest in land relevant to the Project. The Applicant sought a response to confirm whether the information held was correct, however the no response was provided despite a further reminder letter being issued in December 2025. The Applicant welcomes engagement from the respondent and their land agent regarding their tenancy and occupation of other parcels and will update the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1) accordingly with any necessary amendments.
RR-318-4	Land use and agriculture	3.Summary of Land Use 3.1. The scheme is going to affect 7.52 acres of land that I own. This will have a significant impact on my ability to farm at Tangier Farm.	The Applicant acknowledges the concern that the temporary use of land required for the Project could affect farming operations at Tangier Farm. The likely effects of the Project on agricultural land and farm holdings are assessed in section 12.8 of Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091]. The assessment recognises that agricultural land would be temporarily required during construction, during which time land within the Order Limits would be taken out of agricultural production and use. Following installation and completion of construction, the land would be restored to its pre-existing agricultural use, as set out in the Outline Soil Resource Management Plan (SRMP) appended to the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) [APP-413] and [APP-414] for documents 2 and 3). The assessment also considers temporary impacts on agricultural land use, including disruption to access, drainage systems and field severance. Commitments secured through the Outline CEMP(Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) [APP-413] and [APP-414] for documents 2 and 3, include maintaining access to farm tracks and providing private farm access across the open-cut pipeline during construction where required and reasonably practicable. Given the short-term and temporary nature of the pipeline installation, ES Chapter 12 Land use and agriculture [APP-091] concludes that it is not anticipated there would be any likely significant effects arising from ongoing farm viability issues that cannot be resolved through mitigation measures, ongoing discussion and negotiation.
RR-318-5	Land use and agriculture	4.Impact on Business 4.1. I operate a beef enterprise, producing single suckled beef cattle from birth to finishing, as well as finishing beef store cattle. I keep around 600 head of	The Outline Soil Resources Management Plan (SRMP), provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3), sets out

Reference	Theme	Issue raised	The Applicant's response
		cattle, fed on maize and grass silage, with concentrates. 4.2. The field affected by the scheme is my home field which I usually use for calving beef cows. Calving time is the most stressful period for a cow. The additional impact of the scheme on the cattle will impact their growth. 4.3. The loss of the grassland will limit the number of cattle I can keep and will have a significant effect on my business profitability.	the scope of the Agricultural Liaison Officer (ALO) to be appointed for the Project. The role includes the undertaking of pre-construction liaison with landowners, occupiers and their agents to reduce disruption, where practicable, to existing farming regimes and timings of activities. The Applicant notes the importance of the affected field to the operation of the holding and the management of livestock. The Outline SRMP, contained within Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), notes that reinstatement of soils over the pipeline will be undertaken as soon as practicable following installation and that the timing and management of reinstatement will be agreed with the landowner. Disruption to agricultural land and agricultural activities will be minimised where reasonably practicable. The timing of the construction works may allow for a grass sward to be established in time for grazing to resume following reinstatement. All soil handling will be subject to the best-practice measures set out in the Outline Soil Resources Management Plan, which will be further developed through the detailed SRMP. Risks to soil structure and drainage will be avoided or minimised and any defects identified following reinstatement will be appropriately remediated. Reasonable losses incurred by landowners arising out of the temporary use of land will be reimbursed in line with the Compensation Code.
RR-318-6	Landowner engagement	5. Southern Waters Conduct to date 5.1. We have been bitterly disappointed in Southern Waters conduct to date. They, via their agents have been rude, incompetent, and threatening at every encounter. 5.2. We took part in the public consultation in 2024 & 2025, yet our concerns have never been taken seriously and have never been addressed. The public consultations were just a formality that Southern Water gave lip-service to. 5.3. They have been most aggressive, constantly threatening court and legal action, if we do not allow access for surveys. They have entered any form of negation to allow surveys on our terms.	The Applicant does not recognise the accusations levelled at its approach to landowners. The Applicant confirms that consultation responses were received from the respondent at both the 2024 and 2025 consultation events. The Applicant wrote to the respondent on 9 December 2025 with a response to this feedback addressing the points raised by the respondent. Further information can also be found within the Consultation Report [APP-029]). During discussions with landowners, the Applicant has acted responsibly in making landowners aware of the statutory alternatives available should voluntary agreements not be reached. In relation to surveys, the use of statutory powers under Section 172 of the Housing and Planning Act 2016 has been referenced in correspondence to ensure the respondent is aware of the statutory powers available but confirms that these would only be relied upon following reasonable attempts to secure access by voluntary agreement.
RR-318-7	Landowner engagement	6. Need for Compulsory Purchase Powers 6.1. The Department for Communities and Local Government, Planning Act 2008, Guidance related to Procedures for the compulsory acquisition of land (CA Guidance), sets out the requirements Acquiring Authorities should meet to be granted CPO powers. 6.2. Para 6. "provides that a development consent order may only authorise compulsory acquisition if the Secretary of State is satisfied that: - the land is required for the development to which the consent relates, or is required to	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or

Reference	Theme	Issue raised	The Applicant's response
		facilitate, or is incidental to, the development,". 6.3. Para 8. "The applicant will also need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate"	• there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-318-8	Landowner engagement	6.4. Para 9. The applicant must have a clear idea of how they intend to use the land which it is proposed to acquire. 6.5. Para 11. Section 122 of the Planning Act sets out two conditions which must be met to the satisfaction of the Secretary of State before compulsory acquisition can be authorised. The first of these is related to the purpose for which compulsory acquisition is sought. These three purposes are set out in section 122(2): (i) the land is required for the development to which the development consent relates. For this to be met, the applicant should be able to demonstrate to the satisfaction of the Secretary of State that the land in question is needed for the development for which consent is sought. The Secretary of State will need to be satisfied that the land to be acquired is no more than is reasonably required for the purposes of the development. (ii) the land is required to facilitate or is incidental to the proposed development. An example might be the acquisition of land for the purposes of landscaping the project. In such a case the Secretary of State will need to be satisfied that the development could only be landscaped to a satisfactory standard if the land in question were to be compulsorily acquired, and that the land to be taken is no more than is reasonably necessary for that purpose, and that is proportionate.	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance. The Applicant's proposed use of the land is set out in the Works Plans [AS-008] with detail of each Works Number set out in 'Schedule 1 – Authorised Development' to the Draft Development Consent Order [APP-023]. The respondent is affected by 'Works No.4 – Pipeline between the WRP site and Otterbourne WSW' for which the Applicant is seeking the acquisition of rights as set out in Sheet 19 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2). The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.

Reference	Theme	Issue raised	The Applicant's response
RR-318-9	Location of the proposed pipeline routes	6.6. We believe that part of the land included within the order limits is not necessary to facilitate the scheme and the volume of land taken is not proportionate. 6.7. On our property the order limits extending to 7.52 acres for 600 linear meters of pipe, which equates to an average of 50m in width. 6.8. The Acquiring Authority have not provided any justification for the scale/quantum of the Order Limits. They have stated (Para 3.3.3 Document Reference 4.1) that the maximum working width is 40m. Yet later (para 3.3.1 Document Reference 4.1- please note numbering error in document) the working width may be up to 50m. 6.9. We understand that Southern Water have chosen not to undertake detailed design and want an element of flexibility, this flexibility could be reduced to 20m in width. It is clear that the scale of the Order Limits significantly more than is reasonably necessary or proportionate for a pipe that 1.4m in width.	The Order Limits provide flexibility for the works to be sited dependent on the position at the time of construction. This will be confirmed once the detailed design of the Project has been undertaken following approval of the DCO application. This approach ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs. The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline Construction Environment Management Plan [APP-412, APP-413, APP-414]. This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline Construction Environmental Management Plan [APP-412, APP-413, APP-414]. Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m for a maximum length of 42m.
RR-318-10	Location of the proposed pipeline routes	6.10. We believe the Order Limits should be significantly reduced to a maximum of 20m. If the Acquiring Authority require greater area for unnecessary offsite storage, they can rent commercially available space off site. 6.11. There is nothing within their submission that provides a justification for this excessive width of the order Limits.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide the necessary space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas, and enable safe and efficient construction operations. This is set out at paragraph 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. If part of the required construction storage were to be located off-site, this would significantly increase the duration of construction works and the number of construction vehicle movements on the highway network. Both of these factors would result in adverse impacts on the environment and local communities. The Applicant has provided detail in ES Chapter 3 Description of the Proposed Development [APP-082] regarding the compound requirements and as evidenced in the Statement of Reasons [APP-025], the Applicant considers that the land required for the Project has been justified. The Applicant has identified construction compounds along the pipeline route to facilitate direct access to the working area. This also reduces traffic impacts on the local road network and brings efficiencies with construction.
RR-318-11	Location of the proposed pipeline routes	7.Scale of the Working Area 7.1. The justification for the working width is lacking any reality, below is an exact Graphic 3-3 Para 3.5.92 document Reference 6.1.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, which is secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3)). This would provide the necessary space

Reference	Theme	Issue raised	The Applicant's response
			for a haul road, construction working areas, material storage areas, pipeline trench and soil storage areas. This is set out at section 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3)). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m, over a distance of a maximum of 42m. The haul road/working area must be a sufficient width to allow a suitably sized excavator to track back at 90 degrees to the pipe to lift it and then lower into the trench. A suitably sized excavator capable of carrying out a tandem lift of a string of pipes would circa 11m long hence the 11m required. The working area for the trench excavation is calculated using the width of the excavator capable of pipeline installation (circa 3.5m) and a 2m deviation of the pipeline route in each direction without compromising the pipelaying process. If the pipeline has to change direction the joints are designed to allow a slight angle deviation to alter the direction this is a gradual process and requires sufficient space to allow for it. Therefore, a total of 7.5m. The pipe storage/jointing area must be wide enough to allow the pipes to be welded together to form the strings before lowering into the trench. As there will be welders working on this while the excavator is operating a 1m safety exclusion zone has to be in place. The total of the pipe storage/jointing area is therefore a total of 3.5m The area required for topsoil storage is based on topsoil being 200mm thick, which equates to $8m^3$ for a 40m working width. With a side slope of 1:1 and maximum height of 1.8m an area of 7m has been allocated which includes for any bulking factor. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The area required for subsoil provides enough width in this area to segregate upper and lower subsoils, therefore there would be two separate mounds, which ensures the subsoil can be reinstated properly. A 1:1 side slope and a bulking factor has been incorporated which equates to 7m. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The above areas equate to a working width of 40m.
RR-318-12	Location of the proposed pipeline routes	7.2. This has a "Working Area and Haul Road" of 11m and a pipe trench 4m wide. This is excessive, yet only totals 15m in width. They want a further 25m for topsoil and subsoil storage.	See response to RR-318-11.

Reference	Theme	Issue raised	The Applicant's response
RR-318-13	Location of the proposed pipeline routes	7.3. I have undertaken a simple calculation of what may be needed as a working width - The Haul Road may be 3m wide, with occasional passing places, - Working area 8m, this allows 6m of digger working area, plus 2m pipe storage - Pipe width - this will be 1.5m plus say 1.5m each side of pipe = 4.5m - Topsoil Storage - A fair estimate is to assume 150mm of top soil, across 20m equates to 3m³ of top soil, stacked at 1:2, say 2.5m x 1.25m = 3.75m³, therefore 2.5m for topsoil storage. - Sub-soil Storage - If the trench is 4m wide and assume a depth of 2m (2.15m below ground level) deep 7.5m³ of subsoil, again assume 1:2 stack equates to 4m of subsoil storage. - Excess 2m excess for fencing and other uses - Total working area required - 24m in width	See response to RR-318-11.
RR-318-14	Location of the proposed pipeline routes	7.4. It is completely unjustified, unreasonable and unnecessary for the purpose, and disproportionate to permit a working area greater than 24m in width for open cut sections of pipe	See response to RR-318-11.
RR-318-15	Landowner engagement	7.5. If Southern Water wish to use additional space this can be done by agreement at a market rent with individual landowners.	The Applicant has been seeking voluntary agreements for all land identified for temporary use. Details of this engagement can be found within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1). As detailed within the Statement of Reasons [APP-025], temporary possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the project. Whilst the Applicant's preference is to reach a voluntary agreement, it considers that the temporary possession powers sought within the DCO are necessary to ensure that the project can be delivered where agreement cannot be reached. Reasonable losses incurred by landowners arising out of the temporary use of land will be reimbursed in line with the Compensation Code. The Applicant therefore considers that the temporary possession powers sought are justified and proportionate, whilst maintaining that a voluntary agreement remains its preferred outcome where possible.
RR-318-16	Location of the proposed pipeline routes	8. Scale of Easement Width 8.1. We haven't been provided any justification of the easement width restriction. Southern Water requested a 11m easement for open cut, being 5.5m each side of the pipe, with permanent restriction placed on this land. Yet	The purpose of the easement is to protect the integrity and operational requirements of the pipeline and to ensure appropriate access for inspection, maintenance, repair and replacement activities. The required width has been determined following a detailed technical assessment, taking account of the

Reference	Theme	Issue raised	The Applicant's response
		for tunnelled section the easement has been reduced to 2.5m each side of the pipe. 8.2. We have assessed other water providers easement width and the typical easement width for an 800mm pipe is 8m total width. 8.3. We have requested justification for this easement width; this hasn't been supplied. We therefore believe this is unreasonable, unjustified and disproportionate and should be reduced.	pipeline's diameter, depth, construction methodology, location and operational function. For sections of pipeline installed using open-cut construction, the Applicant is seeking an easement width of 11m (5.5m either side of the pipeline). This reflects the access and operational requirements associated with maintaining and, if necessary, excavating the pipeline in the future. Notably, this represents a reduction from the Applicant's published stand-off guidance for water mains of a comparable size and depth [1], which would typically require a wider protected corridor. This reduction from the normal requirement has been communicated to landowners and their agents where this is being challenged. For sections constructed using trenchless techniques, a reduced easement width is considered appropriate, taking into account depth, construction methodology and location. As the pipeline is installed at greater depth and future maintenance or operational access would be undertaken from either side of the trenchless section rather than directly above it, the same level of restriction is not required. The easement width has therefore been tailored to reflect the differing operational requirements of the construction methodologies. The Applicant is therefore satisfied that the easement widths proposed represent the minimum reasonably required to protect the pipeline and secure its safe operation over its lifetime. In accordance with the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition have been met. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits, whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) sets out the maximum diameter of the pipelines for the different Project components, which may be greater than the 800mm referenced by the Respondent. The Applicant considers the permanent rights sought are justified in order to protect and preserve the integrity of the Project.
RR-318-17	Archaeology and cultural heritage	9. Bishops Waltham Park Lug 9.1. The proposed pipeline runs adjacent to Bishops Waltham Park Lug, being the historic boundary, or park pale, of the medieval deer park associated with Bishop's Waltham Palace. It typically features an old wide earth bank and ditch structure. This historic feature is park of local history and should not be damaged by this scheme.	The Applicant notes this comment regarding the historical significance of Bishops Waltham Park Lug, and its proximity to the Project. The assessment of effects of the Project on Bishops Waltham Park is set out in paragraph 7.8.95 of ES Chapter 7 Archaeology and cultural heritage [APP-086]. The Park Lug would not be affected in this area as the order limits run parallel to the Lug and are offset by a minimum of 17m and the two crossings of the boundary of Bishop's Waltham Park would be carried out in areas where the Lug is less well-preserved, and disturbance would be minimised by localised reduction of working widths. Mitigation of any residual disturbance at

Reference	Theme	Issue raised	The Applicant's response
			these crossings would be achieved through archaeological investigation and recording in line with the provisions of the Outline Written Scheme of Investigation (Document reference 7.6, DCO Volume 7, Version 1).
RR-318-18	Landowner engagement	10. Private Negotiations and Alternative to Compulsory Purchase 10.1. We understand that it is not for the planning Inspectorate to comment on the terms of any private negotiated agreements. We must comment that Southern Water have been impossible to work with. They have dictated terms, without giving any consideration to amending the terms. The terms offered are significantly worse that those under compulsory acquisition. 10.2. They are only playing lip-service and have no intention of reaching any form of settlement with Landowners and Occupiers. This is apparent from the Preapplication Land and Rights Negotiation Tracker (Document 4.4) only 1 landowner has returned Heads of Terms out of 172 Category 1 Landowners. The one that has been returned is a middle section of a drill section, so no above ground access is needed. 0.58% sign up rate, clearly demonstrates that Southern Water have not made any significant effort to reach agreement with Landowners and Interested Parties and they are relying on taking land by compulsion. 10.3. Not a single Option Agreement have been entered into. 10.4. I believe it is disingenuous to categorize me as "Head of Terms negotiation ongoing" (yellow status). This is not true. Southern Water have shown no interest in reaching an agreement with us. I request that my status is amended to "Heads of Terms agreements unlikely before close of examination (red)".	The Applicant does not recognise the accusations levelled at its approach. The Applicant remains committed to working collaboratively with landowners and disagrees with respondent's suggestion that they have been unwilling to enter into any form of negotiations. The Applicant has made several amendments to the proposed Heads of Terms as confirmed by a relevant representation made by a member of the Land Agent Group [RR-233] and improved the commercial offer during the negotiations to demonstrate this preference. Whilst the Applicant would prefer to be able to advise the Examining Authority of a higher return of signed Heads of Terms, it does not consider this to be because the terms offered to the respondent are unreasonable. To date, despite formally requesting evidence demonstrating why the commercial offer is considered unreasonable on 28 January 2026, the Applicant is yet to receive a response. The Heads of Terms proposed by the Applicant closely align with those adopted across other utilities and infrastructure projects, which have also been reviewed and accepted by respective land agent groups. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with landowners regarding a voluntary agreement. The Applicant refutes the suggestion that it seeks to rely on statutory powers and confirms its preference to reach a voluntary agreement. The Applicant considers that the status recorded for the respondent by the Applicant in the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1) is correct given that Heads of Terms for a voluntary agreement have been issued and are being discussed with the respondent's representative. Following the Heads of Terms being issued on 6 March 2026, the Applicant discussed the Heads of Terms with the respondent's representative at a meeting on 13 May 2026. Following this, the Applicant requested a further meeting on 17 July 2026 and after issuing a proposal for revised terms on 7 August 2026 incorporating amended provisions and improved commercial terms, sought an additional meeting with the respondent's agent on 11 September 2026, evidencing the Applicant's attempts to reach a voluntary agreement. The Applicant most recently met on site with the respondent and their representative on 10 November 2026 to discuss their feedback further.

Reference	Theme	Issue raised	The Applicant's response
RR-318-19	Land use and agriculture	11. Land Quality and Water Logging 11.1. The soils comprise Wickham 3, a seasonally wet loam to clayey over shale with impeded drainage. 11.2. Our land can become very wet during the Winter, holding water for long periods. The soils are clayey, with impeded drainage. 11.3. We believe it will be impossible to work on the land for 4 to 5 months of the year, particularly when the top soil has been stripped and the subsoils compacted with heavy machinery. There is insufficient information within the applicant's submission as how they are going to deal with this issue. How they are going to stop soil erosion and water and sediment runoff to the local streams and ditches. 11.4. How can we the landowner stop the contactors if the ground conditions become detrimental to work in.	The Applicant confirms in Environmental Statement (ES) Appendix 12.1 Agricultural Land Quality [APP-169] that seasonally wet soils of the Wickham 3 association soils are identified in the Order Limits. The Outline Soil Resources Management Plan (SRMP), as contained in Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), acknowledges that the main adverse impacts on soils during construction occur as a result of handling in inappropriate conditions, notably when the soils are too wet. Paragraphs B.9.1 to B.9.14 of the Outline SRMP set out the methods for determining appropriate soil handling conditions and criteria for when soil handling may or may not take place, and specify that soil handling should only take place in suitable soil moisture and weather conditions. The Outline SRMP, contained within Appendix B of the Outline CEMP – (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), also includes measures relating to the handling, storage and reinstatement of soils to minimise the risk of soil erosion and sediment runoff during construction. Soil handling activities will only take place where the required soil moisture and weather criteria are met, thereby reducing the risk of damage to soil structure and drainage.

Table 2-56 The Applicant's response to RR-319 from Ian Judd and Partners on behalf of Steven John Gamblin

Reference	Theme	Issue raised	The Applicant's response
RR-319-1	Greeting	Please see email for relevant Representation.	The Applicant notes this comment.
RR-319-2	Need case	Comments on potential wastewater pipeline route The need to make more efficient use, and reuse, of water resource in the UK is clearly an important priority.	The Applicant notes and welcomes this comment.
RR-319-3	Land use and agriculture	My comments are therefore made against the backdrop of supporting the overall objective, whilst seeking to limit adverse impacts on my land, and that of the adjacent plot (approximately to the west of my land running up to Sandy Lane) owned by my sister- Stella Gamblin. Additionally, I will comment on my interest in minimising negative impact on the quality and utility of my land at 'Eight Acres' to the south of the Sandy Lane plot.	The Applicant notes and welcomes this comment supporting the objective of the Project. Impacts on land are minimised through the provisions of the Outline Soil Resource Management Plan (SRMP), secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), requires soils to be stripped, stored, handled and reinstated in accordance with good practice, with topsoil and subsoil generally stored separately and replaced in their original sequence and location. The objective is to reinstate land so that it can continue to perform the same functions as prior to construction. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) also includes commitments to maintain access where

Reference	Theme	Issue raised	The Applicant's response
			reasonably practicable, provide additional access points where feasible, and engage with landowners throughout construction. The Applicant will continue to engage with affected landowners regarding detailed construction arrangements and land reinstatement requirements.
RR-319-4	Location of the proposed pipeline routes	My interests, and those of my sister (who will make her own submission) in both the short, medium and long-term, are best accommodated by the pipe route being at the eastern edge of my 'Sandy Lane' plot along the boundary with the adjacent plot owned by my cousins (which was my earlier understanding of the proposed route). Firstly, such a location will reduce the impact on my sister's house and garden, particularly with respect to the quality of the environment during the construction phase and to minimise negative impacts on the specimen trees planted by us, with our late father, over the last 30 years. We have expended a lot of effort over a long period to enhance the quality of the garden environment and would seek to minimise negative impact.	The Applicant notes the preference for the pipeline to be routed along the eastern boundary of the Sandy Lane plot in order to reduce effects on neighbouring residential amenity, trees, future development opportunities and land use. As set out in ES Chapter 12 Land use and agriculture [APP-091], the Project has been designed to avoid settlements, commercial property and land, major housing allocations and Best and Most Versatile agricultural land where reasonably practicable to reduce the risk of disruption to land use and agriculture. The Applicant also notes the concerns regarding the protection of specimen trees, residential amenity and the future use and development potential of the land. Effects on trees and woodland are assessed in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1), whilst the assessment of effects on development land and future sterilisation of development opportunities is reported in ES Chapter 12 Land use and agriculture [APP-091]. The figure provided by the Respondent does not show the full extent of the Order Limits as shown on Sheet 17 of the Works Plans – 2 of 3 documents [AS-008]. Sheet 17 shows that there is flexibility for the Pipeline to be located further east, as requested by the Respondent. Additionally, the provided figure shows a pipeline route within the Order Limits. The Applicant is not committing to a specific location for the Pipeline at this stage. This will be determined at the detailed design stage following approval of the DCO application. In summary, the Limits of Deviation for the Pipeline as shown on Sheet 17 of the Works Plans – 2 of 3 documents [AS-008] provides the requested flexibility. The Applicant has had regard to feedback received from landowners in this location and has considered the potential for alternative routes. An alternative route further to the north would not be practicable due to residential properties forming part of Wickham along Little Bull Lane and Sandy Lane. An alternative route further south would result in a far greater loss of vegetation due to the presence of areas of woodland.
RR-319-5	Location of the proposed pipeline routes	Secondly, in the longer-term, the alternative, more easterly route, will be less detrimental to the development opportunity for my 'Sandy Lane' parcel because of the necessary restrictions on land use above, and adjacent to, the pipeline. Sharing this restricted corridor between my plot and the adjacent one to the east, will mean that both plots can be developed in the future with manageable restraints.	The alternative highlighted by the Respondent is located within the Order Limits and Limits of Deviation for the Pipeline. The figure provided by the Respondent does not show the full extent of the Order Limits as shown on Sheet 17 of the Works Plans – 2 of 3 documents [AS-008]. Sheet 17 shows that there is flexibility for the Pipeline to be located further east, as requested by the Respondent.

Reference	Theme	Issue raised	The Applicant's response
RR-319-6	Land use and agriculture	In addition to the specific routing of the pipeline, I wish also to comment on the need to return the land to something approximating to its current quality and condition after the construction work is finished. To do this will require a detailed condition survey of the land currently, not just top soil quality but also intermediate and sub-soil conditions of compaction, drainage etc, so that there is a shared understanding of what an adequate outcome is. I will also seek binding commitment to an agreed methodology to return the land to its original condition. The 'top' half of my Sandy Lane plot is used for growing produce which contributes substantially to the amenity value of the land. My plan is to expand the use of all of my landholding for agriculture/amenity purposes which will likewise require a good level of making good to the land after pipeline construction.	Environmental Statement (ES) Appendix 12.1 Agricultural Land Quality [APP-169] identifies and characterises seven soil types throughout the Order Limits based on the analysis of 90 soil samples. Due to the temporary, short-term and very localised nature of disturbance to soils for the installation of the pipeline, a detailed pre-construction survey was not undertaken. However, the Outline Soil Resources Management Plan (SRMP), provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) notes at paragraph B.2.16 that the Agricultural Liaison Officer (ALO) will be responsible for undertaking and preparing a Record of Condition to capture the condition of the land prior to commencement of construction. All soil handling will be subject to the best practice measures set out in the Outline SRMP, to be further developed in the detailed SRMP. Risks to soil structure and soil drainage will be avoided or minimised, and any defects identified post-construction will be ameliorated such that the original land quality will be achieved, as noted in paragraph B.4.3 of the Outline SRMP. The provisions of the SRMP are secured by Requirement 6 in Schedule 2 to the Draft DCO [APP-023] which states that the detailed CEMP must be in substantial accordance with the Outline CEMP.
RR-319-7	Land use and agriculture	With respect to my land called 'Eight Acres', I likewise want to register the importance of returning the land to its original condition, post construction.	The Applicant notes this comment and refers to the response to RR-319-7.
RR-319-8	Location of the proposed pipeline routes	Also, as much as feasible, to route the pipeline as far to the east side of field as possible to minimise both disruption to the land and to have the least impact on longer-term development potential. Additionally, in the southeast corner of the field, my father and I planted ca 100 oak trees about 25 years ago, which are subject to a protection order (not initiated by me). As far as I understand, the proposed pipeline route need not approach this woodland area but, it would be important to minimise any deleterious effects on this plantation by issues such as changing the water table for example.	The alternative highlighted by the Respondent is located within the Order Limits and Limits of Deviation for the Pipeline. The figure provided by the Respondent does not show the full extent of the Order Limits as shown on Sheet 17 of the Works Plans – 2 of 3 documents [AS-008]. Sheet 17 shows that there is flexibility for the Pipeline to be located further east, as requested by the Respondent. The Applicant understands the trees referred to are located south of Plots 16-060 and 16-059 as shown on Sheet 17 of the Land Plans – 2 of 3 documents (AS-005). Construction works will not directly impact this woodland, nor is it anticipated there would be any impact on the groundwater table in this location.
RR-319-9	Land quality and ground conditions	I suspect having to lay a pipe through a 1970's landfill site wouldn't be any engineer's preferred option but, there is probably precedent and peer-reviewed literature to inform on risk and remediation. From my point of view, and that of my sister, [REDACTED] the key thing is that there is clear information (probably including Method Statements) about the contaminants that could be found, what the possible mechanisms of spread of these agents could be (eg air- or water-borne) and, crucially, how these risks would be managed so as not to impact on the environment and amenity of our property	The Applicant notes the concerns of Mr Gamblin and his sister with regards to the installation of the pipelines between the Water Recycling Plant (WRP) site and Otterbourne Water Supply Works (WSW), specifically where it passes through Ash House Farm landfill (located within Section J of the pipeline). Project specific ground investigations have been undertaken along the route of Section J, including within the footprint of Ash House Farm landfill. As part of the ground investigation soil, soil leachate and groundwater samples were collected and sent for laboratory analysis. A summary of the results of the

Reference	Theme	Issue raised	The Applicant's response
			ground investigation within Section J, including the contaminants identified, is provided within paragraphs 11.7.167 – 11.7.174 and 11.7-215 – 11.7.219 of ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1) with further details provided within ES Appendix 11.2 Geotechnical and geo-environmental reports ([APP-157] for document 7 of 18 documents). Additional ground investigations were recommended within ES Appendix 11.2 Geotechnical and geo-environmental reports ([APP-157] for document 7 of 18 documents) for this section of the pipelines between the WRP site and Otterbourne WSW to further assess the ground conditions local to where the open cut construction will be undertaken. The potential pathways for which contamination associated with Ash House Farm landfill, the source, may migrate and impact upon land quality and ground conditions receptors are outlined in Table 11-46 (Section J) of ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1). Table 11-46 (Section J) also includes example mitigation measures to reduce the potential impacts associated with Ash House Farm landfill. These mitigation measures include the development and adherence to risk assessments and method statements protective of human health, the environment and controlled waters (groundwater and surface waters) which are secured via the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). Details of Project wide primary and tertiary mitigation measures that are protective of land quality and ground conditions receptors, including for example the development of remediation strategies for areas which are considered to represent a potentially unacceptable risk to land quality and ground conditions receptors, are discussed within section 11.4 of the ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1). An assessment of potential impacts on land quality and ground conditions receptors as a result of construction activities along the route of pipelines between the WRP site and Otterbourne WSW, inclusive of Section J and Ash House Farm landfill, is provided within paragraphs 11.8-176 – 11.8.187. The assessment concluded that, with the implementation of mitigation measures (as highlighted above), there would be no significant effects to land quality and ground conditions receptors along the route of pipelines between the WRP site and Otterbourne WSW as a result of the Project.

Table 2-57 The Applicant's response to RR-320 from Steven Mason

Reference	Theme	Issue raised	The Applicant's response
RR-320-1	Location of the proposed pipeline routes	Clearer definition of route required	The pipelines would be located within Work No. 2, Work No. 3 and Work No. 4 as shown on the Works Plans [AS-007, AS-008, APP-014].

Table 2-58 The Applicant's response to RR-322 from Ian Judd and Partners on behalf of Stuart Houghton & Julian Houghton T/A T R Houghton & Sons

Reference	Theme	Issue raised	The Applicant's response
RR-322-1	Greeting	Please see support email Relevant Representation Prepared on Behalf of Stuart Houghton & Julian Houghton In Relation to Hampshire Water Transfer and Water Recycling Project	The Applicant notes this comment.
RR-322-2	Landowner engagement	1. Key Information Name of Interest party: Stuart Houghton & Julian Houghton Business Name : T R Houghton & Sons Address: [REDACTED] Email Address: [REDACTED] Telephone Number: [REDACTED] Name & Address of Property Affected : Blind Lanel, Wickham Park Golf Course, Titchfield Lane Land Plan Reference No: 13-010 13-032 13-034 13-035 13-037 13-038 13-039 13-040 13-041 13-042 13-043 14-001 14-002 14-003 14-004 14-005 14-006 14-007	The Applicant notes this comment.

Reference	Theme	Issue raised	The Applicant's response
		14-008 14-009a 14-009b 14-010 14-011 14-012 14-013 14-014 15-004 15-006 15-009 15-010 15-011 15-012 15-013 Area of Acquisition Rights requested : 154 square metres 6197 square metres 1729 square metres 527 square metres 12 square metres 42 square metres 1133 square metres 9408 square metres 121661 square metres 6681 square metres 530 square metres 359 square metres 8332 square metres 354 square metres 27 square metres 7 square metres 29633 square metres	

Reference	Theme	Issue raised	The Applicant's response
		19607 square metres 9674 square metres 476 square metres 9332 square metres Total " 225,875m2 Area of Temporary Rights Requested : 2410 square metres 4590 square metres 828 square metres 117569 square metres 8 square metres 5 square metres 6108 square metres 9231 square metres 1848 square metres 41 square metres 24777 square metres 316 square metres Total 167,758m2 Linear length of pipe : 810m Use of Land: Solar Farm, Arable land, Commercial Property, Agricultural property, Golf Course. Interest Parties on my land: Crown Golf Bloor Homes Ltd Conrad Energy J & ST Gregory Numerous Commercial Tenants at Park Place Farmyard Land Agent Instructed: Ian Judd and Partners, 4 High Street, Bishops Waltham, Southampton, Hampshire, SO32 1AB" @ianjuddandpartners.co.uk	
RR-322-3	Principle of development	2. Summary of Submission 2.1. I wish to become an interested party and submit my strongest objection to this Development Consent Order Application.	The Applicant has noted this comment.

Reference	Theme	Issue raised	The Applicant's response
RR-322-4	Landowner engagement	2.2. We have a lot of land affected by the scheme.	The Applicant confirms that the respondent has a number of land interests listed within the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1).
RR-322-5	Landowner engagement	2.3. Our principal objection is permanent rights of access over the access route into Park Place Farm.	The Applicant notes this comment relates to plots 14-009a and 14-009b shown on Sheet 14 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2) of which the respondent is the freehold owner and are used by tenant occupiers of their yard for access off Titchfield Lane. The Applicant's proposed use of the plots is a permanent operation and maintenance access as shown on Sheet 14 of the Works Plans [AS-008] in Works No.8. The Applicant welcomes further engagement with the respondent to discuss their objection.
RR-322-6	Land use and agriculture	2.4. We have significant concerns regarding impact on the golf club and golf clubs' viability during the construction period.	The Applicant acknowledges the concerns raised regarding the potential effects of the Project on the operation and viability of Wickham Park Golf Club during construction. The effects of the Project on recreational land uses are assessed in ES Chapter 12 Land use and agriculture [APP-091]. Construction of the Pipeline between the WRP site and Otterbourne WSW would require works within parts of Wickham Park Golf Club, including areas of the golf course and car park. The Order Limits for Section G retain optionality at the crossing of the River Meon and within Wickham Park Golf Club to take account of feedback received through engagement with the owners and operators of the Golf Club and to allow further refinement of the detailed design. As set out in Section 12.4 of ES Chapter 12 Land use and agriculture [APP-091], engagement with the Golf Club would continue post-consent to better understand operational requirements, inform the detailed design and construction methodology, and identify measures to reduce impacts on the Golf Club's operations, where reasonably practicable. Ongoing engagement with the Golf Club to inform detailed design and construction planning is secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), [APP-413] and [APP-414] for documents 2 and 3. Land required temporarily for construction would be reinstated to a similar pre-construction condition in accordance with industry standards, good practice and the specified construction methodology. Notwithstanding the proposed mitigation and ongoing engagement, ES Chapter 12 Land use and agriculture [APP-091] identifies the potential for adverse effects on Wickham Park Golf Club during construction. The Golf Club is assessed as a receptor of medium sensitivity due to its economic, social and recreational value. The magnitude of the impact would depend on the location of the land required and the duration of the effect but could be major as a reasonable worst case. This would result in a major adverse effect which is considered significant.

Reference	Theme	Issue raised	The Applicant's response
			The Contractor will continue to engage with Wickham Park Golf Club throughout detailed design and construction planning to identify measures to reduce disruption to the Golf Club's operations and help minimise effects on its continued operation during construction, where reasonably practicable.
RR-322-7	Cumulative effects	2.5. We are concerned by the impact on the solar farm and the development potential of the land south of Blind Lane.	The Applicant is aware of the solar farm development that is being progressed by Conrad Energy to the north of Blind Lane and Titchfield Lane. The Applicant will continue to engage with the Conrad Energy to determine how the Project can be developed alongside the solar development. Regarding the proposed development south of Blind Lane, the Applicant has considered the potential for land to become developed and has amended the design of the Project where it intersects with land that is allocated in an adopted or emerging local plan, and where there is a live or approved planning application. The Applicant has confirmed that no planning application has been made at this site, and the site is not allocated for residential development in Winchester City Council (WCC) adopted or emerging local plan. Therefore, it would not be reasonable for the design of the Project to be impacted when there is no certainty that a development will come forward in this location. The Cumulative Effects Assessment (CEA) assess effects from the interrelationship between the Project with other developments. The solar farm project is considered in the CEA – it is identified by ID WCC PA 003 in Environmental Statement (ES) Appendix 20.1 List of 'other developments' - longlist and shortlist [APP-208]. Each environmental discipline that forms part of the Environmental Impact Assessment process considered whether the Project, when interacting with the solar farm project, has the potential to give rise to significant cumulative effects. The conclusion was there is not the potential to give rise to significant cumulative effects and therefore the solar farm project was not shortlisted and taken forward to the next stage of the CEA process.
RR-322-8	Landowner engagement	3. Summary of Land Use 3.1. We own 4 separate landholdings affected by the scheme. a) Land north of Blind Lane- Under Option to Conrad Energy, with Planning Approval for Solar Panels b) Land South of Blind Lane- Under Option to Bloor Homes, part allocated in Winchesters Local Plan c) Park Place Farm Buildings, yard and access track- Multiple commercial tenants and users d) Wickham Park Golf Course.	The Applicant confirms that the respondent has a number of land interests listed within the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1) and is aware of the details provided by the respondent. and is aware of the details provided by the respondent.
RR-322-9	Landowner engagement	3.2. A total of 22.59ha (55.82 acres) of permanent rights and 16.77ha (41.44 acres) of temporary rights are sought on our holdings. Our holding totals	The rights sought by the Applicant in respect of the land referred to by the respondent can be found within Schedule 5 of the Draft Development Consent

Reference	Theme	Issue raised	The Applicant's response
		112ha, Southern Water require rights on 35% of our land holding. This is unreasonable.	Order [APP-023] and shown on Sheet 14 and Sheet 15 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2). The respondent can also find details on the types of works to be undertaken on Sheet 14 and Sheet 15 of the Works Plans [AS-008]. As evidenced in the Statement of Reasons [APP-025], the Applicant considers that the land required for the scheme has been justified. The Applicant remains committed to working collaboratively with landowners and its clear preference is to secure voluntary agreements for access and the acquisition of land and rights wherever possible. As outlined in the Statement of Reasons [APP-025], the Applicant has sought to acquire the land and associated rights by voluntary agreement in order to facilitate delivery of the Project. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-322-10	Cumulative effects	4. Impact on Business 4.1. Land North of Blind Lane- Solar Farm- Conrad Energy 4.1.1. Planning has been approved by Winchester City Council for a solar farm on this land on 25/09/2025. Planning reference 24/02804/FUL. Works are due to commence in 2027 completion by 2030. Conrad Energy, the Option Holder, have the rights to a 40-year lease on the land. They have prepared a Relevant Representation highlighting the issues it will face by this scheme. The landowners will lose a large volume of rent as it will be unviable to return after the scheme to install additional panels.	The Applicant is aware of the solar farm development that is being progressed by Conrad Energy to the north of Blind Lane and Titchfield Lane. The Applicant will continue to engage with the Conrad Energy to determine how the Project can be developed alongside the solar development. The Cumulative Effects Assessment (CEA) assesses effects from the interrelationship between the Project with other developments. The solar farm project is considered in the CEA – it is identified by ID Winchester City Council (WCC) PA 003 in Environmental Statement (ES) Appendix 20.1 List of 'other developments' - longlist and shortlist [APP-208]. Each environmental discipline that forms part of the Environmental Impact Assessment (EIA) process considered whether the Project, when interacting with the solar farm project, has the potential to give rise to significant cumulative effects. The conclusion was there is not the potential to give rise to significant cumulative effects and therefore the solar farm project was not shortlisted and taken forward to the next stage of the CEA process. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of the Project, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-322-11	Cumulative effects	4.1.2. Land South of Blind Lane, under option to Bloor Homes, is being promoted for development, around 6 acres has been allocated for residential	The Applicant has considered the potential for land to become developed and has amended the design of the Project where it intersects with land that is

Reference	Theme	Issue raised	The Applicant's response
		development. The principal access would come from Blind Lane, however the Southern Water project would stop this.	allocated in an adopted or emerging local plan, and where there is a live or approved planning application. The Applicant has confirmed that no planning application has been made at this site, and the site is not allocated for residential development in Winchester City Councils (WCCs) adopted or emerging local plan. Therefore, it would not be reasonable for the design of the Project to be impacted when there is no certainty that a development will come forward in this location.
RR-322-12	Location of AGP	4.1.3. Units at Park Place Farm- These are all let for commercial uses. These will be adjacent to the proposed Pumping Station. This will have a significant impact on the use of the units. The principal concern is that Southern Water wish to use the access track as the only access to the pumping station post construction.	The Applicant proposes to use the existing access track from Titchfield Lane to access IPS-G (Work No. 5B) during the operation phase. Attendance by an operative at IPS-G (Work No. 5B) would only be required approximately once per week.
RR-322-13	Cumulative effects	4.1.4. Wickham Park Golf Couse- The Crown Golf, our tenants run Wickham Park Golf Club will be hugely disrupted by the scheme. This will impact the viability of the golf course and the rent we received. Crown Golf are also promoting part of the golf course for development. The scheme could have a detrimental impact on the development opportunity.	As set out in Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091], construction of the Project would result in temporary disruption to parts of Wickham Park Golf Club, including areas of the golf course and car parking. The Applicant has engaged with Wickham Park Golf Club to understand their operational requirements and has retained optionality in the alignment of the pipeline to help minimise impacts on the Golf Club. The Applicant will continue to proactively engage with the Golf Club post-consent to refine the detailed construction proposals in this area. During construction of the Project the effect on the Golf Club is assessed as a major adverse significant effect. The effect would be temporary in nature, i.e. during the construction of the Project, as post-construction land would be reinstated to a similar pre-construction condition in accordance with industry standards and good practice and in accordance with specified construction methodology, so that it can continue to perform the same functions as before. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of the Project, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-322-14	Landowner engagement	5. Southern Waters Conduct to date 5.1. We have been disappointed in Southern Waters conduct to date. Their communication has been woeful. They have been aggressive in their communication and strategy to force landowners towards the compulsory purchase process. We have tried working with them, but it has been very difficult to date.	The Applicant does not recognise the accusations levelled at its approach to landowners. The Applicant remains committed to working collaboratively with landowners and its clear preference is to secure voluntary agreements for access and the acquisition of land and rights wherever possible. As outlined in the Statement of Reasons [APP-025], the Applicant has sought to acquire the land and associated rights by voluntary agreement in order to facilitate delivery of the Project. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document

Reference	Theme	Issue raised	The Applicant's response
			reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with landowners regarding voluntary agreements and has continued discussions with landowners. Following a request by the respondent's representative, the Applicant recently issued updated Heads of Terms to the respondent on 11 September 2026 and undertook a site meeting on 20 October 2026 to discuss the respondent's feedback in further detail.
RR-322-15	Consultation	5.2. We took part in the public consultation in 2024 & 2025, yet our concerns have never been taken seriously and have never been addressed. The public consultations was just a formality that Southern Water gave lip-service to.	Section 47 of the PA 2008 is the duty of the Applicant to consult with the local community. The Consultation Report [APP-029] demonstrates conclusively that the Applicant has complied with the requirements of Section 47 of the PA 2008. This was also the view of all seven host local authorities when the Applicant consulted them in preparing the Adequacy of Consultation Milestone submission as part of the pre application procedure and subsequently confirmed through their Adequacy of Consultation Representations. The Planning Inspectorate concurred and the application has now been accepted. As well as undertaking statutory compliant consultations, the Applicant sought to carry out open, inclusive and proportionate pre-application consultation. The Applicant considered the Gunning Principles to make sure that consultation was fair, lawful and a worthwhile exercise for the Applicant and consultees, including landowners. Please see Table 3-1 in the Consultation Report [APP-029] for further detail about how the Applicant had regard to the Gunning Principles. Alongside formal consultation stages, the Applicant undertook ongoing engagement with landowners to inform refinements to the Project and the design of the AGP and pipeline routes. The Applicant has had regard to all feedback, which has informed the design of the Project. The Scheme Development Report [APP-073, APP-074, APP-075] and the Consultation Report [APP-029] set out the process that has been undertaken to design the Project and sets out how feedback from landowners and other stakeholders has been considered. Furthermore, following the Summer 2024 Consultation, the Statutory Consultations were largely focused on design changes that arose from considering feedback from landowners. The Applicant considered matters raised by landowners and reviewed whether alternative designs could mitigate these without introducing any new deliverability, environmental or land related risks or impacts. In the event that an alternative design would increase these risks or impacts, the alternative design may not have been progressed. A meeting with the landowner was held on 20 November 2026 to discuss heads of terms and the project generally.
RR-322-16	Landowner engagement	5.3. They have been most aggressive, constantly threatening court and legal action, if we do not allow access for surveys. They have entered any form of negation to allow surveys on our terms. It has been a struggle at every stage to work with Southern Water or their agents.	The Applicant does not recognise the accusations levelled at its approach to landowners. Where possible, access for surveys was agreed with landowners via voluntary access licences. An upfront payment was made to reflect any potential losses

Reference	Theme	Issue raised	The Applicant's response
			suffered as a result of the survey works, but landowners were able to make a claim if losses exceeded that initial payment. During discussions with landowners, the Applicant has acted responsibly in making landowners aware of the statutory alternatives available, should voluntary agreements not be reached. In relation to surveys, the use of statutory powers under Section 172 of the Housing and Planning Act 2016 has been referenced in correspondence to ensure the respondent is aware of the statutory powers available but confirmed that these would only be relied upon following reasonable attempts to secure access by voluntary agreement.
RR-322-17	Landowner engagement	6. Need for Compulsory Purchase Powers 6.1. The Department for Communities and Local Government, Planning Act 2008, Guidance related to Procedures for the compulsory acquisition of land (CA Guidance), sets out the requirements Acquiring Authorities should meet to be granted CPO powers.	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance.
RR-322-18	Landowner engagement	6.2. Para 6. "provides that a development consent order may only authorise compulsory acquisition if the Secretary of State is satisfied that: - the land is required for the development to which the consent relates, or is required to facilitate, or is incidental to, the development,".	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent and in accordance with the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition set out in Section 122 of the Planning Act 2008 have been met. Further detail can be found in sections 5 and 6 of the Statement of Reasons [APP-025].
RR-322-19	Landowner engagement	6.3. Para 8. The applicant will also need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate"	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance.
RR-322-20	Landowner engagement	6.4. Para 9. "The applicant must have a clear idea of how they intend to use the land which it is proposed to acquire.	The Applicant also refers to Sheet 14 and Sheet 15 of the Works Plans (AS-008) which show the types of works to be undertaken on the respondent's land

Reference	Theme	Issue raised	The Applicant's response
			to be considered with 'Schedule 1 – Authorised Development' of the Draft Development Consent Order [APP-023].
RR-322-21	Landowner engagement	6.5. Para 11. Section 122 of the Planning Act sets out two conditions which must be met to the satisfaction of the Secretary of State before compulsory acquisition can be authorised. The first of these is related to the purpose for which compulsory acquisition is sought. These three purposes are set out in section 122(2): (i) the land is required for the development to which the development consent relates. For this to be met, the applicant should be able to demonstrate to the satisfaction of the Secretary of State that the land in question is needed for the development for which consent is sought. The Secretary of State will need to be satisfied that the land to be acquired is no more than is reasonably required for the purposes of the development. (ii) the land is required to facilitate or is incidental to the proposed development. An example might be the acquisition of land for the purposes of landscaping the project. In such a case the Secretary of State will need to be satisfied that the development could only be landscaped to a satisfactory standard if the land in question were to be compulsorily acquired, and that the land to be taken is no more than is reasonably necessary for that purpose, and that is proportionate.	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance. The Applicant has included the minimum amount of land necessary to deliver the authorised development within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the authorised development.
RR-322-22	Location of the proposed pipeline routes	6.6. We believe that part of the land included within the order limits is not necessary to facilitate the scheme and the volume of land taken is not proportionate.	The Applicant has included the minimum amount of land necessary to deliver the authorised development within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the authorised development.
RR-322-23	Location of the proposed pipeline routes	6.7. On our property the order limits extending to 5.74 acres for 405 linear meters of pipe, which equates to an average of 57.35m in width, with a maximum width of around 85m.	The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-322-24	Location of the proposed pipeline routes	6.8. The Acquiring Authority have not provided any justification for the scale/quantum of the Order Limits. They have stated (Para 3.3.3 Document Reference 4.1) that the maximum working width is 40m. Yet later (para 3.3.1 Document Reference 4.1- please note numbering error in document) the working width may be up to 50m.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3)

Reference	Theme	Issue raised	The Applicant's response
			([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m for a maximum length of 42m.
RR-322-25	Location of the proposed pipeline routes	6.9. We understand that Southern Water have chosen not to undertake detailed design and want an element of flexibility, this flexibility could be reduced to 20m in width. It is clear that the scale of the Order Limits significantly more than is reasonably necessary or proportionate for a pipe that 1.4m in width.	The design of the Project as set out in the DCO application provides flexibility for refinement informed by further surveys and investigations at the detailed design stage. The detailed design will be developed following approval of the DCO application and the appointment of a Contractor. This approach ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs. The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m for a maximum length of 42m.
RR-322-26	Landowner engagement	6.10. We believe the Order Limits should be significantly reduced to a maximum of 20m. If the Acquiring Authority require greater area for unnecessary offsite storage, they can rent commercially available space off site.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m for a maximum length of 42m. If part of the required construction storage were to be located off-site, this would significantly increase the duration of construction works and the number of construction vehicle movements on the highway network.
RR-322-27	The draft DCO	6.11. There is nothing within their submission that provides a justification for this excessive width of the order Limits.	See above response for the justification for the extent of the Order Limits, which the Applicant considers to be appropriate and proportionate.

Reference	Theme	Issue raised	The Applicant's response
RR-322-28	Location of the proposed pipeline routes	7. Scale of the Working Area 7.1. We believe the Working Width is excessive, unjustified and should be reduced. The justification for the Working Width is lacking any reality what may be required for construction. Below is an extract Graphic 3-3 Para 3.5.92 document Reference 6.1. [GRAPHIC]	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, which is secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3)). This would provide the necessary space for a haul road, construction working areas, material storage areas, pipeline trench and soil storage areas. This is set out at section 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3)). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m, over a distance of a maximum of 42m. The haul road/working area must be a sufficient width to allow a suitably sized excavator to track back at 90 degrees to the pipe to lift it and then lower into the trench. A suitably sized excavator capable of carrying out a tandem lift of a string of pipes would circa 11m long hence the 11m required. The working area for the trench excavation is calculated using the width of the excavator capable of pipeline installation (circa 3.5m) and a 2m deviation of the pipeline route in each direction without compromising the pipelaying process. If the pipeline has to change direction the joints are designed to allow a slight angle deviation to alter the direction this is a gradual process and requires sufficient space to allow for it. Therefore, a total of 7.5m. The pipe storage/jointing area must be wide enough to allow the pipes to be welded together to form the strings before lowering into the trench. As there will be welders working on this while the excavator is operating a 1m safety exclusion zone has to be in place. The total of the pipe storage/jointing area is therefore a total of 3.5m The area required for topsoil storage is based on topsoil being 200mm thick, which equates to $8m^3$ for a 40m working width. With a side slope of 1:1 and maximum height of 1.8m an area of 7m has been allocated which includes for any bulking factor. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The area required for subsoil provides enough width in this area to segregate upper and lower subsoils, therefore there would be two separate mounds, which ensures the subsoil can be reinstated properly. A 1:1 side slope and a bulking factor has been incorporated which equates to 7m. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The above areas equate to a working width of 40m.

Reference	Theme	Issue raised	The Applicant's response
RR-322-29	Location of the proposed pipeline routes	7.2. This has a "Working Area and Haul Road" of 11m and a pipe trench 4m wide. This is excessive, yet only totals 15m in width. They want a further 25m for topsoil and subsoil storage, this is not necessary, reasonable or proportionate.	See response to RR-322-28.
RR-322-30	Location of the proposed pipeline routes	7.3. I have undertaken a simple calculation of what may be needed as a working width - The Haul Road may be 3m wide, with occasional passing places, - Working area 8m, this allows 6m of digger working area, plus 2m pipe storage - Pipe width - this will be 1.5m plus say 1.5m each side of pipe = 4.5m - Topsoil Storage - A fair estimate is assumed 150mm of top soil, across 20m equates to 3m³of top soil, stacked at 1:2, say 2.5m x 1.25m = 3.75m³, therefore 2.5m for topsoil storage. - Sub-soil Storage - If the trench is 4m wide and assume a depth of 2m (2.15m below ground level) deep 7.5m³ of subsoil, again assume 1:2 stack equates to 4m of subsoil storage. - Excess 2m excess for fencing and other uses - Total working area required - 24m in width	See response to RR-322-28.
RR-322-31	Location of the proposed pipeline routes	7.4. It is completely unjustified, unreasonable and unnecessary for the purpose, and disproportionate to permit a working area greater than 24m in width for open cut sections of pipe.	See response to RR-322-28.
RR-322-32	Landowner engagement	7.5. If Southern Water wish to use additional space this can be done by agreement at a market rent with individual landowners.	The Applicant has been seeking voluntary agreements for all land identified for temporary possession. Details of this engagement can be found within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1). As detailed within the Statement of Reasons [APP-025], temporary use possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the Project. Whilst the Applicant's preference is to reach a voluntary agreement, it considers that the temporary possession powers sought within the DCO are necessary to ensure that the Project can be delivered where agreement cannot be reached. Reasonable losses incurred by landowners arising out of the temporary use of land will be reimbursed in line with the Compensation Code.

Reference	Theme	Issue raised	The Applicant's response
			The Applicant therefore considers that the temporary possession powers sought are justified and proportionate, whilst maintaining that a voluntary agreement remains its preferred outcome where possible.
RR-322-33	Location of the proposed pipeline routes	8. Scale of Easement Width 8.1. We haven't been provided any justification of the easement width restriction. Southern Water requested a 11m easement for open cut, being 5.5m each side of the pipe, with permanent restriction place on this land. Yet for tunnelled section the easement has been reduced to 2.5m each side of the pipe.	The purpose of the easement is to protect the integrity and operational requirements of the pipeline and to ensure appropriate access for inspection, maintenance, repair and replacement activities. The required width has been determined following a detailed technical assessment, taking account of the pipeline's diameter, depth, construction methodology, location and operational function. For sections of pipeline installed using open-cut construction, the Applicant is seeking an easement width of 11m (5.5m either side of the pipeline). This reflects the access and operational requirements associated with maintaining and, if necessary, excavating the pipeline in the future. Notably, this represents a reduction from the Applicant's published stand-off guidance for water mains of a comparable size and depth [1], which would typically require a wider protected corridor. This reduction from the normal requirement has been communicated to landowners and their agents where this is being challenged. For sections constructed using trenchless techniques, a reduced easement width is considered appropriate, taking into account depth, construction methodology and location. As the pipeline is installed at greater depth and future maintenance or operational access would be undertaken from either side of the trenchless section rather than directly above it, the same level of restriction is not required. The easement width has therefore been tailored to reflect the differing operational requirements of the construction methodologies. The Applicant is therefore satisfied that the easement widths proposed represent the minimum reasonably required to protect the pipeline and secure its safe operation over its lifetime.
RR-322-34	Location of the proposed pipeline routes	8.2. We have assessed other water providers easement width and the typical easement width for an 800mm pipe is 8m total width.	See response to RR-322-33. In accordance with the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition have been met. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits, whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) sets out the maximum diameter of the pipelines for the different Project components, which may be greater than the 800mm referenced by the Respondent. The Applicant considers the permanent rights sought are justified in order to protect and preserve the integrity of the Project.

Reference	Theme	Issue raised	The Applicant's response
RR-322-35	Location of the proposed pipeline routes	8.3. We have requested justification for this easement width; this hasn't been supplied. We therefore believe this is unreasonable, unjustified and disproportionate and should be reduced.	See response to RR-322-33.
RR-322-36	Construction compound locations	9. Scale of Compounds 9.1. The scale of the Site Compound is unreasonable, 2ha for a site compound is vast and will be a significant visual impact during the construction.	Due to geographical restrictions determining trenchless construction techniques or limited direct access to the pipeline route, the Applicant proposes three temporary construction compounds on the land owned by the Respondent: • Construction compound G-7 located to the south of Titchfield Lane and west of Winchester Road (A334). This construction compound would support construction of the Pipeline from the River Meon to Titchfield Lane. The construction compound would also support trenchless construction under Winchester Road (A334). • Construction compound H-1 located to the east of Winchester Road (A334). This construction compound would support trenchless construction under Winchester Road (A334). • Construction compound H-2 located south of Blind Lane and west of Mill Lane. This construction compound would support construction of the Pipeline from Winchester Road (A334) to Shirrell Heath. The likely landscape and visual effects of the Project are assessed in ES Chapter 13÷ Landscape and visual [APP-092]. The assessment identifies significant landscape effects during construction associated with the temporary presence of the compounds and related construction activities. Following completion of the works, the compounds would be removed and the land reinstated in accordance with the Outline Landscape and Ecology Management Plan [APP-420]. While significant effects would remain at Year 1 of operation due to vegetation loss, effects would reduce over time as mitigation planting establishes. By year 15 of operation, residual landscape effects would not be significant.
RR-322-37	Construction compound locations	9.2. There is no justification why Southern Water cannot occupy a commercial yard, adjacent to major road network (M3 or M27) and store all of their equipment and pipes until they are needed on site.	If part of the required construction storage were to be located off-site, this would significantly increase the duration of construction works and the number of construction vehicle movements on the highway network. Both of these factors would result in adverse impacts on the environment and local communities.
RR-322-38	Construction compound locations	9.3. Graphic 3-11 in document reference 6.1, demonstrates a vast 2ha compound. [GRAPHIC] There is no justification for a compound of this scale.	Graphic 3-11 in ES Chapter 3 Description of the Proposed Development [APP-082] provides an indicative layout of a typical sectional site compound. ES Chapter 3 Description of the Proposed Development [APP-082] also explains that these construction compounds would comprise office buildings for up to approximately 20 construction employees, welfare facilities, parking spaces for approximately 50 vehicles, and storage areas.

Reference	Theme	Issue raised	The Applicant's response
RR-322-39	Construction compound locations	9.4. There is no need to have 40m x 100m of pipe storage at each compound. If the pipes were stacked 4 high, assuming each pipe is 8m in lengths with 100mm between pipes. This would be enough room to stack 2000 lengths of pipe or 16km of pipe per compound. If this is the case only 3 compounds are needed on the scheme.	Within the construction compound, pipes would be stored in a way that allows for efficient and safe access. Other material will also need to be stored in the construction compounds. Detail on the construction compounds is outlined in ES Chapter 3 Description of the Proposed Development [APP-082] under section 3.5.129 onwards. Graphic 3-11 highlights the amount of storage necessary for pipelines which shows 5No. 14m x 26m storage areas for both pipelines and fittings. Whilst this indicative plan represents a typical construction compound, individual compound construction and design will be refined further in later design stages for discrete construction locations. If part of the required construction storage were to be located off-site, this would significantly increase the duration of construction works and the number of construction vehicle movements on the highway network. Both of these factors would result in adverse impacts on the environment and local communities. As per preliminary design principle PDP_1 (see the Design Approach Document 1 of 3 documents [APP-077]), the Applicant has taken the approach to minimise land take, whilst ensuring sufficient space and access for efficient construction and operation, through route and site selection and optimising site layouts. The Scheme Development Report - 1 of 3 documents [APP-073], section 5.10, sets out the process undertaken to identify and assess compound locations, including the consideration of topography, ground conditions, and existing land uses. The suitability of each compound site has been reviewed in consultation with technical specialists, and mitigation measures will be incorporated where necessary to ensure safe and stable construction. Further, Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3), which sets out the measures that will be implemented to avoid and reduce environmental impacts, including to vegetation.
RR-322-40	Construction compound locations	9.5. The pipes should be stored off-site and can be brought from the main compound when they are needed	If part of the required construction storage were to be located off-site, this would significantly increase the duration of construction works and the number of construction vehicle movements on the highway network. Both of these factors would result in adverse impacts on the environment and local communities.
RR-322-41	Construction compound locations	9.6. 50 car parking spaces at each compound is unnecessary additional traffic, all working should congregate at central point adjacent to major transport hubs (Eastleigh train station or M27) and then be mini-bused to site. Whilst 10 parking spaces may be necessary. This should be outside the area that is taken by compulsory purchase.	Sections 3.5.129 to 3.5.150 of ES Chapter 3 Description of the Proposed Development [APP-082] detail the types of construction compounds that would be temporarily required to support construction and provides details on parking. The Framework Construction Worker Travel Plan (appended to the Framework Construction Traffic Management Plan [APP-415]) includes measures proposed to reduce the proportion of construction worker trips made by car. Specific car parking requirements for each compound will be set out in the

Reference	Theme	Issue raised	The Applicant's response
			detailed Construction Worker Travel Plan(s) following the appointment of the Contractor.
RR-322-42	Construction compound locations	9.7. Even in graphic 3-11, more than 50% of the compound is not being used. The compounds should be limited to what is necessary for the scheme. We believe the compound should be reduced to a maximum of 20m x20m and a commercial rent should be paid.	Graphic 3-11 in ES Chapter 3 [APP-082] provides an indicative plan of a typical sectional site compound. The sectional site compounds would provide space for construction vehicles to turn and access the road network and haul road safely and efficiently, which would be undertaken in the open space remaining in the compound. The Applicant has provided detail in ES Chapter 3 Description of the Proposed Development [APP-082] regarding the compound requirements and as evidenced in the Statement of Reasons [APP-025], the Applicant considers that the land required for the scheme has been justified. The Applicant has identified construction compounds along the pipeline route to facilitate direct access to the working area. This also reduces traffic impacts on the local road network and brings efficiencies with construction. The Applicant confirms that where land is occupied temporarily by the Project, landowners may be entitled to submit claims setting out their reasonable losses in line with the compensation code.
RR-322-43	Construction compound locations	9.8. It is unnecessary and disproportionate to use compulsory powers to acquire storage compound. Items can be stored in commercial storage space. We accept that smaller works compounds may be need, but believe that statutory powers should not be granted for commercial storage of this scale	Whilst the Applicant's preference is to reach a voluntary agreement, it considers that the temporary possession powers sought within the DCO are necessary to ensure that the Project can be delivered where agreement cannot be reached. The Applicant therefore considers that the temporary possession powers sought are justified and proportionate, whilst maintaining that a voluntary agreement remains its preferred outcome where possible. If part of the required construction storage were to be located off-site, this would significantly increase the duration of construction works and the number of construction vehicle movements on the highway network. Both of these factors would result in adverse impacts on the environment and local communities.
RR-322-44	Traffic and transport	10. Access drive to Park Place Farm 10.1. We strongly object to our access drive, which serves our commercial units being used as the permanent access for the pumping station adjacent. The track is a former agricultural track with glasshouse and residential property adjacent leading to our former farm yard. The track isn't suitable for this intensified use. The farm track has not been deemed suitable for the construction of the pumping station and an alternative access track is being constructed. Why can this alternative access not be used permanently. Why is the farm track deemed unsuitable for construction yet deemed suitable for maintenance in perpetuity. Over time the pumps will need replacing, is the farm access suitable for this heavy use.	The Applicant acknowledges the concerns of the Respondent regarding the use of the private lane for permanent access to IPS G. As detailed in section 12.3 of the Environmental Statement (ES) Appendix 18.1 Transport Assessment (TA) [APP-186 to APP-188 – 3 documents], there would be two van trips a week to the site, likely on the same day, alongside an annual Medium Goods Vehicle (MGV) (under 7.5 tonnes) trip to site. Given infrequent trips would be made by light or MGV and wouldn't represent a material intensification in use, the private access is considered suitable for use. The construction access on Titchfield Lane is intended to be a temporary arrangement and will be designed and operated as such. Due to its location, which is considered suboptimal from a road safety perspective, active traffic management measures are likely to be required which cannot be maintained indefinitely.

Reference	Theme	Issue raised	The Applicant's response
			If the proposed temporary access was to be used permanently, this would result in the loss of part of the field, and permanent loss of vegetation along Titchfield Lane. This permanent use would be avoided by utilising the adjacent existing access track, which would only be used for a very small number of vehicle moments.
RR-322-45	Traffic and transport	10.2. The access onto Titchfield Road, which is shared with Park Place Farm Nursery is not suitable for the heavy goods vehicles that will be required to access the pumping station. We assume that the pumps have a limited lifespan and will need to be upgraded/replaced. This will cause significant issues. Nursery access junction with Titchfield Lane is significant concern given the poor sightlines, adverse camber and average age of clients at Nursery. Already there ae frequent near misses and additional loading will inevitably lead to accidents and high likelihood of injury or death.	As noted in response to RR-322-44, only light and medium goods vehicles would predominately be required to service IPS-G. Whilst a large vehicle may be required for plant replacement, this would be a very infrequent occurrence and would therefore not have a material impact on road safety. The access with Titchfield Lane has been discussed in detail with Hampshire County Council, including the visibility. There is understood to be an existing issue with visibility due to a private wall being constructed in the public highway which the County Council is investigating. Given the very minor intensification of use however, the impacts on road safety are considered to be negligible, as detailed in section 12.3 of the Environmental Statement (ES) Appendix 18.1 Transport Assessment [APP-186 to APP-188 – 3 documents].
RR-322-46	Landowner engagement	10.3. The access is very narrow, with no passing places. The sight lines are poor to the north. It is an accident waiting to happen. This must be reconsidered. We are most concerned regarding security. We currently lock the gates each night. With Southern Water having permanent use of the access track, any gate code will be shared and our yard will become a target for thieves.	As detailed in the response to RR-322-44, IPS G would only generate two van trips a week. It is therefore unlikely that this forecast increase in traffic demand would be perceptible compared to existing demand. The Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) sets out that the contractor would undertake a site specific risk assessment of security and trespass and implement appropriate control measures during construction. For operational access, the Applicant will seek to discuss access requirements with the respondent further to consider operational, safety and security requirements, The Applicant remains committed to working collaboratively with landowners and its clear preference is to secure voluntary agreements for access and the acquisition of land and rights wherever possible. As outlined in the Statement of Reasons [APP-025], the Applicant has sought to acquire the land and associated rights by voluntary agreement in order to facilitate delivery of the Project. The Applicant will continue to engage with the respondent on Heads of Terms for a voluntary agreement and undertook a site meeting on 20 October 2026 to discuss the respondent's feedback on security further.
RR-322-47	Landowner engagement	10.4. The safety of the public using the nursery and our commercial units is of paramount importance.	As detailed in the Applicant's response to RR-322-45, the proposed use of the private access for IPS-G would result in a very minor intensification of use and therefore would not have a material impact the safety of the nursery or adjacent commercial units.
RR-322-48	Alternatives	10.5. There is an alternative- why can't the access which is being created for the construction be retained permanently. This would be supported by the	The temporary construction access on Titchfield Lane is intended to be a temporary arrangement and will be designed and operated as such. Due to its

Reference	Theme	Issue raised	The Applicant's response
		adjoining landowners and would be safer, cheaper and significantly less detrimental to our property. It would allow access for heavy good vehicles and not impact the commercial property.	location, which is considered suboptimal from a road safety perspective, active traffic management measures are likely to be required which cannot be maintained indefinitely. If the proposed temporary access was to be used permanently, this would result in the loss of part of the field, and permanent loss of vegetation along Titchfield Lane. This would be avoided by utilising the adjacent existing access track, which would only be used for a very small number of vehicle moments during the operational phase.
RR-322-49	Landowner engagement	10.6. None of our tenants or neighbours have been consulted or contacted regarding the use of the access track. Southern Water are trying to get this passed, without the knowledge of those it will affect.	The Applicant has undertaken diligent inquiry to obtain the details of persons with an interest in the Order Limits, as summarised in the Consultation Report [APP-029] Section 9.3.17 to 9.3.30. As part of this process Land Interest Questionnaires (LIQs) were issued to the respondent ahead of the Summer 2024 Consultation to assist the respondent in identifying themselves, confirming contact details, and clarifying land ownership, occupation, tenancy arrangements, and any other interests in land, including rights of way and option agreements. The LIQs also sought to confirm that land ownership and occupation boundaries were correctly identified. The Applicant did not receive a response to these LIQs from the respondent despite reminder letters being sent. The Applicant then issued the respondent a Confirmation Schedule in October 2025, which summarised the Applicant's understanding of the respondent's interest in land relevant to the Project. The Applicant sought a response to confirm whether the information held was correct, however no response was provided despite a further reminder letter being issued in December 2025. Given the respondent has not responded to the Applicant's request for information on unregistered occupational interests in the land via the LIQ requests, the Applicant welcomes details of the tenants and occupiers so the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1) can be updated accordingly with any necessary amendments.
RR-322-50	Location of AGP	11. Re-development of Park Place Farmyard 11.1. The monstrosity of the pumping station, with the noise, odour and lighting it will cause will have significant impact on our ability to redevelop Park Place yard both for commercial use and longer term residential uses.	The Applicant has undertaken an extensive site selection process to determine the optimal location for IPS-G, which is set out from paragraph 5.12.20 to 5.12.26 in the Scheme Development Report – 1 of 3 documents [APP-073]. Noise ES Chapter 15 Noise and vibration [APP-094] assesses the operational impacts from the Project including IPS-G on residential and non-residential noise and vibration sensitive receptors. Residential Without secondary mitigation the predicted operational noise levels from IPS-G without use of the emergency generators would be permanent and significant. With use of the emergency generator, the criterion used for assessment is typically higher than for normal plant operations, as set out in ES Appendix

Reference	Theme	Issue raised	The Applicant's response
			15.3 Operational noise assessment [APP-181]. As a result, the threshold for likely significant effects is not reached under the 'with generator' scenario. Section 9 of ES Chapter 15 Noise and vibration [APP-094] and the Design Principles Document [APP-076] provides the full suite of secondary mitigation for operation of the Project, including a requirement the Contractor will be required to design IPS-G (and all other above ground plant) to ensure that operational noise levels at noise and vibration sensitive receptors do not exceed the Lowest Observed Adverse Effect Level (LOAEL). This reduces the residual effect to minor adverse, not significant. Non-residential The predicted operational noise levels from IPS-G without use of the emergency generators is not significant. With use of the emergency generators the impact would be no worse than minor, which would represent a minor adverse, not significant effect. Odour ES Chapter 6 Air quality and odour [APP-085] did not identifying any odour-related impacts or effects from the operation of IPS-G. Lighting Design Principle GDP_6, set out in the Design principles Document [APP-076] is specifically focused on 'minimising light impacts' during operation of the Project, including from above ground plant such as IPS-G. *The detailed design will seek to avoid impacts from permanent lighting on local communities and amenity, dark landscapes, nature conservation and heritage locations (including impacts to the SDNP International Dark Sky Reserve and Chichester Harbour National Landscape) in the first instance and where this is not practicable, reduce impacts as far as practicable. The detailed design for permanent lighting affecting such locations will have regard to the Bats and Artificial Lighting at Night Guidance Note 08/23* IPS-G (refer to ES Figure 13.1 Landscape and visual impact assessment study area [APP-316]) would be sited such that existing mature vegetation would provide substantial enclosure, and this would be reinforced by proposed planting. When assessed on a National Character Area perspective, IPS-G would be similar in scale to existing agricultural buildings in the area and has been sited to take advantage of existing vegetation or to associate with existing development. The year 1 operational effect is assessed minor adverse, not significant. By year 15 the operational effect is assessed as negligible adverse, not significant.
RR-322-51	Landowner engagement	12. Private Negotiations and Alternative to Compulsory Purchase	Since the commencement of negotiations of Heads of Terms, the Applicant has made several amendments to the proposed Heads of Terms as confirmed

Reference	Theme	Issue raised	The Applicant's response
		12.1. We understand that it is not for the planning Inspectorate to comment on the terms of any private negotiated agreements. We must comment that Southern Water have been impossible to work with. They have dictated terms, without giving any consideration to amending the terms. The terms offered are significantly worse that those under compulsory acquisition.	by a relevant representation made by a member of the Land Agent Group [RR-233] and improved the commercial offer during the negotiations to demonstrate this preference. and improved the commercial offer during the negotiations to demonstrate this preference. Following the Heads of Terms being issued on 7 April 2026 the Applicant discussed the Heads of Terms with the respondent's representative at a meeting on 13 May 2026. Following this, the Applicant requested a further meeting on 17 July 2026 and, after issued a letter proposing revised Heads of Terms on 7 August 2026 incorporating amended provisions and improved commercial terms. In reference to the commercial terms offered, the Applicant does not consider the offer to put the respondent in a worse position than under compulsory acquisition. The Applicant formally requested evidence from the respondent's land agent on 28 January 2026 substantiating this claim but is yet to receive a substantive response.
RR-322-52	Landowner engagement	12.2. They are only playing lip-service and have no intention of reaching any form of settlement with Landowners and Occupiers. This is apparent from the Preapplication Land and Rights Negotiation Tracker (Document 4.4) only 1 landowner has returned Heads of Terms out of 172 Category 1 Landowners. The one that has been return is a middle section of a drill section, so no above ground access is needed. 0.58% sign up rate, clearly demonstrates that Southern Water have not made any significant effort to reach agreement with Landowners and Interested Parties and they are relying on taking land by compulsion.	The Applicant refutes the respondent's comments on the approach taken to the negotiation of voluntary agreements. Whilst the Applicant would prefer to be able to advise the Examining Authority of a higher return of signed Heads of Terms, it does not consider this to be because the terms offered to the respondent are unreasonable. To date, despite formally requesting evidence demonstrating why the commercial offer is considered unreasonable on 28 January 2026, the Applicant is yet to receive a response. The Heads of Terms proposed by the Applicant closely align with those adopted across other utilities and infrastructure projects, which have also been reviewed and accepted by respective land agent groups. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with landowners and their professional advisors regarding a voluntary agreement. The Applicant refutes the suggestion that it seeks to rely on statutory powers and confirms its preference to reach a voluntary agreement. The Applicant has made several amendments to the proposed Heads of Terms as confirmed by a relevant representation made by a member of the Land Agent Gorup [RR-233] and improved the commercial offer during the negotiations to demonstrate this preference.
RR-322-53	Landowner engagement	12.3. Not a single Option Agreement has been entered into.	Whilst the Applicant would prefer to be able to advise the Examining Authority of a higher return of signed Heads of Terms and progress to Option Agreements, it does not consider this to be because the terms offered to landowners are unreasonable. To date, despite formally requesting evidence

Reference	Theme	Issue raised	The Applicant's response
			demonstrating why the commercial offer is considered unreasonable on 28 January 2026, the Applicant is yet to receive a response. The Heads of Terms proposed by the Applicant closely align with those adopted across other utilities and infrastructure projects, which have also been reviewed and accepted by respective land agent groups.
RR-322-54	Landowner engagement	12.4. I believe it is disingenuous to categorize me as Head of Terms negotiation ongoing (yellow status). This is not true, Southern Water have shown no interest in reaching an agreement with us. I request that my status is amended to Heads of Terms agreements unlikely before close of examination (red).	The Applicant considers that the status recorded for the respondent by the Applicant in the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1) is correct given that Heads of Terms for a voluntary agreement have been issued and continue to be discussed with the respondent's representative. Following the Heads of Terms being issued on 7 April 2026 the Applicant discussed the Heads of Terms with the respondent's representative at a meeting on 13 May 2026. Following this, the Applicant requested a further meeting on 17 July 2026 and, after issued a letter proposing revised Heads of Terms on 7 August 2026 incorporating amended provisions and improved commercial terms. Following a request by the respondent's representative, the Applicant recently issued updated Heads of Terms to the respondent on the 11 September 2026 and attended a site meeting with the respondent and their representative on the 20 October 2026, further evidencing the Applicant's attempts to reach a voluntary agreement.

Table 2-59 The Applicant's response to RR-323 from Ian Judd and Partners on behalf of Sue & Lynn Gamblin

Reference	Theme	Issue raised	The Applicant's response
RR-323-1	Greeting	Please see email with full Relevant Representation Relevant Representation Prepared on Behalf of Sue & Lyn Gamblin (DR & JF Gamblin Limited) In Relation to Hampshire Water Transfer and Water Recycling Project	The Applicant notes this comment.
RR-323-2	Landowner engagement	1. Key Information Name of Interest party: Sue & Lyn Gamblin Business Name: DR & JF Gamblin Limited Address: [REDACTED] Email Address: [REDACTED] Telephone Number: [REDACTED] Name & Address of Property Affected: Sandy Lane Land Plan Reference No: 17-007- 3478m² 0.3478ha 0.859 acres- Acquisition of Rights 17-008- 3966m² 0.3966ha 0.98 acres- Acquisition of Rights 17-009 -44487m² 4.4487ha- 10.993 acres â€“ Acquisition of Rights Linear length of pipe: 347m (Approx)	The Applicant notes this comment.

Reference	Theme	Issue raised	The Applicant's response
		Use of Land: Equestrian Livery Yard Land Agent Instructed: Ian Judd and Partners, 4 High Street, Bishops Waltham, Southampton, Hampshire, SO32 1AB @ianjuddandpartners.co.uk	
RR-323-3	Principle of development	2. Summary of Submission 2.1. I wish to become an interested party and submit my strongest objection to this Development Consent Order Application.	The Applicant has noted this comment.
RR-323-4	Land quality and ground conditions	2.2. Our main concerns are the impact on our business and the risks associated with exposing contaminated waste from the landfill site.	The Applicant acknowledges the concerns of Sue and Lyn Gamblin with regards to the installation of the pipelines between the Water Recycling Plant site and Otterbourne Water Supply Works, specifically where it passes through Ash House Farm landfill (located within Section J of the pipeline) and the impacts this may have on their livery business and risks associated with exposing contaminated waste materials from the landfill site. Mitigation measures would be employed during excavation works, including where excavation works interact with the historical Ash House Farm landfill. These measures include the development and adherence to risk assessments and method statements protective of human health, the environment and controlled waters (groundwater and surface waters) which will serve to reduce the potential risks associated with the installation of the pipelines through the historical Ash House Farm landfill. These mitigation measures are secured via the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). Details of Project wide primary and tertiary mitigation measures that are protective of land quality and ground conditions receptors are discussed within Section 11.4 of Environmental Statement (ES) Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1). The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions. This could include compensation during construction of the Project to mitigate impacts on trading or loss of clients.
RR-323-5	Land use and agriculture	3. Summary of Land Use 3.1. We own a total of 37.92 acres (15.35ha) of land at Sandy Lane, Waltham Chase, where we operate a livery yard. 3.2. The proposed Southern Water scheme will impact 12.83 acres of our holding, being 1/3 of our holding. In addition to this, the scheme severs our holding, making 13.44 acres completely unusable for our livery business.	Disturbance to individual field parcels is anticipated be temporary and short-term, as confirmed in Environmental Statement (ES) Chapter 12 Land Use and Agriculture [APP-091], with land being reinstated over the pipelines as soon as is practicable. The Outline Soil Resources Management Plan (SRMP), provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), notes the appointment of an Agricultural Liaison Officer (ALO) whose roles will include pre-construction

Reference	Theme	Issue raised	The Applicant's response
			discussions between landowners and the Contractor in order to reduce disruption to the existing operations of each holding affected, and ensuring landowners, occupiers and their agents are consulted in respect of requirements for field entrances and crossing points across the construction working width, particularly to severed land parcels.
RR-323-6	Landowner engagement	4. Impact on Business 4.1. We operate a livery business, with DIY livery and are concerned that the pipeline could result in our business becoming unviable and having to cease trading. 4.2. We are nervous that when our clients hear of the disturbance they will leave us, on mass. It will be impossible to attract new liveries whilst the pipeline is in construction. Livery clients tend to move on mass, given the social nature of horses. The threat of this pipe could collapse our business. 4.3. The current proposed route severs 13 paddocks. This broadly results in the loss of 26 livery spaces, which amounts to a significant part of turnover and would make the business unviable. 4.4. All the paddocks are post and plain wire, and 1 barb wire, with electric fencing. This would need to be maintained and fully reinstated at the conclusion. Our water supply, with 5 troughs, crosses the working corridor and this must be kept live at all times. Horses cannot graze without water. 4.5. The main track used for walking the horses to the southern paddocks is going to be taken. It is also used every day to exercise the horses. Our water pipe goes along the track to serve all of the troughs. If access cannot be given to the served paddocks to walk horses to grazing then further losses will occur. 4.6. We rotate our grazing between summer and winter grazing. With winter grazing on the more free draining land, which recovers in the spring, to be used from late summer/Autumn. The scheme will impact our winter grazing area, making our livery business unviable.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. Land will be restored to its original condition following the installation of the pipeline in accordance with the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), which includes the Outline Soil Resource Management Plan (SRMP) that forms Appendix B and will be developed further into the detail SRMP prior to commencement of construction. The provisions of the SRMP will ensure, through the adoption of industry good practice for soil handling, storage and reinstatement, that damage to soil is avoided or minimised, and that soil structures are maintained, such that the land can be reinstated to its original use as soon as practicable following the installation of the pipeline. The land will therefore be farmable following reinstatement, and the respondent can continue with the current livery operations. The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements could be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design once the Applicant can confirm the final working areas required. The Applicant welcomes further engagement with the respondent in order to explore potential mitigations on the overall temporary impact on the land. As secured within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), the Applicant confirms stiles, gates or gaps will be incorporated into temporary fencing where reasonably practicable to maintain access for the respondent across the construction working width and thereby mitigate field severance. Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions. This could include compensation during construction of the Project to mitigate impacts on trading or loss of clients.
RR-323-7	Landowner engagement	5. Southern Waters Conduct to date 5.1. We have been disappointed in Southern Waters conduct to date. They, via their agents have been dismissive of our concerns, incompetent in organising	The Applicant does not recognise the accusations levelled at its approach to landowners.

Reference	Theme	Issue raised	The Applicant's response
		access, and threatening compulsory purchase at every encounter. 5.2. We took part in the public consultation in 2024 & 2025, yet our concerns have never been taken seriously and have never been addressed. The public consultations was just a formality that Southern Water gave lip-service to. They have not acted on our concerns raised. 5.3. They have been most aggressive, constantly threatening court and legal action, if we do not allow access for surveys. They have entered any form of negation to allow surveys on our terms. 5.4. We do not believe that Southern Water have acted as a competent acquiring authority and believe that much more work is needed before this DCO is approved. It appears to be a rushed process or a formality that this will be approved without scrutiny.	The Applicant confirms that consultation responses were received from the respondent at both the 2024 and 2025 consultation events. The Applicant wrote to the respondent on 4 December 2025 with a response to this feedback addressing the points raised. During discussions with landowners, the Applicant has acted responsibly in making landowners aware of the statutory alternatives available, should voluntary agreements not be reached. In relation to surveys, the use of statutory powers under Section 172 of the Housing and Planning Act 2016 has been referenced in correspondence to ensure the respondent is aware of the statutory powers available but confirmed that these would only be relied upon following reasonable attempts to secure access by voluntary agreement. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with the respondent regarding a voluntary agreement. The Applicant's engagement has invited the respondent to provide information about their land but to date, no information has been shared.
RR-323-8	Land quality and ground conditions	6. Contaminated Land 6.1. We are particularly concerned in the landfill site that will be dug through the centre of. We do not know what is in the landfill site but have been informed that it was filled in the 1950/60s following sand extraction with all sorts of waste, including medical waste and other toxic waste. The Southern Water Borehole surveys found remanence of needles and other medical waste on their drill. 6.2. We have anecdotal information that pigs with Swine flu were buried in the landfill, along with asbestos and other unknown contaminants. There are no paper records, but similar landfills were typical in the 1950s. 6.3. We live in close proximity to landfill and are most concerned that any waste could be hazardous to our health or the health of contractors or the public.	The Applicant notes the concerns of Sue and Lyn Gamblin with regards to the installation of the pipelines between the Water Recycling Plant site and Otterbourne Water Supply Works (WSW), specifically where it passes through Ash House Farm landfill (located within Section J of the pipeline). Project specific ground investigations have been undertaken along the route of Section J, including within the footprint of Ash House Farm landfill. As part of the Project specific ground investigation three exploratory holes (3J5014TP, 3J5015SA and 3J5016TP) were advanced within the footprint of Ash House Farm landfill. Landfill materials were recorded in borehole logs between surface level to 6.00m below ground level (bgl), below which is the Whitecliff Sand Member. A total of 13 soil samples, between 0.30m bgl to 6.70m bgl, were collected from the three exploratory hole locations as part of the Project specific ground investigations and sent for laboratory analysis. One soil sample was collected within the natural Whitecliff Sand Member beneath the landfill material. A summary of the results of the laboratory testing, and subsequent analysis, are provided within ES Appendix 11.2 Geotechnical and geo-environmental reports ([APP-157] for document 7 of 18 documents). Additional ground investigations were recommended within ES Appendix 11.2 Geotechnical and geo-environmental reports ([APP-157] for document 7 of 18 documents) for this section of the pipelines between the Water Recycling Plant site and Otterbourne WSW. Further ground investigation will enable the Applicant to determine whether there is a distinctive capping layer for the historical landfill which the pipe construction works will need to advance through and potentially allow for the delineation of a defined boundary between the more hazardous landfill material and the capping layer.

Reference	Theme	Issue raised	The Applicant's response
			The findings of both the Project specific ground investigations that have already been undertaken and those from further ground investigation will be used to inform risk assessments and method statements protective of human health, the environment and controlled waters (groundwater and surface water) receptors during the construction phase as outlined within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). Additionally, Table 11-46 (Section J) of ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1) also includes example mitigation measures to reduce the potential impacts associated with Ash House Farm landfill. Details of Project wide primary and tertiary mitigation measures that are protective of land quality and ground conditions receptors are discussed within section 11.4 of Environmental Statement ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1).
RR-323-9	Alternatives	6.4. We believe there are alternatives to open cut through the landfill site and it should remain undisturbed. If it is disturbed, we require legal assurances that Southern Water will be liable for anything found and that they will remove any waste found.	The Applicant has considered alternative locations for the Pipeline in this area. The Applicant has had regard to feedback received from landowners in this location and has considered the potential for alternative routes. An alternative route further to the north would not be practicable due to residential properties forming part of Wickham along Little Bull Lane and Sandy Lane. An alternative route further south would result in a far greater loss of vegetation due to the presence of areas of woodland. See response RR-323-8 for an overview of the approach to ground investigations within the landfill area. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) provide measures that deal with the identification and management of contaminated or hazardous materials encountered during the construction of the Project. These include the preparation of a plan for actions to be taken in the event of encountering unforeseen contamination (measure LQGC-6 and LQGC-9 within Table 5-1), remediation actions should the contaminated land present an unacceptable risk (measure LQGC-10), the preparation of a Site Waste Management Plan (measure RWM-1) and how the Contractor will handle hazardous waste (measure RWM-8).
RR-323-10	Landowner engagement	7. Need for Compulsory Purchase Powers 7.1. The Department for Communities and Local Government, Planning Act 2008, Guidance related to Procedures for the compulsory acquisition of land (CA Guidance), sets out the requirements Acquiring Authorities should meet to be granted CPO powers. 7.2. Para 6. "provides that a development consent order may only authorise compulsory acquisition if the Secretary of State is satisfied that: - the land is required for the development to which the consent relates, or is required to facilitate, or is incidental to, the development,". 7.3. Para 8. "The applicant will also need to demonstrate that the proposed	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the

Reference	Theme	Issue raised	The Applicant's response
		interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate"	Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-323-11	Landowner engagement	7.4. Para 9. "The applicant must have a clear idea of how they intend to use the land which it is proposed to acquire. 7.5. Para 11. Section 122 of the Planning Act sets out two conditions which must be met to the satisfaction of the Secretary of State before compulsory acquisition can be authorised. The first of these is related to the purpose for which compulsory acquisition is sought. These three purposes are set out in section 122(2): (i) the land is required for the development to which the development consent relates. For this to be met, the applicant should be able to demonstrate to the satisfaction of the Secretary of State that the land in question is needed for the development for which consent is sought. The Secretary of State will need to be satisfied that the land to be acquired is no more than is reasonably required for the purposes of the development. (ii) the land is required to facilitate or is incidental to the proposed development. An example might be the acquisition of land for the purposes of landscaping the project. In such a case the Secretary of State will need to be satisfied that the development could only be landscaped to a satisfactory standard if the land in question were to be compulsorily acquired, and that the land to be taken is no more than is reasonably necessary for that purpose, and that is proportionate.	The Applicant's proposed use of the land is set out in the Works Plans (AS-008) with detail of each Works Number set out in 'Schedule 1 – Authorised Development' to the Draft Development Consent [APP-023]. The respondent is affected by 'Works No.4 – Pipeline between the WRP site and Otterbourne WSW' for which the Applicant is seeking the acquisition of rights as set out in Sheet 17 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2). The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-323-12	Location of the proposed pipeline routes	7.6. We believe that part the land included within the order limits is not necessary to facilitate the scheme and it volume of land taken is not proportionate. 7.7. On our property the order limits extending to 12.83 acres for 347 linear	The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land

Reference	Theme	Issue raised	The Applicant's response
		meters of pipe, which equates to an average of 150m in width, with a maximum width of around 227m wide. This is not justified or proportionate for a pipe of 0.8m in width. 7.8. The Acquiring Authority have not provided any justification for the scale/quantum of the Order Limits. They have stated (Para 3.3.3 Document Reference 4.1) that the maximum working width is 40m. Yet later (para 3.3.1 Document Reference 4.1- please note numbering error in document) the working width may be up to 50m.	actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs. The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m for a maximum length of 42m.
RR-323-13	Location of the proposed pipeline routes	7.9. We understand that Southern Water have chosen not to undertake detailed design and want an element of flexibility, this flexibility could be reduced to 20m in width. It is clear that the scale of the Order Limits significantly more than is reasonably necessary or proportionate for a pipe that 0.8m in width. 7.10. We believe the Order Limits should be significantly reduced to a maximum of 20m. If the Acquiring Authority require greater area for unnecessary offsite storage, they can rent commercially available space off site. 7.11. There is nothing within their submission that provides any justification for this excessive width of the order Limits.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. The design of the Project as set out in the DCO application provides flexibility for refinement informed by further surveys and investigations at the detailed design stage. The detailed design will be developed following approval of the DCO application and the appointment of a Contractor. This approach ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs. If part of the required construction storage were to be located off-site, this would significantly increase the duration of construction works and the number of construction vehicle movements on the highway network. Both of these factors would result in adverse impacts on the environment and local communities. In accordance with the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition have been met. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits, whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) sets out the maximum diameter of the pipelines for the different

Reference	Theme	Issue raised	The Applicant's response
			Project components, which may be greater than the 800mm referenced by the Respondent. The Applicant considers the permanent rights sought are justified in order to protect and preserve the integrity of the Project.
RR-323-14	Location of the proposed pipeline routes	8. Scale of the Working Area 8.1. The justification for the working width is lacking any in any detail, below is an exact Graphic 3-3 Para 3.5.92 document Reference 6.1. 8.2. This has a "Working Area and Haul Road" of 11m and a pipe trench 4m wide. This is excessive, yet only totals 15m in width. They want a further 25m for topsoil and subsoil storage. This is not reasonable or necessary.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, which is secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3)). This would provide the necessary space for a haul road, construction working areas, material storage areas, pipeline trench and soil storage areas. This is set out at section 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3)). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m, over a distance of a maximum of 42m. The haul road/working area must be a sufficient width to allow a suitably sized excavator to track back at 90 degrees to the pipe to lift it and then lower into the trench. A suitably sized excavator capable of carrying out a tandem lift of a string of pipes would circa 11m long hence the 11m required. The working area for the trench excavation is calculated using the width of the excavator capable of pipeline installation (circa 3.5m) and a 2m deviation of the pipeline route in each direction without compromising the pipelaying process. If the pipeline has to change direction the joints are designed to allow a slight angle deviation to alter the direction this is a gradual process and requires sufficient space to allow for it. Therefore, a total of 7.5m. The pipe storage/jointing area must be wide enough to allow the pipes to be welded together to form the strings before lowering into the trench. As there will be welders working on this while the excavator is operating a 1m safety exclusion zone has to be in place. The total of the pipe storage/jointing area is therefore a total of 3.5m The area required for topsoil storage is based on topsoil being 200mm thick, which equates to $8m^3$ for a 40m working width. With a side slope of 1:1 and maximum height of 1.8m an area of 7m has been allocated which includes for any bulking factor. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The area required for subsoil provides enough width in this area to segregate upper and lower subsoils, therefore there would be two separate mounds, which ensures the subsoil can be reinstated properly. A 1:1 side slope and a bulking factor has been incorporated which equates to 7m. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m.

Reference	Theme	Issue raised	The Applicant's response
			The above areas equate to a working width of 40m.
RR-323-15	Location of the proposed pipeline routes	8.3. I have undertaken a simple calculation of what may be needed as a working width - The Haul Road may be 3m wide, with occasional passing places, - Working area 8m, this allows 6m of digger working area, plus 2m pipe storage - Pipe width - this will be 1.5m plus say 1.5m each side of pipe = 4.5m - Topsoil Storage - A fair estimate is assume 150mm of topsoil, across 20m equates to $3m^3$ of topsoil, stacked at 1:2, say 2.5m x 1.25m = $3.75m^3$,therefore 2.5m for topsoil storage. - Sub-soil Storage - If the trench is 4 wide and assume a depth of 2m (2.15m below ground level) deep $7.5m^3$ of subsoil, again assume 1:2 stack equates to 4m of subsoil storage. - Excess 2m excess for fencing and other uses - Total working area required - 24m in width	See response to RR-323-14.
RR-323-16	Location of the proposed pipeline routes	8.4. It is completely unjustified, unreasonably, unnecessary for the purpose, and disproportionate to permit a working area greater than 24m in width for open cut sections of pipe.	See response to RR-323-14.
RR-323-17	Landowner engagement	8.5. If Southern Water wish to used additional space this can be done by agreement at a market rent with individual landowners.	The Applicant has been seeking voluntary agreements for all land identified for temporary possession. Details of this engagement can be found within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1). As detailed within the Statement of Reasons [APP-025], temporary possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the project. Whilst the Applicant's preference is to reach a voluntary agreement, it considers that the temporary possession powers sought within the DCO are necessary to ensure that the Project can be delivered where agreement cannot be reached. Reasonable losses incurred by landowners arising out of the temporary use of land will be reimbursed in line with the Compensation Code. The Applicant therefore considers that the temporary possession powers sought are justified and proportionate, whilst maintaining that a voluntary agreement remains its preferred outcome where possible.
RR-323-18	Landowner engagement	9. Scale of Easement Width 9.1. The DCO allows for rights to be taken on all land shown blue on the land plans. This is excessive. Southern Water have indicated outside the DCO that the easement will be 11m.	See response at RR-323-14 for the justification for the extent of the Order Limits, which the Applicant considers to be appropriate and proportionate. The purpose of the easement is to protect the integrity and operational requirements of the pipeline and to ensure appropriate access for inspection,

Reference	Theme	Issue raised	The Applicant's response
			maintenance, repair and replacement activities. The required width has been determined following a detailed technical assessment, taking account of the pipeline's diameter, depth, construction methodology, location and operational function. For sections of pipeline installed using open-cut construction, the Applicant is seeking an easement width of 11m (5.5m either side of the pipeline). This reflects the access and operational requirements associated with maintaining and, if necessary, excavating the pipeline in the future. Notably, this represents a reduction from the Applicant's published stand-off guidance for water mains of a comparable size and depth [1], which would typically require a wider protected corridor. This reduction from the normal requirement has been communicated to landowners and their agents where this is being challenged. For sections constructed using trenchless techniques, a reduced easement width is considered appropriate, taking into account depth, construction methodology and location. As the pipeline is installed at greater depth and future maintenance or operational access would be undertaken from either side of the trenchless section rather than directly above it, the same level of restriction is not required. The easement width has therefore been tailored to reflect the differing operational requirements of the construction methodologies. The Applicant is therefore satisfied that the easement widths proposed represent the minimum reasonably required to protect the pipeline and secure its safe operation over its lifetime. As detailed within the Statement of Reasons [APP-025], temporary use possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the project.
RR-323-19	Location of the proposed pipeline routes	9.2. We haven't been provided any justification of the easement width restriction. Southern Water requested a 11m easement for open cut , being 5.5m each side of the pipe, with permanent restriction place on this land. Yet for tunnelled section the easement has been reduced to 2.5m each side of the pipe.	See response to RR-323-18.
RR-323-20	Location of the proposed pipeline routes	9.3. We have assessed other water providers easement width and the typical easement width for an 800mm pipe is 8m total width. 9.4. We have requested justification for this easement width; this hasn't been supplied. We therefore believe this is unreasonable, unjustified and disproportionate and should be reduced.	See response to RR-323-18.
RR-323-21	Landowner engagement	10. Private Negotiations and Alternative to Compulsory Purchase 10.1. We understand that it is not for the planning Inspectorate to comment on the terms of any private negotiated agreements. We must comment that Southern Water have been impossible to work with. They have dictated terms,	Since the commencement of negotiations of Heads of Terms, the Applicant has made several amendments to the proposed Heads of Terms as confirmed by a relevant representation made by a member of the Land Agent Group [RR-

Reference	Theme	Issue raised	The Applicant's response
		without given any consideration to amending the terms. The terms offered a significantly worse that those under compulsory acquisition.	233] and improved the commercial offer during the negotiations to demonstrate this preference. Following the Heads of Terms being issued on 6 March 2026 the respondent's representative wrote to the Applicant confirming that the respondent rejected the terms and did not wish to have a meeting. Subsequently, the Applicant discussed the Heads of Terms with the respondent's representative at a meeting on 13 May 2026. Following this, the Applicant requested a further meeting on 17 July 2026 and, after issuing a letter proposing revised Heads of Terms on 7 August 2026 incorporating amended provisions and improved commercial terms, sought an additional meeting with the respondent's agent on 11 September 2026, evidencing the Applicant's attempts to reach a voluntary agreement. The Applicant has organised a meeting with the respondent and their representative on 8 December 2026 to discuss their feedback further. In reference to the commercial terms offered, the Applicant does not consider the offer to put the respondent in a worse position than under compulsory acquisition. The Applicant formally requested evidence from the respondent's land agent on 28 January 2026 substantiating this claim. The Applicant is yet to receive a substantive response from the land agent.
RR-323-22	Landowner engagement	10.2. They are only playing lip-service and have no intention of reaching any form of settlement with Landowners and Occupiers. This is apparent from the Pre-application Land and Rights Negotiation Tracker.(Document 4.4) only 1 landowner has returned Heads of Terms out of 172 Category 1 Landowners. The one that has been return is a middle section of a drill section, so no above ground access is needed.	The Applicant refutes the respondent's comments on the approach taken to the negotiation of voluntary agreements. Whilst the Applicant would prefer to be able to advise the Examining Authority of a higher return of signed Heads of Terms, it does not consider this to be because the terms offered to the respondent are unreasonable. To date, despite formally requesting evidence demonstrating why the commercial offer is considered unreasonable on 28 January 2026, the Applicant is yet to receive a response. The Heads of Terms proposed by the Applicant closely align with those adopted across other utilities and infrastructure projects, which have also been reviewed and accepted by respective land agent groups.
RR-323-23	Landowner engagement	10.3. 99.4% of landowners have not agreed Heads of Terms, not a single Option Agreements have been entered into sign up rate. If all landowners (except for one) deem the private agreement terms unacceptable, it is clear that the terms offered are unacceptable and demonstrates that Southern Water have not made any significant effort to reach agreement with Landowners and Interested Partys and they are relying on taking land by compulsion.	As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with landowners and their professional advisors regarding a voluntary agreement. The Applicant refutes the suggestion that it seeks to rely on statutory powers and confirms its preference to reach a voluntary agreement. The Applicant has made several amendments to the proposed Heads of Terms as confirmed by a relevant representation made by a member of the Land Agent Group [RR-233] and improved the commercial offer during the negotiations to demonstrate this preference.

Reference	Theme	Issue raised	The Applicant's response
RR-323-24	Landowner engagement	10.4. We believe it is disingenuous to categorize us as Head of Terms negotiation on-going (yellow status). This is not true; Southern Water have shown no interest in reaching an agreement with us. I request that my status is amended to Heads of Terms agreements unlikely before close of examination (red).	The Applicant considers that the status recorded for the respondent by the Applicant in the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1) is correct given that Heads of Terms for a voluntary agreement have been issued and continue to be discussed with the respondent's representative. Following the Heads of Terms being issued on 6 March 2026 the respondent's representative wrote to the Applicant confirming that the respondent rejected the terms and did not wish to have a meeting. Subsequently, the Applicant discussed the Heads of Terms with the respondent's representative at a meeting on 13 May 2026. Following this, the Applicant requested a further meeting on 17 July 2026 and, after issuing a letter proposing revised Heads of Terms on 7 August 2026 incorporating amended provisions and improved commercial terms, sought an additional meeting with the respondent's agent on 11 September 2026, evidencing the Applicant's attempts to reach a voluntary agreement. The Applicant has organised a meeting with the respondent and their representative on 8 December 2026 to discuss their feedback further.
RR-323-25	Resources and waste management	11. Land Quality and Sand 11.1. Part of our land was quarried for sand in the 1950s, the remaining land has deep deposits of buildings sand. This sand is very valuable, and the scheme is going to trap that value making it unviable to abstract the sand. This will need to be compensated. Southern Water have been unwilling to enter any discussion on the values of the sand trapped.	Those affected by compulsory acquisition or temporary possession under the DCO may be entitled to compensation in line with the Compensation Code and relevant statutory provisions. The Applicant has included the minimum amount of land necessary to deliver the authorised development within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant will only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the authorised development. The Applicant aims to work collaboratively with landowners to address concerns and agree practical solutions wherever practicable. Affected landowners are also entitled to seek independent professional advice and reimbursement of associated costs may be provided as part of the negotiation of voluntary agreements or in accordance with established law and practice if the DCO is granted. The assessment of mineral resources and potential sterilisation effects is reported in section 16.8 of ES Chapter 16 Resources and waste management [APP-095] and ES Appendix 16.1 Mineral Safeguarding Assessment [APP-183].
RR-323-26	Resources and waste management	11.2. We need assurances that our sand will not be stolen by Southern Water and used by them elsewhere on the scheme.	The Applicant acknowledges the landowner's concern regarding the ownership and use of sand present beneath the land. Part 5, Item 27 of the Draft Development Consent Order [APP-023] incorporates Parts 2 and 3 of Schedule 2 (minerals) to the Acquisition of Land Act 1981.

Reference	Theme	Issue raised	The Applicant's response
RR-323-27	Land use and agriculture	11.3. We request that an independent soils expert to prepare a detailed record of condition pre and post works, to have a quantifiable document of soil structure, nutrient levels and soil makeup.	Environmental Statement (ES) Appendix 12.1 Agricultural Land Quality [APP-169] identifies and characterises seven soil types throughout the Order Limits based on the analysis of 90 soil samples. Due to the temporary, short-term and very localised nature of disturbance to soils for the installation of the pipeline, a detailed pre-construction survey was not undertaken. The Outline Soil Resources Management Plan (SRMP) provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) notes at paragraph B.2.16 that the Agricultural Liaison Officer will be responsible for undertaking and preparing a Record of Condition to capture the condition of the land prior to commencement of construction. The Applicant therefore considers that an appropriate baseline has been established through ES Appendix 12.1 Agricultural Land Quality [APP-169] and that measures are in place to record pre-construction land conditions and support the reinstatement of affected land following construction. These measures are contained within the Outline SRMP, included as Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), and are secured through the relevant requirements of the draft DCO [APP-023].

Table 2-60 The Applicant's response to RR-328 from Susan Mason

Reference	Theme	Issue raised	The Applicant's response
RR-328-1	Land use and agriculture	The pipeline will be dug across two areas of our farm land used for the grazing of animals and growing of hay. The proposed route will result in the destruction of grazing pasture for some years and the restriction of the future use of the land in perpetuity. This will have a significantly detrimental effect of our business in both the short, medium and long term.	The Applicant acknowledges the concern regarding the temporary loss of grazing land and the potential effects on the operation of the agricultural business. The installation of the pipeline will result in temporary, short-term and localised disturbance to the affected land. The Outline Soil Resources Management Plan (SRMP), provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), confirms that soils will be reinstated as soon as practicable following installation, and the land will be returned to its original land quality, enabling agricultural activities to resume promptly, minimising disruption. Environmental Statement (ES) Chapter 12 Land Use and Agriculture [APP-091] confirms that there will be no restrictions to normal agricultural operations following installation of the pipeline. The pipeline will be installed to a minimum depth of 0.9m from the crown of the pipe and the original soil reinstated over the top. The construction of the Project will result in a temporary short-term disturbance to the agricultural land, which will be reinstated to its original condition, enabling agricultural operations to resume. ES Chapter 12 Land Use and Agriculture [APP-091] also recognises the potential for disruption to agricultural land use, including access, field severance, water supplies and farming operations. To mitigate these effects, the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for

Reference	Theme	Issue raised	The Applicant's response
			document 1 of 3) includes measures such as maintaining access where practicable, providing crossing points across the working width, relocating livestock water supplies where necessary, and ongoing engagement with affected landowners and occupiers. Where agricultural business operations are affected or interrupted, compensation would be payable in accordance with the relevant provisions of the DCO and the statutory compensation code.
RR-328-2	Consultation	We understand the need for an improved water supply but there has been very poor engagement from Southern Water to facilitate a least invasive route and feedback the outcome of their consultations. This has resulted in the proposed pipeline taking a destructive and damaging route with very little consideration of local factors.	The Applicant has undertaken extensive consultation and engagement throughout the pre-application stage. The Consultation Report [APP-029] sets out the pre-application consultation activities undertaken for the Project, comprising both non-statutory and statutory consultation. Statutory consultation was undertaken through multiple consultation stages (Summer 2024 Consultation, Spring 2025 Consultation, Autumn 2025 Consultation and Spring 2026 Consultations). Earlier non-statutory consultations (Public Consultation 2021 and Summer 2022 Consultation) were also carried out. The Applicant confirms that a consultation response was received from the respondent at the Spring 2025 Consultation. The Applicant wrote to the respondent on 10 December 2025 with a response to this feedback addressing the points raised by the respondent. Further information can also be found within the Consultation Report [APP-029]. The Applicant also met directly with the respondent and their representative on the 2 April 2025 to discuss their feedback. The Project has been designed using an extensive route selection process, considering a range of engineering, planning and environmental criteria as well as the potential for impact on existing land uses. This is set out in the Scheme Development Report [APP-073, APP-074, APP-075]. The Applicant has had regard to feedback and reviewed alternatives where these are available. In a number of locations, the Applicant has amended the design of the Project to reduce impacts on landowners' operations. However, in some locations this has not been feasible or practicable where proposed amendments would result in additional or increased impacts on the environment or the deliverability of the Project. The Applicant considered matters raised by landowners, including local factors, and reviewed whether alternative designs could mitigate these without introducing any new deliverability, environmental or land related risks or impacts. In the event that an alternative design would increase these risks or impacts, the alternative design may not have been progressed.The Applicant is continuing engagement with the respondent's representative and is seeking a meeting to discuss the respondent's feedback further.

Table 2-61 The Applicant's response to RR-332 from Jonathan Sweeney on behalf of Sweeney Family

Reference	Theme	Issue raised	The Applicant's response
RR-332-1	Landowner Engagement	Our position This representation is submitted by Jonathan Sweeney, Mark Hayward and Justin Cole in respect of the Sweeney, Hayward and Cole family ownership interests in HP761033 at Titchfield Lane, Wickham. We do not object to the principle of the Project. Our objection is to the amount and position of the land and rights Southern Water wants from this holding and the effect on farming and the existing Catesby promoted development. The Land is subject to a pre existing promotion agreement with Catesby Estates and Southern Water has known about the future development aspirations for some time. We therefore expect Southern Water to take and restrict only the land it genuinely needs, to explain why less intrusive alternatives will not work and to coordinate its design with the landowners and Catesby."	The Applicant notes this comment. The site for IPS-G (Work No. 5B) has been subject to an extensive site selection process, as set out in Sections 5.12 of the Scheme Development Report [APP-073]. The Applicant confirms that compulsory acquisition powers are sought across plot 14-011 in respect of all interests (including freehold) as shown edged black and shaded pink on the Land Plans (Document reference 2.2, DCO Volume 2, Version 2) in connection with Works No.5B shown on the Works Plans [AS-008]). The nature and extent of the works including the permanent change of land use from its current agricultural purpose, together with the Applicant's requirement to exercise ongoing control over the land and restrict access to authorised personnel, are incompatible with continued use by the current landowners. On this basis, the acquisition of the freehold is necessary, proportionate and justified. The Applicant confirms that compulsory acquisition powers are sought for rights and the creation of new rights (including imposing restrictive covenants) over plot 14-012 which is shown edged black and shaded blue on the Land Plans (Document reference 2.2, DCO Volume 2, Version 2) in connection with Works No.4 as being construction of a pipeline between the Water Recycling Plant and Otterbourne Water Supply Works. Finally, the Applicant confirms that temporary possession powers have been sought over plot 14-013 and 14-014 which is shown edged black and shaded yellow on the Land Plans (Document reference 2.2, DCO Volume 2, Version 2) in connection with Works No.6 as being the establishment of temporary construction compounds. Further details on the rights sought by the Applicant in respect of the land referred to by the respondent can be found within Schedule 5 to the Draft Development Consent Order [APP-023] and shown on Sheet 14 and Sheet 15 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2). The respondent can also find details on the types of works to be undertaken on Sheet 14 and Sheet 15 of the Works Plans [AS-008]. In accordance with the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition have been met. As detailed within the Statement of Reasons [APP-025], temporary use powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the project thus mitigating the extent of the acquisition of land and rights. Although the Applicant is willing to work with the respondent to coordinate proposal and reach a voluntary agreement, the Applicant wishes to highlight that the land being promoted for residential development is not allocated in the

Reference	Theme	Issue raised	The Applicant's response
			local plan or subject to a planning application. On this basis, the Applicant considers it would not be reasonable for the design of the Project to be impacted when there is no certainty the development would materialise. It remains the Applicant's firm preference to reach a voluntary agreement for the acquisition of land and rights where possible and the Applicant is willing to discuss voluntary agreement requirements further with the respondent. The Applicant will continue to engage with the respondent's land agent regarding their feedback and comments on the Heads of Terms. The Applicant most recently attended a site meeting with the respondent and their representative on the 20 October 2026 to discuss these matters further and consider how future development aspirations can be coordinated.
RR-332-2	Landowner engagement	For the continuation of RR-332, please refer to references RR-061-2 to RR-061-105 in table 2-9.	For the continuation of RR-332, please refer to references RR-061-2 to RR-061-105 in table 2-9.

Table 2-62 The Applicant's response to RR-336 from Ian Judd and Partners on behalf of Terry Brennan

Reference	Theme	Issue raised	The Applicant's response
RR-336-1	Greeting	Please see Relevant Representation as sent by email. Relevant Representation Prepared on Behalf of Terrance Anthony Brennan In Relation to Hampshire Water Transfer and Water Recycling Project 1. Key Information Name of Interest party: Mr Terrance Anthony Brennan Business Name Address: [REDACTED] Email Address: [REDACTED] Telephone Number: [REDACTED]	The Applicant notes this comment.
RR-336-2	Landowner engagement	Name & Address of Property Affected: Land at Wool Street Farm Land Plan Reference No: 20-015 (Freehold Acquisition) 8574 square metres (2.12 acres) 20-016 (Freehold Acquisition) 1036 square metres (0.26 acres) 20-017 (Freehold Acquisition) 1144 square metres (0.28 acres) 20-018 (Temporary Possession) 4329 square metres (1.07 acres) 20-020 (Freehold Acquisition) 1998 square metres (0.49 acres) 20-021 (Acquisition of Rights) 4114 square metres (1.02 acres) 20-022(Acquisition of Rights) 158 square metres (0.01 acres)	The Applicant notes this comment.

Reference	Theme	Issue raised	The Applicant's response
		20-023 (Acquisition of Rights) 241 square metres (0.06 acres) 20-024 (Acquisition of Rights) 30 square metres (0.01 acres) 20-025 (Acquisition of Rights) 111 square metres (0.03 acres) 20-026 (Acquisition of Rights) 4926 square metres (1.22 acres) Total Area Affected: 26661square meters (6.59 acres) Linear length of pipe: 382.6m Use of Land: Improved permanent grassland Interest Parties on my land: Natasha Ham Land Agent Instructed: Ian Judd and Partners, 4 High Street, Bishops Waltham, Southampton, Hampshire, SO32 1AB [REDACTED] anjuddandpartners.co.uk	
RR-336-3	Principle of development	2. Summary of Submission 2.1. I wish to become an interested party and submit my strongest objection to this Development Consent Order Application.	The Applicant acknowledges the respondent's position.
RR-336-4	Land use and agriculture	3. Summary of Land Use 3.1. I own Woolstreet Farm a total of 50.02acres (20.24ha) of land. 13.2% of my holding will be affected by this scheme.	The Applicant notes that approximately 13.2% of the holding is identified as being affected by the Project. The likely significant effects of the Project on agricultural land holdings, existing agricultural activities and land use receptors have been assessed within Environmental Statement (ES) Chapter 12 Land Use and Agriculture [APP-091], including consideration of the temporary and permanent land requirements associated with the Project and their potential effects on the operation of affected holdings. The construction of the Project could result in temporary or permanent impacts on agricultural land use. However, the assessment concluded that, taking account of mitigation secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) [APP-413] and [APP-414] for documents 2 and 3) and Outline Soil Resource Management Plan (SRMP), significant effects on agricultural land holdings and farm viability would not arise. Mitigation measures include maintaining access to agricultural holdings where reasonably practicable, providing additional access points where reasonably practicable to reduce field severance, relocating water supplies where grazing land is severed, and reinstating land temporarily required for construction to its former agricultural use following completion of the works.
RR-336-5	Landowner engagement	4. Impact on Business 4.1. The holding is used as livery yard, with the affected field parcels being the grazing for the livery business. Part of the holding is mown for hay, which is sold to the livery yard and to other equestrian users.	The Applicant notes this comment and confirms that the Applicant's representatives have met the respondent on site and viewed the livery yard, most recently on 13 May 2026 and 10 November 2026. The Applicant will continue to engage with the landowners and occupiers on the difficulties they may encounter during construction activities, in order to explore potential mitigations further.

Reference	Theme	Issue raised	The Applicant's response
			The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of the Project, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-336-6	Landowner engagement	5. Southern Waters Conduct to date 5.1. We have been disappointed in Southern Waters conduct to date. They, via their agents, have provided inadequate engagement with landowners. I don't believe any engineers have viewed the land to understand its constraint.	The Applicant confirms that the respondent did not raise any feedback as part of the 2024 and 2025 consultation events. Notwithstanding the above, as detailed within the Consultation Report ([APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with landowners and their professional advisors regarding the Project and voluntary agreements. Following the Heads of Terms being issued on 27 April 2026, the Applicant discussed the Heads of Terms with the respondent's representative at a meeting on 13 May 2026 and at a site meeting on the same day with the respondent. Following this, the Applicant requested a further meeting on 17 July 2026 and, after issuing a letter proposing revised Heads of Terms on 7 August 2026 incorporating amended provisions and improved commercial terms, sought an additional meeting with the respondent's agent on 11 September 2026, evidencing the Applicant's attempts to reach a voluntary agreement and engage with the respondent.
RR-336-7	Landowner engagement	5.2. We have asked for meetings with an engineer to explain why their proposals are unnecessary and impractical. These meetings have not taken place.	The Applicant provided feedback from the engineering team on the respondent's queries regarding the temporary access off the B2177 Winchester Road on the 12 June 2026. Noting the respondent's comment and following further engagement with the respondent's representative on the 11 September 2026, the Applicant most recently attended a site meeting with the respondent and their representative on the 10 November discuss the respondent's queries.
RR-336-8	Landowner engagement	5.3. We allowed access for surveys, but often the surveyors were late or took access without informing us, this is poor project management and must improve quickly as the scheme develops.	The Applicant has endeavoured and will continue to mitigate the impact of its survey programmes on landowners. The Applicant undertook a comprehensive set of surveys in 2023, 2024 and 2025 to inform the Environmental Impact Assessment. Landowners were notified in advance of survey visits and whilst the Applicant intended to undertake surveys as per the planned programme of works, circumstances can arise that require changes to be made to the timings. For example, adverse weather conditions can result in last-minute changes and a need for additional and supplementary survey requirements may arise following observations made during surveys undertaken. All surveys have been undertaken at the appropriate time of year, with seasonal ecological surveys undertaken during the appropriate seasons which can result in multiple visits to the same holdings. However, the Applicant has endeavoured to consolidate survey visits where possible to reduce multiple visits by different survey teams to the same land.

Reference	Theme	Issue raised	The Applicant's response
			A comprehensive set of survey data is necessary to inform the Environmental Impact Assessment and ensure the land impacted by the Project is fully understood and appropriately mitigated. The Applicant considers the volume of survey activity to have been proportionate in order to provide a robust assessment. The Applicant will continue to engage with affected parties to seek to agree access where required by voluntary agreement where possible and aims to minimise disturbance to existing land uses as far as reasonably practicable
RR-336-9	Landowner engagement	5.4. They have entered any form of negation to allow surveys on our terms.	Where possible, access for surveys was agreed with landowners via voluntary access licences. An upfront payment was made to reflect any potential losses suffered as a result of the survey works, but landowners were able to make a claim if losses exceeded that initial payment.
RR-336-10	Landowner engagement	6. Need for Compulsory Purchase Powers 6.1. The Department for Communities and Local Government, Planning Act 2008, Guidance related to Procedures for the compulsory acquisition of land (CA Guidance), sets out the requirements Acquiring Authorities should meet to be granted CPO powers.	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance.
RR-336-11	Landowner engagement	6.2. Para 6. 'provides that a development consent order may only authorise compulsory acquisition if the Secretary of State is satisfied that: â€¢ the land is required for the development to which the consent relates, or is required to facilitate, or is incidental to, the development'.	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance
RR-336-12	Landowner engagement	6.3. Para 8. 'The applicant will also need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate'	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if:

Reference	Theme	Issue raised	The Applicant's response
			• the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-336-13	Landowner engagement	6.4. Para 9. 'The applicant must have a clear idea of how they intend to use the land which it is proposed to acquire.	The Applicant confirms that compulsory acquisition powers are sought across plot 20-015, 20-017 and 20-020 in respect of all interests (including freehold) as shown edged black and shaded pink on the Land Plans (Document reference 2.2, DCO Volume 2, Version 2) in connection with Works No.5 shown on Sheet 20 of the Works Plans [AS-008]. The nature and extent of the works including the permanent change of land use from its current agricultural purpose, together with the Applicant's requirement to exercise ongoing control over the land and restrict access to authorised personnel, are incompatible with continued use by the current landowners. On this basis, the acquisition of the freehold is necessary, proportionate and justified. The Applicant confirms that compulsory acquisition powers are sought for rights and the creation of new rights (including imposing restrictive covenants) over plot 20-021, 20-023, 20-024 and 20-026 which is shown edged black and shaded blue on the Land Plans (Document reference 2.2, DCO Volume 2, Version 2) in connection with Works No.4 as being construction of a pipeline between the Water Recycling Plant and Otterbourne Water Supply Works. The Applicant confirms that temporary possession powers have been sought over plot 20-018 which is shown edged black and shaded yellow on the Land Plans (Document reference 2.2, DCO Volume 2, Version 2) in connection with Works No.8 as being the implementation of highways and access works. Further details on the rights sought by the Applicant in respect of the land referred to by the respondent can be found within Schedule 5 to the Draft Development Consent [APP-023] and shown on Sheet 20 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2). The respondent can

Reference	Theme	Issue raised	The Applicant's response
			also find details on the types of works to be undertaken on Sheet 20 of the Works Plans (AS-008). In accordance with the Statement of Reasons [APP-025] and as set out in the Applicant's responses above and below, the Applicant considers that the relevant tests for compulsory acquisition have been met. As detailed within the Statement of Reasons [APP-025], temporary use powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the project thus mitigating the extent of the acquisition of land and rights. It remains the Applicant's firm preference to reach a voluntary agreement for the acquisition of land and rights where possible and the Applicant is willing to discuss voluntary agreement requirements further with the respondent. The Applicant will continue to engage with the respondent's land agent regarding their feedback and comments on the Heads of Terms. The Applicant is most recently attended a site meeting with the respondent and their representative on 10 November 2026 to discuss these matters further.
RR-336-14	Landowner engagement	6.5. Para 11. Section 122 of the Planning Act sets out two conditions which must be met to the satisfaction of the Secretary of State before compulsory acquisition can be authorised. The first of these is related to the purpose for which compulsory acquisition is sought. These three purposes are set out in section 122(2): (i) the land is required for the development to which the development consent relates. For this to be met, the applicant should be able to demonstrate to the satisfaction of the Secretary of State that the land in question is needed for the development for which consent is sought. The Secretary of State will need to be satisfied that the land to be acquired is no more than is reasonably required for the purposes of the development. (ii) the land is required to facilitate or is incidental to the proposed development. An example might be the acquisition of land for the purposes of landscaping the project. In such a case the Secretary of State will need to be satisfied that the development could only be landscaped to a satisfactory standard if the land in question were to be compulsorily acquired, and that the land to be taken is no more than is reasonably necessary for that purpose, and that is proportionate.	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-336-15	Location of the proposed pipeline routes	6.6. We believe that part of the land included within the order limits is not necessary to facilitate the scheme and the volume of land taken is not proportionate.	The Applicant notes this comment and in accordance with the Statement of Reasons [APP-025] and as set out in the Applicant's responses to RR-336-10,

Reference	Theme	Issue raised	The Applicant's response
			RR-336-11, RR-336-12 and RR-336-14, the Applicant considers that the relevant tests for compulsory acquisition have been met. The Applicant has included the minimum amount of land necessary to deliver the authorised development within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the authorised development. As detailed within the Statement of Reasons [APP-025], temporary use possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the Project.
RR-336-16	Location of the proposed pipeline routes	6.7. On our property the order limits extending to 6.59 acres for 382 linear meters of pipe.	The Applicant notes this comment.
RR-336-17	Location of the proposed pipeline routes	6.8. The Acquiring Authority have not provided any justification for the scale/quantum of the Order Limits. They have stated (Para 3.3.3 Document Reference 4.1) that the maximum working width is 40m. Yet later (para 3.3.1 Document Reference 4.1- please note numbering error in document) the working width may be up to 50m.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m for a maximum length of 42m.
RR-336-18	Location of the proposed pipeline routes	6.9. We understand that Southern Water have chosen not to undertake detailed design and want an element of flexibility, this flexibility could be reduced to 20m in width. It is clear that the scale of the Order Limits significantly more than is reasonably necessary or proportionate for a pipe that 1.4m in width.	The design of the Project as set out in the DCO application provides flexibility for refinement informed by further surveys and investigations at the detailed design stage. The detailed design will be developed following approval of the DCO application and the appointment of a Contractor. This approach ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-336-19	Location of the proposed pipeline routes	6.10. We believe the Order Limits should be significantly reduced to a maximum of 20m. If the Acquiring Authority require greater area for unnecessary off-site storage, they can rent commercially available space off site.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. When

Reference	Theme	Issue raised	The Applicant's response
			intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m for a maximum length of 42m. If part of the required construction storage were to be located off-site, this would significantly increase the duration of construction works and the number of construction vehicle movements on the highway network. Both of these factors would result in adverse impacts on the environment and local communities.
RR-336-20	Location of the proposed pipeline routes	6.11. There is nothing within their submission that provides a justification for this excessive width of the order Limits.	Please refer to the response to RR-336-17.
RR-336-21	Location of AGP	7. Scale of Freehold Purchase 7.1. The scheme proposes the freehold purchase of 3.15 acres of my land, we understand the purpose of this freehold land take is for screening for the pumping station on the neighbouring property. The need for screening is that the pumping station is situated on top of a hill, visible from the South Downs National Park. Yet our land is some 30m lower than the pumping station, no amount of natural tree planting will help with the visual impact on the lower ground. This has not been properly considered by Southern Water.	The site selection process for BPT-K has considered various technical, environmental and planning criteria as set out in the Scheme Development Report [APP-073, APP-074, APP-075]. The location was selected as the site benefits from existing trees and woodland which provide screening to the north, south and east. As explained at section 3.3.86 of ES Chapter 3 Description of the Proposed Development [APP-082], BPTs are required at high points along the Pipeline between the WRP site and Otterbourne WSW. Water is pumped from the WRP site or IPSs to BPTs located at high points, where it then flows onwards using gravity from the tank. This reduces the amount of energy required to transfer water. The Applicant does not agree that the visual effects of BPT-K have not been properly considered. The likely landscape and visual effects of BPT-K are assessed in ES Chapter 13 Landscape and visual [APP-092] and ES Appendix 13.4 Visual Baseline and Effects [APP-174]. The assessment includes viewpoints within the South Downs National Park and its setting, including VP082, VP084 from which BPT-K would be visible. The design of BPT-K incorporates a range of embedded mitigation measures to reduce visual effects and assist landscape integration. These include limiting the maximum building height to 5.6m above existing ground level, embedding the structure into the hillside, the use of materials and colours appropriate to local landscape character, and reinforcement of existing tree cover together with new planting. These measures are secured through the Design Principles Document [APP-076]. The assessment acknowledges that BPT-K would remain visible from some locations, including parts of the SDNP and its setting. The assessment therefore does not rely solely on planting to avoid or mitigate effects. The likely visual effects of the Project, including the contribution of proposed mitigation

Reference	Theme	Issue raised	The Applicant's response
			planting, have been assessed and reported transparently within ES Chapter 13. The assessment concludes that, whilst mitigation would reduce the prominence of the development over time, significant residual visual effects would remain at VP082 during operation. Viewpoint locations are shown in ES Figure 13.22 Representative viewpoint [APP-327]; Viewpoint photography is shown in ES Figure 13.23 Viewpoint photography [APP-328 to APP-372]; including photomontages; and a detailed assessment of each viewpoint is presented in ES Appendix 13.4 Visual baseline and effects [APP-174].
RR-336-22	Landowner engagement	7.2. We do not see the need to acquire the freehold of this land. The land could be taken on a long lease or the restriction by way of restrictive covenant. There are clear alternatives to freehold compulsory purchase and these have not been considered by Southern Water.	The Applicant confirms that compulsory acquisition powers are sought across plot 20-015, 20-017 and 20-020 in respect of all interests (including freehold) as shown edged black and shaded pink on the Land Plans (Document reference 2.2, DCO Volume 2, Version 2) in connection with Works No.5 shown on the Works Plans [AS-008]. The nature and extent of the works including the permanent change of land use from its current agricultural purpose, together with the Applicant's requirement to exercise ongoing control over the land and restrict access to authorised personnel, are incompatible with continued use by the current landowners. On this basis, the acquisition of the freehold is necessary, proportionate and justified. Notwithstanding the above, the Applicant wishes to discuss the voluntary agreement terms further with the respondent and most recently attended a site meeting with the respondent and their representative on 10 November 2026 to discuss these matters further.
RR-336-23	Landowner engagement	7.3. We do not wish to have our freehold property taken by compulsion, when alternatives are available.	The Applicant notes this comment and most recently attended a site meeting with the respondent and their representative on 10 November 2026 to discuss these matters further.
RR-336-24	Location of the proposed pipeline routes	8. Scale of the Working Area 8.1. The justification for the working width is lacking any reality, below is an exact Graphic 3-3 Para 3.5.92 document Reference 6.1. [GRAPHIC]	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, which is secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3)). This would provide the necessary space for a haul road, construction working areas, material storage areas, pipeline trench and soil storage areas. This is set out at section 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3)). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m, over a distance of a maximum of 42m. The haul road/working area must be a sufficient width to allow a suitably sized excavator to track back at 90 degrees to the pipe to lift it and then lower into

Reference	Theme	Issue raised	The Applicant's response
			the trench. A suitably sized excavator capable of carrying out a tandem lift of a string of pipes would circa 11m long hence the 11m required. The working area for the trench excavation is calculated using the width of the excavator capable of pipeline installation (circa 3.5m) and a 2m deviation of the pipeline route in each direction without compromising the pipelaying process. If the pipeline has to change direction the joints are designed to allow a slight angle deviation to alter the direction this is a gradual process and requires sufficient space to allow for it. Therefore, a total of 7.5m. The pipe storage/jointing area must be wide enough to allow the pipes to be welded together to form the strings before lowering into the trench. As there will be welders working on this while the excavator is operating a 1m safety exclusion zone has to be in place. The total of the pipe storage/jointing area is therefore a total of 3.5m The area required for topsoil storage is based on topsoil being 200mm thick, which equates to $8m^3$ for a 40m working width. With a side slope of 1:1 and maximum height of 1.8m an area of 7m has been allocated which includes for any bulking factor. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The area required for subsoil provides enough width in this area to segregate upper and lower subsoils, therefore there would be two separate mounds, which ensures the subsoil can be reinstated properly. A 1:1 side slope and a bulking factor has been incorporated which equates to 7m. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The above areas equate to a working width of 40m.
RR-336-25	Location of the proposed pipeline routes	8.2. This has a "Working Area and Haul Road" of 11m and a pipe trench 4m wide. This is excessive, yet only totals 15m in width. They want a further 25m for topsoil and subsoil storage.	Please refer to the Applicant's response to RR-336-24.
RR-336-26	Location of the proposed pipeline routes	8.3. I have undertaken a simple calculation of what may be needed as a working width - The Haul Road may be 3m wide, with occasional passing places, - Working area 8m, this allows 6m of digger working area, plus 2m pipe storage - Pipe width - this will be 1.5m plus say 1.5m each side of pipe = 4.5m - Topsoil Storage - A fair estimate is to assume 150mm of top soil, across 20m equates to 3m3 of top soil, stacked at 1:2, say 2.5m x 1.25m = 3.75m3 ,therefore 2.5m for topsoil storage. - Sub-soil Storage - If the trench is 4m wide and assume a depth of 2m (2.15m below ground level) deep 7.5m3 of subsoil, again assume 1:2 stack equates to 4m of subsoil storage.	Please refer to the Applicant's response to RR-336-24.

Reference	Theme	Issue raised	The Applicant's response
		- Excess 2m excess for fencing and other uses - Total working area required - 24m in width	
RR-336-27	Location of the proposed pipeline routes	8.4. It is completely unjustified, unreasonable and unnecessary for the purpose, and disproportionate to permit a working area greater than 24m in width for open cut sections of pipe	Please refer to the Applicant's response to RR-336-24.
RR-336-28	Landowner engagement	8.5. If Southern Water wish to use additional space this can be done by agreement at a market rent with individual landowners.	The Applicant has been seeking voluntary agreements for all land identified for temporary possession. Details of this engagement can be found within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1). As detailed within the Statement of Reasons [APP-025], temporary use possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the project. Whilst the Applicant's preference is to reach a voluntary agreement, it considers that the temporary possession powers sought within the DCO are necessary to ensure that the Project can be delivered where agreement cannot be reached. Reasonable losses incurred by landowners arising out of the temporary use of land will be reimbursed in line with the Compensation Code. The Applicant therefore considers that the temporary possession powers sought are justified and proportionate, whilst maintaining that a voluntary agreement remains its preferred outcome where possible.
RR-336-29	Location of the proposed pipeline routes	9. Scale of Easement Width 9.1. We haven't been provided any justification of the easement width restriction. Southern Water requested a 11m easement for open cut, being 5.5m each side of the pipe, with permanent restriction place on this land. Yet for tunnelled section the easement has been reduced to 2.5m each side of the pipe.	The purpose of the easement is to protect the integrity and operational requirements of the pipeline and to ensure appropriate access for inspection, maintenance, repair and replacement activities. The required width has been determined following a detailed technical assessment, taking account of the pipeline's diameter, depth, construction methodology, location and operational function. For sections of pipeline installed using open-cut construction, the Applicant is seeking an easement width of 11m (5.5m either side of the pipeline). This reflects the access and operational requirements associated with maintaining and, if necessary, excavating the pipeline in the future. Notably, this represents a reduction from the Applicant's published stand-off guidance for water mains of a comparable size and depth [1], which would typically require a wider protected corridor. This reduction from the normal requirement has been communicated to landowners and their agents where this is being challenged. For sections constructed using trenchless techniques, a reduced easement width is considered appropriate, taking into account depth, construction

Reference	Theme	Issue raised	The Applicant's response
			methodology and location. As the pipeline is installed at greater depth and future maintenance or operational access would be undertaken from either side of the trenchless section rather than directly above it, the same level of restriction is not required. The easement width has therefore been tailored to reflect the differing operational requirements of the construction methodologies. The Applicant is therefore satisfied that the easement widths proposed represent the minimum reasonably required to protect the pipeline and secure its safe operation over its lifetime.
RR-336-30	Location of the proposed pipeline routes	9.2. We have assessed other water providers easement width and the typical easement width for an 800mm pipe is 8m total width.	Please refer to the Applicant's response to RR-336-29. In accordance with the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition have been met. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits, whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) sets out the maximum diameter of the pipelines for the different Project components, which may be greater than the 800mm referenced by the Respondent. The Applicant considers the permanent rights sought are justified in order to protect and preserve the integrity of the Project.
RR-336-31	Construction impacts and effects	9.3. We have requested justification for this easement width; this hasn't been supplied. We therefore believe this is unreasonable, unjustified and disproportionate and should be reduced.	Please refer to the Applicant's response to RR-336-29.
RR-336-32	Construction compound locations	10. Temporary Access from Winchester Road 10.1. It is proposed to have a temporary access from Winchester Road to the pumping station. We do not see why this is necessary, when there is an existing permanent access to the pumping station from Winters Hill.	The existing access track from Winters Hill would not be suitable for construction traffic, given its width and the angle of its bends. Widening of the existing access track would require the loss of vegetation, including potential loss of ancient woodland, and works within a watercourse, which would be avoided by using a temporary access directly from Winchester Road (B2177).
RR-336-33	Construction compound locations	10.2. We have tried to arrange a meeting with a highway engineer to discuss the access point, but Southern Water have been unwilling to meet.	Please refer to the Applicant's response to RR-336-7.
RR-336-34	Construction compound locations	10.3. The access point is in the wrong place, it's on a blind bend and very dangerous. There is an existing dropped curb 150m north, with much improved sight line. We have encouraged Southern Water to use the alternative access, but they have ignored us.	A Framework Construction Traffic Management Plan [APP-415] has been prepared in support of the Project and includes illustrative designs of all construction compound accesses and the supporting traffic management measures that should be considered to facilitate safe and suitable access. This includes an indicative design for the access with Winchester Road along with the suggested traffic management that could be considered to make this

Reference	Theme	Issue raised	The Applicant's response
			access safe. With the appropriate traffic management, it is considered that this access could be operated safely.
RR-336-35	Water environment	10.4. The proposed southern access is going through a very waterlogged part of the field, which we intended to turn into a wildlife pond, as the field is too wet to use. It is going to be very difficult to stop the road from flooding, even after short periods of rain.	The Applicant acknowledges the local information provided by respondent, and confirms that flood risk has been considered in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) and ES Appendix 19.1 Flood Risk Assessment – 1 of 8 documents [APP-189]. These assessments note that the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) sets out a range of measures that are intended to protect the Project from flooding and prevent increases in off-site flooding occurring as a result of the Project. These measures include: • Measure WE4: This measure sets out a commitment for the Contractor to prepare a Construction Drainage Plan to manage the quality and quantity of construction site drainage. This will include measures to reduce water within the working area and ensure ongoing drainage of surrounding land. The plan will be informed by surveys undertaken by a specialist drainage contractor, which will locate drains and create pre-construction drawings to ensure appropriate reinstatement. • Measure WE5: This measure includes a commitment to ensure that soil storage in areas of increased flood risk is avoided. Where this is unavoidable, storage areas will be designed and located to ensure that they do not block or divert existing flow paths. • Measure WE10: This measure notes that where works occur within a flood risk zone, the Contractor will be obliged to carry out a risk assessment and ensure the Project does not increase flood risk outside the site. On the basis of these measures, ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) concludes that there will be no likely significant effects on flood risk as a result of the Project. The Outline Soil Resources Management Plan, provided as Appendix B to the Outline CEMP [APP-412] includes controls on soil handing in relation to soil moisture state and rainfall criteria, ensuring that soils are only handled or trafficked when in a suitable dry condition. The Applicant considers that there are adequate controls on surface water and flood risk management, as well as soil handling, to ensure there is no increased flood risk arising from the construction of the Project.
RR-336-36	Construction impacts and effects	10.5. The proposed access track goes through the middle of a wooded area of scrub, which is the home to deer, foxes, farmland bird and a host of other wildlife. But by relocating the access 150m north, this could be avoided.	As per GDP_10, GDP_11, and GDP_13 (see the Design Principles Document [APP-076]), the detailed design is committed to protect the environment and retain existing vegetation however where this is not reasonably practicable, reinstatement planting will be undertaken. Post consent and prior to construction starting, pre-construction surveys will also be undertaken by the Contractor for protected habitats and species to

Reference	Theme	Issue raised	The Applicant's response
			confirm and update the baseline survey findings, as detailed in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3).
RR-336-37	Construction compound locations	10.6. We have planning approval for an agricultural barn, where the track is proposed, but relocating the track would avoid this barn.	The Applicant understands the Respondent is referring to the agricultural storage building with planning reference 25/00491/APN. The plans for this building, as shown on the Winchester City Council planning portal, show that the building would be located to the east of temporary access track, and will therefore not intersect the building.
RR-336-38	Landowner engagement	10.7. It is most frustrating that Southern Water have been unwilling to listen to our concerns on this matter, which could be easily resolved.	Please refer to the Applicant's response to RR-336-7. The Applicant is most recently attended a site meeting with the respondent and their representative on 10 November 2026 to discuss these matters further.
RR-336-39	Landowner engagement	11. Private Negotiations and Alternative to Compulsory Purchase 11.1. We understand that it is not for the planning Inspectorate to comment on the terms of any private negotiated agreements. We must comment that Southern Water have been impossible to work with. They have dictated terms, without giving any consideration to amending the terms. The terms offered are significantly worse that those under compulsory acquisition.	Since the commencement of negotiations of Heads of Terms, the Applicant has made several amendments to the proposed Heads of Terms as confirmed by a relevant representation made by a member of the Land Agent Group [RR-233] and improved the commercial offer during the negotiations to demonstrate this preference. In reference to the commercial terms offered, the Applicant does not consider the offer to put the respondent in a worse position than under compulsory acquisition. The Applicant formally requested evidence from the respondent's land agent on 28 January 2026 substantiating this claim. The Applicant is yet to receive a substantive response from the land agent.
RR-336-40	Landowner engagement	11.2. They are only playing lip-service and have no intention of reaching any form of settlement with Landowners and Occupiers. This is apparent from the Preapplication Land and Rights Negotiation Tracker (Document 4.4) only 1 landowner has returned Heads of Terms out of 172 Category 1 Landowners. The one that has been returned is a middle section of a drill section, so no above ground access is needed. 0.58% sign up rate, clearly demonstrates that Southern Water have not made any significant effort to reach agreement with Landowners and Interested Parties and they are relying on taking land by compulsion.	The Applicant refutes the respondent's comments on the approach taken to the negotiation of voluntary agreements. Whilst the Applicant would prefer to be able to advise the Examining Authority of a higher return of signed Heads of Terms, it does not consider this to be because the terms offered to the respondent are unreasonable. To date, despite formally requesting evidence demonstrating why the commercial offer is considered unreasonable on 28 January 2026, the Applicant is yet to receive a response. The Heads of Terms proposed by the Applicant closely align with those adopted across other utilities and infrastructure projects, which have also been reviewed and accepted by respective land agent groups. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with landowners and their professional advisors regarding a voluntary agreement. The Applicant refutes the suggestion that it seeks to rely on statutory powers and confirms its preference to reach a voluntary agreement. The Applicant has made several amendments to the proposed Heads of Terms as confirmed by a

Reference	Theme	Issue raised	The Applicant's response
			relevant representation made by a member of the Land Agent Gorup [RR-233] and improved the commercial offer during the negotiations to demonstrate this preference.
RR-336-41	Landowner engagement	11.3. Not a single Option Agreement has been entered into.	Whilst the Applicant would prefer to be able to advise the Examining Authority of a higher return of signed Heads of Terms and progress to Option Agreements, it does not consider this to be because the terms offered to landowners are unreasonable. To date, despite formally requesting evidence demonstrating why the commercial offer is considered unreasonable on 28 January 2026, the Applicant is yet to receive a response. The Heads of Terms proposed by the Applicant closely align with those adopted across other utilities and infrastructure projects, which have also been reviewed and accepted by respective land agent groups.
RR-336-42	Landowner engagement	11.4. I believe it is disingenuous to categorize me as 'Head of Terms negotiation ongoing' (yellow status). This is not true, Southern Water have shown no interest in reaching an agreement with us. I request that my status is amended to 'Heads of Terms agreements unlikely before close of examination (red)'.	The Applicant considers that the status recorded for the respondent by the Applicant in the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1) is correct, given that Heads of Terms for a voluntary agreement have been issued and continue to be discussed with the respondent's representative. Following the Heads of Terms being issued on 27 April 2026, the Applicant discussed the Heads of Terms with the respondent's representative at a meeting on 13 May 2026 and at a site meeting on the same day with the respondent. Following this, the Applicant requested a further meeting on 17 July 2026 and, after issuing a letter proposing revised Heads of Terms on 7 August 2026 incorporating amended provisions and improved commercial terms, sought an additional meeting with the respondent's agent on 11 September 2026, evidencing the Applicant's attempts to reach a voluntary agreement and continue negotiations with the respondent.
RR-336-43	Land use and agriculture	12. Land Quality and Water Logging 12.1. Our soils comprise of Windsor Soil Type, seasonally wet deep clay, described as Slowly permeable seasonally waterlogged clayey soils with impeded drainage.	Southern Water confirms that seasonally wet, deep clays of the Windsor association have been identified in the Order Limits. All soils affected by construction works will be managed according to good practice principles as contained in the Outline Soil Resources Management Plan (SRMP), provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3).
RR-336-44	Land use and agriculture	12.2. Our land can become very wet during the Winter. The soils are clayey, with impeded drainage. We wouldn't take a tractor onto our land between November and March, as they will get stuck.	Refer to response to RR-336-43. Additionally, the Outline Soil Resources Management Plan (SRMP), provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), includes protocols for determining appropriate soil handling conditions in relation to soil moisture state and rainfall criteria. The soils will be managed according to industry good practice to minimise damage caused to soils, including through compaction by machinery.

Reference	Theme	Issue raised	The Applicant's response
RR-336-45	Land use and agriculture	12.3. We believe it will be impossible to work on the land for 4 to 5 months of the year, particularly when the top soil has been stripped and the subsoils compacted with heavy machinery. There is insufficient information within the applicant's submission as how they are going to deal with this issue. How they are going to stop soil erosion and water and sediment runoff to the local streams and ditches.	Refer to response to RR-336-44. Additionally, the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) includes controls at provision WE5 to minimise sediment runoff and pollution risks and which are intended to protect nearby watercourses and drainage features during construction. Measure WE4 of the Outline CEMP(Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) describes the implementation of a Construction Drainage Plan which will address the interception and control of surface water run-off, as well as including measures such as limiting the extent of open excavations along the pipeline, capping soil stockpiles and retaining field strips of vegetation in order to minimise erosion and sediment run-off into local watercourses.
RR-336-46	Construction impacts and effects	12.4. How can we the landowner stop the contactors if the ground conditions become detrimental to work in.	The Applicant considers that there are adequate controls within the Outline Soil Resource Management Plan (Outline SRMP), provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), to ensure that the soils are only worked or traversed by machinery when in a suitable condition. The monitoring protocols include live, ongoing monitoring of the soil moisture state as well as rainfall criteria. The Outline SRMP also provides for the appointment of an Agricultural Liaison Officer (ALO), who will be the primary point of contact for landowners to raise concerns during construction. The role of the ALO is set out in paragraph B.2.16 and includes the undertaking of site inspections during construction to monitor working practices, including implementation of soil handling methodologies.

Table 2-63 The Applicant's response to RR-340 from Giles Wheeler-Bennett Ltd on behalf of The Ambrose Family

Reference	Theme	Issue raised	The Applicant's response
RR-340-1	Location of the proposed pipeline routes	The proposed route of the pipeline directly affects the Ambrose Family's property - (redacted) Southampton.	The Applicant has noted this comment. This location of the Pipeline is heavily constrained by residential properties along Scivier's Lane and vegetation, including a high number of category A trees and a veteran tree. The Pipeline route has been selected to reduce the loss of trees as far as practicable whilst also reducing impacts on existing land uses.
RR-340-2	Water environment	Their property is positioned in an already sensitive location for land drainage and groundwater movements. The proposed pipeline will undoubtedly impact on what is already a delicate and finely balanced situation and with no details as yet from Southern Water as to how they propose to address the drainage needs of the pipe itself or how it will tie-in/relate to the existing drainage	The Applicant acknowledges the Respondent's comments regarding the sensitivity of the location with respect to land drainage and groundwater movements. Measure WE4 in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) sets out a commitment for the Contractor to prepare a Construction Drainage Plan to manage the quantity and quality of

Reference	Theme	Issue raised	The Applicant's response
		infrastructure on site, the Ambrose Family are seriously concerned about the impact of the scheme on their home and adjacent land.	construction-stage drainage. This will be informed by surveys undertaken by a specialist drainage contractor, to locate drains and create pre-construction drawings to ensure appropriate reinstatement. In addition to setting out to reduce water within the working area and ensure ongoing drainage of surrounding land, the Construction Drainage Plan will also set out a suitable methodology for the reinstatement of drainage systems impacted by pipeline installation, where appropriate. This will be informed by the pre-construction survey. In the event reinstating existing land drains is not feasible, a Post-Construction Drainage Plan will be implemented. The purpose of the Post-Construction Drainage Plan is to restore the soil structure and drainage status to at least the same condition as recorded prior to commencement of the construction works. On the basis of these measures, Environmental Statement Appendix 19.1 Flood Risk Assessment - 1 of 8 documents [APP-189] concludes that the Project is situated in an appropriate location with regards to flood risk to land around Scivier's Lane, flood risks would be appropriately controlled during the construction phase, and there would be no increase in off-site flood risk. As the Construction Drainage Plan will set out a methodology for the reinstatement of drainage systems, and a Post Construction Drainage Plan will ensure the soil structure and drainage is restored to its pre-construction state, flood risk would also be appropriately controlled during the operational phase.
RR-340-3	Water environment	The ultimate concern being that their home could be flooded if this matter is not handled correctly and professionally.	The Applicant acknowledges the Respondent's comments and has provided additional information in its response to RR-340-2.
RRf-340-4	Water environment	Without adequate drainage alongside the pipe, the installation of a barrier in the ground across the heart of the property will inevitably have an impact on how groundwater moves (or doesn't move) around the new obstruction and so a detailed and bespoke drainage plan will be needed for this site and surrounding land/roads.	The Applicant acknowledges the Respondent's comments and has provided additional information in its response to RR-340-2.

Table 2-64 The Applicant's response to RR-341 from Ian Judd and Partners on behalf of The Hulme Family

Reference	Theme	Issue raised	The Applicant's response
RR-341-1	Greeting	Please see supporting email 1. Key Information Name of Interest party: [REDACTED] Business Name Address: Inwood Cottage, Winchester Road, Upham, Southampton SO32 1HH Email Address: [REDACTED]@hillandhulme.co.uk Telephone Number: [REDACTED]	The Applicant notes this comment.

Reference	Theme	Issue raised	The Applicant's response
RR-341-2	Landowner engagement	Name & Address of Property Affected: Land at Winchester Road, Lower Upham Land Plan Reference: No: 21-016 - 9003m2 0.90ha - 2.22 acres - Acquisition of Rights Linear length of pipe: 139m Use of Land: Domestic Paddock adjacent to Family Home Land Agent Instructed: Ian Judd and Partners, 4 High Street, Bishops Waltham, Southampton, Hampshire, SO32 1AB 01489 896422 [REDACTED]@ianjuddandpartners.co.uk	The Applicant notes this comment.
RR-341-3	Principle of development	2. Summary of Submission 2.1. I wish to become an interested party and submit my strongest objection to this Development Consent Order Application.	The Applicant acknowledges the respondent's position.
RR-341-4	Landowner engagement	3. Our property, 3.1. We live at Inwood Cottage and own the 7.17 acres to the west of the property. The land is used as extending garden to allow our children to play, to keep domestic poultry, a sheep, horses and occasionally pigs.	The Applicant notes this comment.
RR-341-5	Landowner engagement	3.2. The scheme will significantly impact on the enjoyment of our land and our ability to tend to our livestock	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use land occupied by the working width but confirms that it will seek to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant has identified a need for a 40m working width in areas where the pipeline is constructed by open-cut trenching. The Applicant will continue to engage with the landowners and occupiers on the difficulties they may encounter during construction activities, in order to explore potential mitigations further. The Applicant confirms that the respondent may be entitled to claim compensation for reasonable crop loss and disturbance losses arising out of the temporary use of the land for construction of the Project, in line with the Compensation Code. As set out by the respondent, the land is used for domestic and agricultural purposes. None of the restrictions set out in Schedule 5 to the Draft Development Consent Order [APP-023] will prohibit the respondent from continuing to use the land for this purpose once construction is complete.
RR-341-6	Landscape and visual	3.3. Our land is bordered by a linear group of mature common Oak located along the North Western boundary. The trees are of notable size providing an element of natural screening between our property and our neighbours, as well as enhancing the setting of the site.	The Applicant notes the amenity that the trees referred provide to residents of these properties. The oak trees (T714 to T717) would be impacted based on the worst case assessment in the ES Appendix 13.5 Arboricultural Impact Assessment [APP-175 to APP-176 - 2 documents] but a reduced working width has been proposed and secured through Outline CEMP Appendix A - 2 of 3 documents [APP-413] to minimise the tree loss. Where vegetation removal is unavoidable, it will be the intention of the detailed design to avoid high-quality category A trees as first priority, followed by moderate-quality category B (T712, T714 to T717) and low-quality category C trees (T713),

Reference	Theme	Issue raised	The Applicant's response
			wherever practicable as set out in LVI2 in the Outline Construction Environmental Management Plan - 1 of 3 documents [APP-412]. Where the removal of trees (on land that would not contain above ground structures) during construction cannot be avoided, reinstatement planting will be undertaken. Loss of existing habitat and landscape features will be mitigated with replacement planting undertaken as close to the location of the existing vegetation as practicable as secured through the Outline Landscape and Ecology Management Plan [APP-420].
RR-341-7	Landscape and visual	3.4. Due to the maturity of these trees, I would like to know exactly how it is proposed that these are preserved and the plans that are in place to ensure that they remain in place and their roots are not damaged. These Oaks have been in place for many years and should they be compromised they could pose a risk to surrounding, livestock, properties and buildings.	Some of these oak trees would require removal based on the worst case assessment as noted in the response in RR-341-6 and the remaining trees would be retained and protected by the mitigation measures described below. Mitigation measures to reduce damage to tree roots are secured by TFB19 in the Outline Construction Environmental Management Plan - 1 of 3 documents [APP-412]. Temporary tree protection fencing will be installed to protect the trees to be retained in detailed design to ensure no excavations, soil compaction or damage to roots and canopy take place within the root protection areas (RPAs). Protective Heras rail fencing will allow a maximum 1m buffer between the extent of proposed excavation works and RPAs of the retained trees.
RR-341-8	Construction impacts and effects	4. Heath Issues living adjacent to Project 4.1. we have two young children who are obsessed with plant and machinery. Not only would the proposed work impact on their enjoyment of our land and the ability for them to roam free as they wish, we would also have huge concerns over their safety.	Under the Construction (Design and Management) Regulations 2015 the Contractor, once appointed, must ensure the security of all work areas and its maintenance, this would include prevention of access to hazardous areas or equipment. Sections 4.6 and 4.8 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) details how construction site security measures will be implemented to protect the site from unauthorised access. It is also specified that the Contractor shall engage with local schools to raise awareness of the risks associated with construction sites and activity, in liaison with the Applicant's Senior Stakeholder Manager – Major Projects. Appropriate provisions would therefore be in place to protect members of the public, including the children of the respondent. Any access roads severed by the Pipeline route would have crossing points installed to maintain access until the full reinstatement is complete. As detailed in the Traffic Management Strategy (TMS) [APP-416], access to properties would be retained during the construction period.
RR-341-9	Landowner engagement	4.2. Not only is there the temptation of plant and machinery which my children would wish to look at or even climb on to, the proposed works would mean that the site would be effectively an open corridor to the main roads, which if either my children or father-in-law accessed could put them at risk of coming to significant harm or worse. I would have to continuously monitor my children	The Applicant will carry out site-specific assessments of security and trespass risk and implement appropriate control measures as a post-consent activity. The Applicant will also ensure that secure barrier fencing, lighting and a gate person (where practicable) are in place to reduce safety risks and perceptions of safety risks around construction sites for the public. These measures are outlined within Section 4.6 of the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for

Reference	Theme	Issue raised	The Applicant's response
		and father-in-law constantly to ensure they were safe and did not access the site.	document 1 of 3), secured in Requirement 6 of the draft Development Consent Order [APP-023].
RR-341-10	Construction impacts and effects	4.3. I would also be concerned that this open corridor effectively means that anyone could have access to our property and the security of that and our outbuildings could be compromised. Heras fencing in my opinion would not be enough security.	Please refer to the Applicant's response to RR-341-8. In addition, the design of hoardings and fencing around construction activities shall include consideration of the character of the surrounding landscape. Fencing and hoarding shall be kept well maintained by the Contractor throughout construction. Section 4.6 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) provides further details on site security including measures to reduce trespass risk and implement appropriate control measures. Detailed CEMP(s) will be produced by the Contractor and will set out plans and method statements substantially in accordance with the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) for relevant construction activities.
RR-341-11	Construction impacts and effects	4.4. I also have concerns over who would be working on the land and whether the contractor in charge of the work would ensure that all workers were appropriately DRB checked as they are working in the community and the proposed works will mean that operatives will come in to close contact with families and young children	Please refer to the Applicant's response to RR-341-8. In addition, the health assessment component of ES Chapter 17 Socio-economics tourism and health [APP-096] in section 17.8 considers the impact of the Project on community safety and social cohesion, including increased risks of crime and fear of crime associated with construction sites. In the context of the Project, community safety relates to potential increased opportunities for crime and increased fear of crime. Construction workers would remain within the construction sites and would not be accessing other private land. Hence, it is not expected that there will be a statutory requirement for Disclosure and Barring Service checks on construction workers. Section 4.8 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) requires the Contractor to sign up and adhere to the Considerate Constructors Scheme before commencement of the works, which would actively manage its impact on neighbours and the public to support a positive experience by ensuring courteous and respectful language and appropriate behaviour in and around the construction activity.
RR-341-12	Air quality and odour	4.5. The use of construction machinery and traffic along the pipeline route, working on the pipeline and using the surrounding roads will cause dust, dirt and emissions. One of our main concerns is HSE are extremely concerned over silica dust and people breathing this in and the impact this has on their health. As the pipework comes through our land in close proximity to our property and working hours could be six out of seven days of the week, we are concerned over our exposure to this and the impact this could have on our health and wellbeing.	The Applicant has assessed potential impacts of construction machinery (including non-road mobile machinery (NRMM)) and construction traffic within section 6.8 of Environmental Statement (ES) Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1). In accordance with Local Air Quality Management Technical Guidance (LAQM.TG(22)), appropriate mitigation has been identified and is incorporated into the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) with the mitigation measures designed such that any residual effect in relation to emissions associated with NRMM is not significant. Construction phase vehicle trips were screened against relevant assessment thresholds within section 6.8 of ES Chapter 6 Air quality and odour (Document

Reference	Theme	Issue raised	The Applicant's response
			reference 6.1, DCO Volume 6, Version 1). In accordance with the Environmental Protection UK and Institute of Air Quality Management guidance the effect of Project-generated construction phase road traffic emissions at human receptors is not significant. Construction dust risk has been assessed in section 6.8 of ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1). This has included consideration and assessment of potential impacts associated with all dust types (including silica dust) arising from any demolition, earthworks, construction and trackout (the transport of dust and dirt from construction sites onto the public road network by construction vehicles) activities in relation to dust soiling and human health. The construction dust and particulate matter assessment has been undertaken using a worst-case approach whereby areas have been identified where the maximum amount of works are assumed to be undertaken up to the Order Limits of the pipeline and in proximity to the greatest number of human receptors. This area was not identified as a worst-case location in relation to construction dust and particulate matter impacts. Notwithstanding, appropriate mitigation has been identified for all construction activities (i.e. demolition, earthworks, construction and trackout), commensurate with the highest level of dust risk assessed for each activity and is incorporated into the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) (AQ-1-AQ18). Measures specific to the use of construction machinery and traffic are detailed within AQ9-AQ15. This mitigation will be applied at all works along the entirety of the Order Limits. The mitigation is designed such that any residual effect in relation to construction dust is not significant.
RR-341-13	Traffic and transport	4.6. Winchester road already has a problem with traffic and the local village community continues to put in place schemes to reduce levels of traffic and the speed in which vehicles travel. We have had a number of fatalities on the road outside our property in the last few years and it would concern me that this could potentially increase the risk of that even more if construction traffic were to increase.	A Framework Construction Traffic Management Plan (CTMP) [APP-415] has been prepared in support of the Project and includes a number of measures to reduce potential disruption associated with construction traffic, including restrictions to Heavy Goods Vehicles (HGVs) movements in network peak hours. Construction access routes for HGVs have also been identified and agreed with Hampshire County Council and include Winchester Road but do not permit HGVs to travel along Upham Street (which routes through the village of Upham). The Environmental Statement (ES) Chapter 18 Traffic and transport [APP-097] includes an assessment of effects with regards to road safety and did not identify any significant effects during construction or operation, including along Winchester Road.
RR-341-14	Traffic and transport	4.7. Additional construction traffic would undoubtedly mean that the main road, Upham Street, which goes through the village of Upham would be used as a cut through for vehicles such as lorries and HGVs etc . This is already a huge problem for our little village and increased construction/diverted traffic coming	As noted in response to RR-341-13, Heavy Goods Vehicles (HGVs) would not be permitted to use Upham Street, and this is secured through the construction traffic routes identified in the Framework Construction Traffic Management Plan (CTMP) [APP-415].

Reference	Theme	Issue raised	The Applicant's response
		up Upham Street would have a significant impact on everyone living there and an already deteriorating road.	A Framework Construction Worker Travel Plan (CWTP) has also been prepared and can be found appended to the Framework CTMP [APP-415]. This includes several measures to reduce the proportion of construction workers travelling to the constriction compounds by car, including shuttle bus services. Coupled with the working hours which mean construction workers will travel before the AM network peak hour, the impacts of construction traffic on the local highway network are not predicted to be significant, as set out in Environmental Statement (ES) Appendix 18.1 Transport Assessment [APP-186 to APP-188 - 3 documents].
RR-341-15	Construction impacts and effects	4.8. The proposed work hours suggested include late evenings during the summer period and Saturdays, this would mean that our enjoyment and use of our garden and land would be significantly impacted. We would only have one day of the week, a Sunday, where our family life would not be impacted by the work, temporary noise and vibration from the use of construction machinery and construction compounds along the route, as well as from construction traffic using surrounding roads. As set out above our land is an extension of our garden and our property is in close proximity to the route planned. Our enjoyment of our home and land would be hugely impacted.	The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) sets out that the standard working hours for construction of the Project would be: • Monday to Friday (excluding bank holidays): 07:00 to 19:00 in summer (April-September) and 07:00 to 17:30 in winter (October-March). • Saturday: 07:00 to 17:00. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) sets out that where works are required outside of the standard working hours, the relevant local planning authority shall be notified in advance of any proposed works, whilst the Contractor's community relations personnel shall notify affected communities and other relevant stakeholders prior to the commencement of potentially disruptive construction activities. ES Chapter 15 Noise and vibration [APP-094] assesses noise and vibration on human noise and vibration sensitive receptors (NVSRs) considers the in-combination effects from construction, operation and decommissioning of the Project on residential amenity taking into account the findings of other relevant environmental assessments, including air quality, noise, landscape and visual, and traffic and transport. The assessment concluded it is not anticipated that the construction of the Pipeline in this area would result in any significant in-combination effects on amenity for residential receptors, with at most a minor adverse effect.
RR-341-16	Location of the proposed pipeline routes	5. Scale of the Project 5.1. The order limits extend to 2.22 acres of land, 30% of our land. The order limits are around 65m in width, this is completely unjustified for a pipe of 0.8m. there is any justification for the scale of the order limits and they should be dramatically reduced. The order limits could be reduced to 11m, with temporary possession taken by agreement on any further land.	The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. In this location, flexibility in the Order Limits has been so that the loss of trees at field boundaries can be reduced as far as practicable, taking account of further surveys following approval of the DCO application. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.

Reference	Theme	Issue raised	The Applicant's response
RR-341-17	Construction impacts and effects	5.2. The working width is also unreasonable, between 40m-50m in width. Again, this is unjustified and not necessary or proportionate for a pipe of 0.80m in diameter. This should be reduce to say 15-20m with any further land taken on licence.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, which is secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide the necessary space for a haul road, construction working areas, material storage areas, pipeline trench and soil storage areas. This is set out at section 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m, over a distance of a maximum of 42m. The haul road/working area must be a sufficient width to allow a suitably sized excavator to track back at 90 degrees to the pipe to lift it and then lower into the trench. A suitably sized excavator capable of carrying out a tandem lift of a string of pipes would circa 11m long hence the 11m required. The working area for the trench excavation is calculated using the width of the excavator capable of pipeline installation (circa 3.5m) and a 2m deviation of the pipeline route in each direction without compromising the pipelaying process. If the Pipeline has to change direction the joints are designed to allow a slight angle deviation to alter the direction this is a gradual process and requires sufficient space to allow for it. Therefore, a total of 7.5m. The pipe storage/jointing area must be wide enough to allow the pipes to be welded together to form the strings before lowering into the trench. As there will be welders working on this while the excavator is operating a 1m safety exclusion zone has to be in place. The total of the pipe storage/jointing area is therefore a total of 3.5m The area required for topsoil storage is based on topsoil being 200mm thick, which equates to $8m^3$ for a 40m working width. With a side slope of 1:1 and maximum height of 1.8m an area of 7m has been allocated which includes for any bulking factor. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The area required for subsoil provides enough width in this area to segregate upper and lower subsoils, therefore there would be two separate mounds, which ensures the subsoil can be reinstated properly. A 1:1 side slope and a bulking factor has been incorporated which equates to 7m. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The above areas equate to a working width of 40m. In accordance with the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition have been met.

Reference	Theme	Issue raised	The Applicant's response
			The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits, whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) sets out the maximum diameter of the pipelines for the different Project components, which may be greater than the 800mm referenced by the Respondent. The Applicant considers the permanent rights sought are justified in order to protect and preserve the integrity of the Project.
RR-341-18	Landowner engagement	6. Southern Waters Conduct to date 6.1. We have been disappointed in Southern Waters conduct to date. They, via their agents have been incompetent, and threatening at every encounter. They have gone out of their way to be difficult at every stage. They do not have any intention to work with us.	The Applicant does not recognise the accusations levelled at its approach to landowners. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with landowners and their professional advisors regarding a voluntary agreement. A meeting has been arranged for 8 December 2026 to discuss Heads of Terms and the project generally.
RR-341-19	Consultation	6.2. We took part in the public consultation in 2024 & 2025, yet our concerns have never been taken seriously and have never been addressed. The public consultations was just a formality that Southern Water gave lip-service to.	Section 47 of the PA 2008 is the duty of the Applicant to consult with the local community. The Consultation Report (APP-029) demonstrates conclusively that the Applicant has complied with the requirements of Section 47 of the PA 2008. This was also the view of all seven host local authorities when the Applicant consulted them in preparing the Adequacy of Consultation Milestone submission as part of the pre application procedure and subsequently confirmed through their Adequacy of Consultation Representations. The Planning Inspectorate concurred and the application has now been accepted. As well as undertaking statutory compliant consultations, the Applicant sought to carry out open, inclusive and proportionate pre-application consultation. The Applicant considered the Gunning Principles to make sure that consultation was fair, lawful and a worthwhile exercise for the Applicant and consultees, including landowners. Please see Table 3-1 in the Consultation Report (APP-029) for further detail about how the Applicant had regard to the Gunning Principles. Alongside formal consultation stages, the Applicant undertook ongoing engagement with landowners to inform refinements to the Project and the design of the AGP and pipeline routes. The Applicant has had regard to all feedback, which has informed the design of the Project. The Scheme Development Report (APP-073, APP-074, APP-075) and the Consultation Report (APP-029) set out the process that has been undertaken to design the Project and sets out how feedback from landowners and other stakeholders has been considered. Furthermore, following the

Reference	Theme	Issue raised	The Applicant's response
			Summer 2024 Consultation, the Statutory Consultations were largely focused on design changes that arose from considering feedback from landowners. The Applicant considered matters raised by landowners and reviewed whether alternative designs could mitigate these without introducing any new deliverability, environmental or land related risks or impacts. In the event that an alternative design would increase these risks or impacts, the alternative design may not have been progressed. A meeting has been arranged for 8 December 2026 to discuss Heads of Terms and the project generally. No route changes have been made following feedback from the respondent.
RR-341-20	Landowner engagement	6.3. The constant threat of compulsory purchase is not necessary. We understand that they have the ability to statutory take access to our private property if the Secretary of States permits, however they have not shown any intention to reach a private agreement or work with us and I find the offer within the heads if terms insulting.	During discussions with landowners, the Applicant has acted responsibly in making landowners aware of the statutory alternatives available should voluntary agreements not be reached. In relation to accessing the landowner's property to undertake surveys, the use of statutory powers under Section 172 of the Housing and Planning Act 2016 has been referenced in correspondence to ensure the respondent is aware of the statutory powers available but confirms that these would only be relied upon following reasonable attempts to secure access by voluntary agreement. The Applicant remains committed to working collaboratively with landowners and its clear preference is to secure voluntary agreements for access and the acquisition of land and rights wherever possible. As outlined in the Statement of Reasons [APP-025], the Applicant has sought to acquire the land and associated rights by voluntary agreement in order to facilitate delivery of the Project. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with landowners regarding voluntary agreements and has continued discussions with the respondent. To date, despite formally requesting evidence on 28 January 2026 demonstrating why the commercial offer extended to the respondent is considered unreasonable, the Applicant is yet to receive a response. The Heads of Terms proposed by the Applicant closely align with those adopted across other utilities and infrastructure projects, which have also been reviewed and accepted by respective land agent groups.
RR-341-21	Landowner engagement	7. Private Negotiations and Alternative to Compulsory Purchase 7.1. We understand that it is not for the planning Inspectorate to comment on the terms of any private negotiated agreements. We must comment that Southern Water have been impossible to work with. They have dictated terms, without given any consideration to amending the terms. The terms offered a significantly worse that those under compulsory acquisition.	The Applicant does not recognise the accusations levelled at its approach. The Applicant remains committed to working collaboratively with landowners and disagrees with respondent's suggestion that they have been unwilling to enter into any form of negotiations. The Applicant has made several amendments to the proposed Heads of Terms as confirmed by a relevant representation made by a member of the Land Agent Group [RR-233] and

Reference	Theme	Issue raised	The Applicant's response
			improved the commercial offer during the negotiations to demonstrate this commitment. Following the Heads of Terms being issued on 6 March 2026, the Applicant discussed the Heads of Terms with the respondent's representative at a meeting on 13 May 2026. Following this, the Applicant requested a further meeting on 17 July 2026 and after issuing a proposal for revised terms on 7 August 2026 incorporating amended provisions and improved commercial terms, sought an additional meeting with the respondent's agent on 11 September 2026, evidencing the Applicant's attempts to reach a voluntary agreement A meeting has been arranged for 8 December 2026 to discuss Heads of Terms and the project generally.
RR-341-22	Landowner engagement	7.2. They are only playing lip-service and have no intention of reaching any form of settlement with Landowners and Occupiers.	The Applicant refers to its response to RR-341-21.
RR-341-23	Landowner engagement	7.3. This is apparent from the Pre-application Land and Rights Negotiation Tracker.(Document 4.4) only 1 landowner has returned Heads of Terms out of 172 Category 1 Landowners. 99.4% of landowners have rejected the heads of terms, clearly demonstrates that the term Southern Water are not acceptable and they have not made any significant effort to reach agreement with Landowners and Interested Partys and they are relying on taking land by compulsion.	Whilst the Applicant would prefer to be able to advise the Examining Authority of a higher return of signed Heads of Terms, it does not consider this to be because the terms offered to the respondent are unreasonable. To date, despite formally requesting evidence on 28 January 2026 demonstrating why the commercial offer extended to the respondent is considered unreasonable, the Applicant is yet to receive a response. The Heads of Terms proposed by the Applicant closely align with those adopted across other utilities and infrastructure projects, which have also been reviewed and accepted by respective land agent groups. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken extensive and ongoing engagement with landowners with a view to securing the necessary land rights by voluntary agreement. The Applicant refutes the suggestion that it seeks to rely on statutory powers and confirms its preference to reach a voluntary agreement.
RR-341-24	Landowner engagement	7.4. I believe it is disingenuous to categorize me as Head of Terms negotiation ongoing (yellow status). This is not true; Southern Water have shown no interest in reaching an agreement with us. I request that my status is amended to Heads of Terms agreements unlikely before close of examination (red).	The Applicant considers that the status recorded by the Applicant in the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1) is correct given that Heads of Terms for a voluntary agreement have been issued and are being discussed with the respondent's representative. Following the Heads of Terms being issued on 6 March 2026, the Applicant discussed the Heads of Terms with the respondent's representative at a meeting on 13 May 2026. Following this, the Applicant requested a further meeting on 17 July 2026 and after issuing a proposal for revised terms on 7 August 2026 incorporating amended provisions and improved commercial terms, sought an additional meeting with the

Reference	Theme	Issue raised	The Applicant's response
			respondent's agent on 11 September 2026, evidencing the Applicant's attempts to reach a voluntary agreement. The Applicant will continue to engage with the respondent in an attempt to secure a voluntary agreement.
RR-341-25	Land use and agriculture	8. Land Quality and Water Logging 8.1. Our land can become very wet during the Winter. The soils are clayey, with impeded drainage. We wouldn't take a tractor onto our land between November and March, as they will damage the soil structure.	The Applicant confirms that seasonally wet, deep clayey soils have been identified in the Order Limits. All soils affected by construction works will be managed according to good practice principles as contained in the Outline Soil Resources Management Plan (SRMP), provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). The Outline SRMP includes protocols for determining appropriate soil handling conditions (including trafficking by machinery) in relation to soil moisture state and rainfall criteria. The soils will be managed according to industry good practice to minimise damage caused to soils, including through compaction by machinery.
RR-341-26	Land use and agriculture	8.2. We believe it will be impossible to work on the land for 4 to 5 months of the year, particularly when the top soil has been stripped and the subsoils compacted with heavy machinery. There is insufficient information within the applicants submission as how they are going to deal with this issue. How they are going to stop soil erosion and water and sediment runoff to the local streams and ditches.	Refer to response to RR-341-25. Additionally, Outline CEMP – (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) includes controls at provision WE5 to minimise sediment runoff and pollution risks and which are intended to protect nearby watercourses and drainage features during construction. Measure WE4 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) describes the implementation of a Construction Drainage Plan which will address the interception and control of surface water run-off, as well as including measures such as limiting the extent of open excavations along the pipeline, capping soil stockpiles and retaining field strips of vegetation in order to minimise erosion and sediment run-off into local watercourses.
RR-341-27	Landowner engagement	9. Conclusion 9.1. For the reasons set out above, we strongly object to the proposed Development Consent Order insofar as it affects our property and land at Inwood Cottage. The current proposals would cause significant and disproportionate interference with our family life, the enjoyment and safe use of our land, the management of our livestock, the mature trees along our boundary, local road safety, and the security and amenity of our home.	As set out by the respondent, the land is used for domestic and agricultural purposes. The Applicant acknowledges that the respondent's land will be temporarily impacted during construction of the Project but none of the restrictions set out in Schedule 5 to the Draft Development Consent Order [APP-023] will prohibit the respondent from continuing to use the land for this purpose once construction is complete. The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use land occupied by the working width but confirms that it will seek to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design once the Applicant can confirm the final working area requirements.

Reference	Theme	Issue raised	The Applicant's response
			The Applicant confirms that the associated protections for access, security and livestock management are detailed within the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), as secured by Requirement 6 of the Draft DCO [APP-023]. Contained within the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) is the Outline Soil Resource Management Plan (Appendix B) where further detail can be found on soil management. This plan also confirms that the Project will appoint an Agricultural Liaison Officer ("ALO") who will act as a liaison between landowners and the appointed contractor. The ALO will be the primary contact for ongoing engagement with landowners, occupiers and their agents about practical agricultural matters before and during construction. The Applicant confirms that the respondent may be entitled to claim compensation for reasonable crop loss and disturbance losses arising out of the temporary use of the land for construction of the Project, in line with the Compensation Code.
RR-341-28	Landowner engagement	9.2. We do not consider that the extent of the land proposed to be subject to Order limits or the proposed working width has been properly justified, nor do we consider that sufficient information has been provided to demonstrate how the applicant will adequately protect our land, trees, drainage, health, safety and security during the works. The applicant should be required to reduce the land take and working width to the minimum reasonably necessary, provide clear and enforceable protections for the affected land and trees, and engage properly and constructively with us to seek a negotiated agreement rather than relying on compulsory powers.	The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The detailed design of the Project, including the particulars of land access requirements that would be developed following grant of consent and subject to approval by the relevant authorities. Prior to undertaking detailed design as a post-consent activity, it is not possible to confirm the precise area of land required or the duration of temporary possession. The Applicant is committed to keeping landowners informed as the design evolves and will provide clarity on land use requirements as soon as practicable. As detailed within the Statement of Reasons [APP-025], temporary use possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the project. Please refer to the Applicant's responses to the protections considered for trees, drainage, health, safety and security during the works within RR-341-6, RR-341-25, RR-341-11, RR-341-8 and RR-341-9 respectively. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has sought to undertake engagement with the respondent. Since the Heads of Terms were issued on 6 March 2026 the Applicant received confirmation on the 30 March 2026 that the respondent rejected the terms and did not want to meet the Applicant. The Applicant then discussed

Reference	Theme	Issue raised	The Applicant's response
			the Heads of Terms with the respondent's representative at a meeting on 13 May 2026. Following this, the Applicant requested a further meeting on 17 July 2026 and, after proposing revisions to the Heads of Terms on 7 August 2026 incorporating amended provisions and improved commercial terms, sought an additional meeting with the respondent's agent on 11 September 2026, evidencing the Applicant's attempts to reach a voluntary agreement. The Applicant remains committed to working collaboratively with landowners and disagrees with respondent's suggestion that they have been unwilling to enter into any form of negotiations.
RR-341-29	Landowner engagement	9.3. We therefore request that the Examining Authority gives full consideration to these objections and requires Southern Water to amend its proposals, provide further detailed safeguards, and demonstrate that any compulsory acquisition or temporary possession is necessary, proportionate and justified.	The Applicant notes this comment. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance.

Table 2-65 The Applicant's response to RR-343 from Ian Judd and Partners on behalf of Maureen Holmes

Reference	Theme	Issue raised	The Applicant's response
RR-343-1	Greeting	Please see supporting email. 1. Key Information Name of Interest party: [REDACTED] Address: [REDACTED] Email Address: [REDACTED]@hotmail.co.uk Telephone Number: : [REDACTED]	The Applicant notes this comment.
RR-343-2	Landowner engagement	Name & Address of Property Affected: Winchester Road/Mortimers Lane Land Plan Reference No: 21-017 5596 m2 1.38 acres - Acquisition Rights requested Linear length of pipe: 88m Use of Land: Equestrian Interest Parties on my land: Rupert & Natasha Hulme Land Agent Instructed: Ian Judd and Partners, 4 High Street, Bishops Waltham, Southampton, Hampshire, SO32 1AB 01489 896422 [REDACTED]@ianjuddandpartners.co.uk	The Applicant notes this comment.

Reference	Theme	Issue raised	The Applicant's response
RR-343-3	Principle of development	2. Summary of Submission 2.1. I wish to become an interested party and submit my strongest objection to this Development Consent Order Application.	The Applicant acknowledges the respondent's position.
RR-343-4	Landowner engagement	3. Summary of Land Use 3.1. Maureen owns a total of 4.76 acres (1.92ha) of land south of Winchester Road, Lower Upham. The land is used for the grazing of horses, alongside other recreational uses. 3.2. The proposed scheme is going to occupy 1.38 aces and leave 0.26 acres severed. A third of the land would be unusable during the construction period.	The Applicant notes this comment. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs. The Applicant will continue to engage with the landowners and occupiers on the difficulties they may encounter during construction activities, in order to explore potential mitigations further. The Applicant confirms that compensation will be paid for any reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-343-5	Landowner engagement	4. Need for Compulsory Purchase Powers 4.1. The Department for Communities and Local Government, Planning Act 2008, Guidance related to Procedures for the compulsory acquisition of land (CA Guidance), sets out the requirements Acquiring Authorities should meet to be granted CPO powers.	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance.
RR-343-6	Landowner engagement	4.2. Para 6. "provides that a development consent order may only authorise compulsory acquisition if the Secretary of State is satisfied that: the land is required for the development to which the consent relates, or is required to facilitate, or is incidental to, the development,".	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or

Reference	Theme	Issue raised	The Applicant's response
			• there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance.
RR-343-7	Landowner engagement	4.3. Para 8. "The applicant will also need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate"	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-343-8	Landowner engagement	4.4. Para 9. "The applicant must have a clear idea of how they intend to use the land which it is proposed to acquire.	The Applicant's proposed use of the land is set out in the Works Plans [APP-014] with detail of each Works Number set out in 'Schedule 1 – Authorised Development' to the Draft Development Consent Order [APP-023]. The respondent is affected by 'Works No.4 – Pipeline between the WRP site and Otterbourne WSW' for which the Applicant is seeking the acquisition of rights and temporary possession powers as set out in Sheet 21 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2).
RR-343-9	Landowner engagement	4.5. Para 11. Section 122 of the Planning Act sets out two conditions which must be met to the satisfaction of the Secretary of State before compulsory acquisition can be authorised. The first of these is related to the purpose for which compulsory acquisition is sought. These three purposes are set out in section 122(2): (i) the land is required for the development to which the development consent relates For this to be met, the applicant should be able to demonstrate to the satisfaction of the Secretary of State that the land in	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or

Reference	Theme	Issue raised	The Applicant's response
		question is needed for the development for which consent is sought. The Secretary of State will need to be satisfied that the land to be acquired is no more than is reasonably required for the purposes of the development. (ii) the land is required to facilitate or is incidental to the proposed development. An example might be the acquisition of land for the purposes of landscaping the project. In such a case the Secretary of State will need to be satisfied that the development could only be landscaped to a satisfactory standard if the land in question were to be compulsorily acquired, and that the land to be taken is no more than is reasonably necessary for that purpose, and that is proportionate.	• there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-343-10	Location of the proposed pipeline routes	4.6. We believe that part the land included within the order limits is not necessary to facilitate the scheme and it volume of land taken is not proportionate.	The Applicant notes this comment and in accordance with the Statement of Reasons [APP-025] and as set out in the Applicant's responses to RR-343-6, RR-343-7 and RR-343-9, the Applicant considers that the relevant tests for compulsory acquisition have been met. The Applicant has included the minimum amount of land necessary to deliver the authorised development within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. As detailed within the Statement of Reasons [APP-025], temporary use possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the Project.
RR-343-11	Location of the proposed pipeline routes	4.7. On our property the order limits extending to 1.38 acres for 88 linear meters of pipe, which equates to an average of 63m in width, with a maximum width of around 130m. This is not proportionate and is excessive.	Please refer to the Applicant's response to RR-343-13.
RR-343-12	Location of the proposed pipeline routes	4.8. The proposed order limits is excessively wide, and it does not align with the order limits area of the adjacent landowner to the north, based on the "zoomed out" plans we have seen. Our option area is wider than that neighbour which does not make sense - the option areas should be aligned and of the same width. There can be no justification for this at such an early stage before design. We are therefore potentially more disadvantaged than our neighbour.	The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. In this location, flexibility in the Order Limits has been proposed by providing flexibility in where the working width will be positioned so that the loss of trees at field boundaries can be reduced as far as practicable, taking account of further surveys following approval of the DCO application. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the

Reference	Theme	Issue raised	The Applicant's response
			design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-343-13	Location of the proposed pipeline routes	4.9. The Acquiring Authority have not provided any justification for the scale/quantum of the Order Limits. They have stated (Para 3.3.3 Document Reference 4.1) that the maximum working width is 40m. Yet later (para 3.3.1 Document Reference 4.1- please note numbering error in document) the working width may be up to 50m.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m for a maximum length of 42m.
RR-343-14	Location of the proposed pipeline routes	4.10. We understand that Southern Water have chosen not to undertake detailed design and want an element of flexibility, this flexibility could be reduced to 20m in width. It is clear that the scale of the Order Limits significantly more than is reasonably necessary or proportionate for a pipe that 0.8 in width.	The design of the Project as set out in the DCO application provides flexibility for refinement informed by further surveys and investigations at the detailed design stage. The detailed design will be developed following approval of the DCO application and the appointment of a Contractor. This approach ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs. The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m for a maximum length of 42m.
RR-343-15	Location of the proposed pipeline routes	4.11. There is nothing within their submission that provides an justification for this excessive width of the order Limits.	Please refer to the Applicant's response to RR-343-13.

Reference	Theme	Issue raised	The Applicant's response
RR-343-16	Location of the proposed pipeline routes	5. Scale of the Working Area 5.1. The justification for the working width is lacking any reality, below is an exact Graphic 3-3 Para 3.5.92 document Reference 6.1. 5.2. This has a Working Area and Haul Road of 11m and a pipe trench 4m wide. This is excessive, yet only totals 15m in width. They want a further 25m for topsoil and subsoil storage.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, which is secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3)). This would provide the necessary space for a haul road, construction working areas, material storage areas, pipeline trench and soil storage areas. This is set out at section 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3)). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m, over a distance of a maximum of 42m. The haul road/working area must be a sufficient width to allow a suitably sized excavator to track back at 90 degrees to the pipe to lift it and then lower into the trench. A suitably sized excavator capable of carrying out a tandem lift of a string of pipes would circa 11m long hence the 11m required. The working area for the trench excavation is calculated using the width of the excavator capable of pipeline installation (circa 3.5m) and a 2m deviation of the pipeline route in each direction without compromising the pipelaying process. If the pipeline has to change direction the joints are designed to allow a slight angle deviation to alter the direction this is a gradual process and requires sufficient space to allow for it. Therefore, a total of 7.5m. The pipe storage/jointing area must be wide enough to allow the pipes to be welded together to form the strings before lowering into the trench. As there will be welders working on this while the excavator is operating a 1m safety exclusion zone has to be in place. The total of the pipe storage/jointing area is therefore a total of 3.5m The area required for topsoil storage is based on topsoil being 200mm thick, which equates to $8m^3$ for a 40m working width. With a side slope of 1:1 and maximum height of 1.8m an area of 7m has been allocated which includes for any bulking factor. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The area required for subsoil provides enough width in this area to segregate upper and lower subsoils, therefore there would be two separate mounds, which ensures the subsoil can be reinstated properly. A 1:1 side slope and a bulking factor has been incorporated which equates to 7m. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The above areas equate to a working width of 40m.

Reference	Theme	Issue raised	The Applicant's response
RR-343-17	Location of the proposed pipeline routes	5.3. I have undertaken a simple calculation of what may be needed as a working width - The Haul Road may be 3m wide, with occasional passing places, - Working area 8m, this allows 6m of digger working area, plus 2m pipe storage - Pipe width - this will be 1.5m plus say 1.5m each side of pipe = 4.5m - Topsoil Storage - A fair estimate is assume 150mm of top soil, across 20m equates to 3m³ of top soil, stacked at 1:2, say 2.5m x 1.25m = 3.75m³, therefore 2.5m for topsoil storage. - Sub-soil Storage - If the trench is 4 wide and assume a depth of 2m (2.15m below ground level) deep 7.5m³ of subsoil, again assume 1:2 stack equates to 4m of subsoil storage. - Excess 2m excess for fencing and other uses - Total working area required - 24m in width	Please refer to the Applicant's response to RR-343-16.
RR-343-18	Location of the proposed pipeline routes	5.4. It is completely unjustified, unreasonably, unnecessary for the purpose, and disproportionate to permit a working area greater than 24m in width for open cut sections of pipe	Please refer to the Applicant's response to RR-343-16.
RR-343-19	Landowner engagement	5.5. If Southern Water wish to used additional space this can be done by agreement at a market rent with individual landowners.	The Applicant has been seeking voluntary agreements for all land identified for temporary possession. Details of this engagement can be found within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1). As detailed within the Statement of Reasons [APP-025], temporary use possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the project. Whilst the Applicant's preference is to reach a voluntary agreement, it considers that the temporary possession powers sought within the DCO are necessary to ensure that the Project can be delivered where agreement cannot be reached. The Applicant therefore considers that the temporary possession powers sought are justified and proportionate, whilst maintaining that a voluntary agreement remains its preferred outcome where possible.
RR-343-20	Location of the proposed pipeline routes	6. Scale of Easement Width 6.1. We haven't been provided any justification of the easement width restriction. Southern Water requested a 11m easement for open cut , with permanent restriction place on this land. Yet for tunnelled section the easement has been reduced to 5m. This hasn't been justified.	The purpose of the easement is to protect the integrity and operational requirements of the pipeline and to ensure appropriate access for inspection, maintenance, repair and replacement activities. The required width has been determined following a detailed technical assessment, taking account of the pipeline's diameter, depth, construction methodology, location and operational function.

Reference	Theme	Issue raised	The Applicant's response
			For sections of pipeline installed using open-cut construction, the Applicant is seeking an easement width of 11m (5.5m either side of the pipeline). This reflects the access and operational requirements associated with maintaining and, if necessary, excavating the pipeline in the future. Notably, this represents a reduction from the Applicant's published stand-off guidance for water mains of a comparable size and depth [1], which would typically require a wider protected corridor. This reduction from the normal requirement has been communicated to landowners and their agents where this is being challenged. For sections constructed using trenchless techniques, a reduced easement width is considered appropriate, taking into account depth, construction methodology and location. As the pipeline is installed at greater depth and future maintenance or operational access would be undertaken from either side of the trenchless section rather than directly above it, the same level of restriction is not required. The easement width has therefore been tailored to reflect the differing operational requirements of the construction methodologies. The Applicant is therefore satisfied that the easement widths proposed represent the minimum reasonably required to protect the pipeline and secure its safe operation over its lifetime.
RR-343-21	Location of the proposed pipeline routes	6.2. We have assessed other water providers easement width and the typical easement width for an 800mm pipe is 8m total width.	Please refer to the Applicant's response to RR-343-20. In accordance with the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition have been met. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits, whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) sets out the maximum diameter of the pipelines for the different Project components, which may be greater than the 800mm referenced by the Respondent. The Applicant considers the permanent rights sought are justified in order to protect and preserve the integrity of the Project.
RR-343-22	Location of the proposed pipeline routes	6.3. We have requested justification for this easement width; this hasn't been supplied. We therefore believe this is unreasonable, unjustified and disproportionate and should be reduced.	Please refer to the Applicant's response to RR-343-20.
RR-343-23	Consultation	7. Southern Waters Conduct to date 7.1. We have been disappointed in Southern Waters conduct to date. Their communication has been poor, significantly below what should be expected of a competent acquiring authority. They have not been able to satisfactorily address our concerns and have made limited effort to work with us.	The Applicant does not agree with this characterisation of the Applicant's conduct to date. The Consultation Report [APP-029] and Statement of Engagement [APP-072] sets out the extensive pre-application consultation and engagement activities undertaken for the Project, including both non-statutory and statutory consultation. Within these are reported the Applicant's activities performed

Reference	Theme	Issue raised	The Applicant's response
			under Section 42(1)(d) and Section 44 of the Planning Act 2008 with regard to landowner engagement. The Applicant is committed to working collaboratively with landowners and has engaged directly with the respondent 's representative and the respondent's land agent on a number of occasions. The Applicant issued populated Heads of Terms to the respondent on 6 March 2026. The Applicant held a meeting with the respondent's representative on 19 March 2026 to discuss the Heads of Terms, following which the respondent instructed a land agent to act on their behalf. The Applicant spoke with the respondent's representative again on the 26 August 2026 to answer further queries and issued an updated version of the Heads of Terms via email to the respondent's representative and land agent on the same day for further review. The Applicant has since had communication from the respondent's land agent confirming that they are unwilling to meet with the Applicant until the Applicant is willing to enter into negotiations on the commercial terms. The Applicant does not consider the terms offered to landowners to be unreasonable. The Heads of Terms proposed by the Applicant closely align with those adopted across other utilities and infrastructure projects, which have also been accepted by respective land agent groups. The Applicant understands the main point of contention by the land agent to be the commercial offer and considers the land agent's position on commercial terms to be unrealistic and significantly in excess of actual losses incurred by affected parties as a result of the rights sought by the Project. The respondent's land agent has been provided with justification for the Applicant's position on commercial values on numerous occasions but is maintaining their high expectation.
RR-343-24	Landowner engagement	8. Private Negotiations and Alternative to Compulsory Purchase 8.1. We understand that it is not for the planning Inspectorate to comment on the terms of any private negotiated agreements. We must comment that Southern Water have been impossible to work with. They have dictated terms, without given any consideration to amending the terms. The terms offered a significantly worse that those under compulsory acquisition. We found the monetary offer for our land insulting and significantly less than depreciation in our land by having this unwanted pipe.	The Applicant does not recognise the accusations levelled at its approach. The Applicant remains committed to working collaboratively with landowners and disagrees with respondent's suggestion that they have been unwilling to enter into any form of negotiations. The Applicant has made several amendments to the proposed Heads of Terms as confirmed by a relevant representation made by a member of the Land Agent Group [RR-233] and improved the commercial offer during the negotiations to demonstrate the Applicant's preference for reaching voluntary agreement with landowners. The Applicant does not accept that the terms offered are worse than under compulsory acquisition. The Applicant invited evidence from the representative's land agent on 28 January 2026 substantiating this claim but to date the Applicant is yet to receive a response. Following the Heads of Terms being issued on 6 March 2026, the Applicant discussed the Heads of Terms with the respondent's representative at a meeting on 13 May 2026. Following this, the Applicant requested a further meeting on 17 July 2026 and after issuing a proposal for revised terms on 7 August 2026 incorporating amended provisions and improved commercial terms, sought an additional meeting with the respondent's agent on 11

Reference	Theme	Issue raised	The Applicant's response
			September 2026, evidencing the Applicant's attempts to reach a voluntary agreement.
RR-343-25	Landowner engagement	8.2. They are only playing lip-service and have no intention of reaching any form of settlement with Landowners and Occupiers. This is apparent from the Preapplication Land and Rights Negotiation Tracker. (Document 4.4) only 1 landowner has returned Heads of Terms out of 172 Category 1 Landowners. The one that has been return is a middle section of a drill section, so no above ground access is needed. 99.4% of affected landowners have not agreed to the heads of terms offered. This demonstrates that Southern Water have not made any significant effort to reach agreement with Landowners and Interested Partys and they are relying on taking land by compulsion.	Whilst the Applicant would prefer to be able to advise the Examining Authority of a higher return of signed Heads of Terms, it does not consider this to be because the terms offered to the respondent are unreasonable. To date, despite formally requesting evidence demonstrating why the commercial offer is considered unreasonable on 28 January 2026, the Applicant is yet to receive a response. The Heads of Terms proposed by the Applicant closely align with those adopted across other utilities and infrastructure projects, which have also been reviewed and accepted by respective land agent groups. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken extensive and ongoing engagement with landowners with a view to securing a voluntary agreement. The Applicant refutes the suggestion that it seeks to rely on statutory powers and confirms its preference to reach a voluntary agreement.
RR-343-26	Landowner engagement	8.3. Not a single Option Agreements have been entered into.	Whilst the Applicant would prefer to be able to advise the Examining Authority of a higher return of signed Heads of Terms and progress to Option Agreements, it does not consider this to be because the terms offered to landowners are unreasonable. To date, despite formally requesting evidence demonstrating why the commercial offer is considered unreasonable on 28 January 2026, the Applicant is yet to receive a response. The Heads of Terms proposed by the Applicant closely align with those adopted across other utilities and infrastructure projects, which have also been reviewed and accepted by respective land agent groups
RR-343-27	Landowner engagement	8.4. I believe it is disingenuous to categorize me as"Head of Terms negotiation ongoing" (yellow status). This is not true, Southern Water have shown no interest in reaching an agreement with us. I request that my status is amended to "Heads of Terms agreements" unlikely before close of examination (red).	The Applicant considers that the status recorded by the Applicant in the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1) is correct given that Heads of Terms for a voluntary agreement have been issued and are being discussed with the respondent's representative, the status has been reflected accordingly. Following the Heads of Terms being issued on 6 March 2026, the Applicant discussed the Heads of Terms with the respondent's representative at a meeting on 13 May 2026. Following this, the Applicant requested a further meeting on 17 July 2026 and after issuing a proposal for revised terms on 7 August 2026 incorporating amended provisions and improved commercial terms, sought an additional meeting with the respondent's agent on 11 September 2026, evidencing the Applicant's attempts to reach a voluntary agreement. The Applicant will continue to engage with the respondent in an attempt to secure a voluntary agreement. The Applicant most recently met with the

Reference	Theme	Issue raised	The Applicant's response
			respondent and their representative on site on the 17 November 2026 to discuss their feedback further.
RR-343-28	Landowner engagement	8.5. There appears to be no provision for payment for the loss of use of this land for the period when construction is happening. Our understanding is that disturbance does not cover the loss of enjoyment or use of the land during the work which may take many months or years. This is unfair	The Applicant confirms that within the Heads of Terms first issued to the respondent on 6 March 2026 and subsequent amendments proposed on the 7 August 2026 include compensation provisions. Reasonable losses incurred by landowners arising out of the temporary use of land will be reimbursed in line with the Compensation Code. Whilst the Applicant's preference is to reach a voluntary agreement, it considers that the temporary possession powers sought within the DCO are necessary to ensure that the Project can be delivered where agreement cannot be reached. As detailed within the Statement of Reasons [APP-025], temporary use possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the project.
RR-343-29	Land use and agriculture	9. Land Quality and Water Logging 9.1. Our land can become very wet during the Winter. The soils are clayey, with impeded drainage.	The Applicant confirms that seasonally wet, deep clayey soils have been identified in the Order Limits. All soils affected by construction works will be managed according to good practice principles as contained in the Outline Soil Resources Management Plan (SRMP), provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3).The controls contained in the SRMP ensure that soils are only worked or traversed by machinery when in a suitably dry condition.
RR-343-30	Water environment	9.2. There is insufficient information within the applicants submission as how they are going to deal with flooding, surface water run-off. How they are going to stop soil erosion and water and sediment runoff to the local streams and ditches.	The Applicant acknowledges the Respondent's comments regarding concerns about run-off, flooding and erosion. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) sets out measures that will be implemented to manage drainage, prevent erosion of exposed soils and limit the supply of fine sediment to the surface drainage network during construction, including: • WE4: A Construction Drainage Plan will be prepared by the Contractor to manage the quality and quality of construction stage drainage. • WE5: The Construction Drainage Plan will incorporate measures to reduce/remove the risk of sediment entrainment. Detailed flood risk assessments of the Pipeline route, including land adjacent to Mortimers Lane and Winchester Road near Lower Upham, are presented in Environmental Statement (ES) Appendix 19.1 Flood Risk Assessment [APP-189]. This concludes that the Pipeline is appropriate for the location, the identified measures appropriately manage flood risk during the construction phase and would not result in an increase in off-site flood risk. Furthermore, the assessment presented in ES Chapter 19 Water environment) Document reference 6.1, DCO Volume 6, Version 1) would not result in

Reference	Theme	Issue raised	The Applicant's response
			significant adverse effects on flood risk or water quality in the local drainage network.
RR-343-31	Construction impacts and effects	9.3. How can we the landowner stop the contactors if the ground conditions become detrimental to work in.	The Applicant considers that there are adequate controls within the Outline Soil Resource Management Plan (Outline SRMP), provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), to ensure that the soils are only worked or traversed by machinery when in a suitable condition. The monitoring protocols include live, ongoing monitoring of the soil moisture state as well as rainfall criteria. The Outline SRMP also highlights the appointment of an Agricultural Liaison Officer (ALO) who will be the primary point of contact for landowners to raise concerns during construction. The roles of the ALO are set out in paragraph B.2.16 of the Outline CEMP and include undertaking site inspections during construction to monitor working practices including the implementation of soil handling methodologies.
RR-343-32	Construction impacts and effects	9.4. The timing of any pre-construction inspection is probably vital. From our experience as landowners, heavy working this area in the winter will be difficult and cause project challenges and land damage. We ask that the preconstruction inspection is only done in the winter and wetter months to better perform the assessment and to help with decisions on scheduling works at a time which mitigates any such difficulties	The Outline Soil Resource Management Plan (Outline SRMP), provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), sets out the measures that would be adopted in installing the Pipeline to minimise the long-term effects on agricultural land, particularly by restoring land used temporarily for the installation of the Pipeline to its original quality. These measures include the accurate recording of soil properties and depths, the appropriate timing of works in relation to weather and soil conditions, the use of appropriate plant and equipment and the use of experienced soil specialists to supervise and advise on soil handling and restoration works. The Applicant acknowledges the suggestion of timing pre-construction surveys to be done in the wetter and winter months. Pre-construction survey scheduling will be developed by the contractor as part of the detailed design process.
RR-343-33	Landscape and visual	10. Trees 10.1. To the northwest boundary within the option area there is a row of very mature trees, including oaks, which we understand form part of the historical "Park Lug" which was the boundary of Bishops Waltham Palace. We do not know whether these trees are officially protected, and we suggest that Southern Water need to check this as well as consider the historical significance of those trees which are a visual amenity. Importantly, we note that there is a natural "gap" in that tree / hedgerow boundary which we suggest could be used as a route for the pipeline which would avoid unnecessarily damaging or destroying these historic and mature trees. We mention this point as, to our knowledge, our land has not visited or inspected, and so the historical significance or mitigation possibilities cannot have been assessed by Southern Water or its agents.	The land was visited by our tree surveyors to survey the existing tree features within the Order Limits in 2024. Access was agreed with the respondent and their tenant via a voluntary access licence. The outcomes of the assessment are included in the ES Appendix 13.5 Arboricultural Impact Assessment [APP-175 to APP-176 - 2 documents]. These mature trees are not officially protected by Tree Preservation Order (TPO) or by being located in a Conservation Area (CA). They form part of the historic boundary and have value as elements that contribute to parkland character as a tree group rather than as individual trees. Loss of mature trees would be minimised in detailed design and through reduced working width proposed in this area as set out in the Outline CEMP Appendix A - 2 of 3 documents [APP-413]. As per the Design Principles Document [APP-076], existing landscape features, wildlife corridors and vegetation within the Order Limits will be

Reference	Theme	Issue raised	The Applicant's response
			retained and protected to the extent it is reasonably practicable to do so having regard to the nature of the works proposed, to maintain visual continuity and ecological connectivity. Where the removal of vegetation (on land that would not contain above ground structures) during construction cannot be avoided, reinstatement planting will be undertaken as secured through the Outline CEMP [APP-412 to APP-414 - 3 documents] and Outline LEMP [APP-420]. Loss of existing habitat and landscape features will be mitigated with replacement planting undertaken as close to the location of the existing vegetation as practicable as secured through the Outline Landscape and Ecology Management Plan [APP-420], subject to the restrictions set out in paragraphs 3.4.12 to 3.4.16. The land has been visited by our tree surveyors to survey the existing tree features within the Order Limits on 17 July 2024.

Table 2-66 The Applicant's response to RR-345 from Timothy Nelson Mason

Reference	Theme	Issue raised	The Applicant's response
RR-345-1	Landowner engagement	The final proposal must make account of disruption both to landowners property, its use and any impact following the works where ongoing maintenance and any access may be required and to public infrastructure, including road and rail both for the works and access to the works during and after the works are complete.	The Applicant confirms that protection for access, drainage and soils is included within the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and the Outline Soil Resource Management Plan at Appendix B therein. The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements will be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant has also made a specific commitment relating to maintaining access for landowners where reasonably practicable, which will be secured through the DCO and associated management plans. This measure is outlined in the Commitments Register (ES Appendix 5.5) [APP-108] reference Mit-GT 248. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-345-2	Location of the proposed pipeline routes	The final adopted route must follow the least disruptive route for private landowners first making use of land adopted by national infrastructure parties such as highways England and Network rail.	Using National Highways and Network Rail's land for development of the Project would have significant impacts on these undertaker's operations and the deliverability of the Project. Firstly, this approach would likely require the closure of the railway lines and sections of the Strategic Road Network which would have a major impact on transport routes used by the local community. Secondly, developing the Project alongside railway lines and the Strategic Road Network presents technical challenges that would not be encountered if undeveloped or unconstrained land were used. This would prolong the

Reference	Theme	Issue raised	The Applicant's response
			construction programme, further increasing potential impacts on the local community and the environment.
RR-345-3	Location of AGP	Similarly above ground plant requiring ongoing access and maintenance must be located on public land not private where it may preclude or affect future uses	The Applicant has undertaken an extensive site selection process to identify sites for the AGP, as set out in the Scheme Development Report [APP-073, APP-074, APP-075]. Utilising publicly owned land would severely constrain the potential site options, which would potentially result in the progression of sites that have greater impacts on the environment and local community whilst restricting the deliverability and operability of the Project.

Table 2-67 The Applicant's response to RR-348 from Tracy McCormack

Reference	Theme	Issue raised	The Applicant's response
RR-348-1	Location of the proposed pipeline routes	The extreme close proximity to my house.	The Respondent's property is located approximately 150m from the closest part of the Order Limits, as shown on Sheet 26 of the Works Plans – 3 of 3 documents [APP-014]. The Order Limits provide flexibility for the Pipeline to be located within a wide area at this location, and this will depend on the location of the connection into Otterbourne WSW. There is potential for construction works to be located further than 150m from the Respondent's property. Construction activities would be managed as per the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) in order to avoid and reduce related impacts.
RR-348-2	Public Rights of Way (PRoW)	Concerns about re routing of a footpath which will impact security and privacy issues and leave me very vulnerable.	The applicant acknowledges the concerns of the Respondent regarding the rerouting of a footpath and the impact this may have on security and privacy. A Framework Rights of Way Management Plan (RoWMP) has been prepared that sets out all the planned temporary and permanent changes to the Public Rights of Way (PRoW) network, and can be found appended to the Framework Construction Traffic Management Plan (CTMP) [APP-415]. This management plan has been developed in consultation with Hampshire County Council. All temporary diversions are proposed within the Order Limits and are mostly short distance.
RR-348-3	Noise and vibration	Severe concerns about noise, light and dust pollution given the close proximity of the build.	The construction and operational phase noise and vibration impacts of the project have been assessed, as reported in Environmental Statement (ES) Chapter 15 Noise and vibration [APP-094]. With reference to the Construction noise and vibration assessment, set out in ES Appendix 15.1 Construction noise and vibration assessment [APP-179], this dwelling is represented in the assessment by (R151 and R156) and will be mainly affected by construction noise associated with the shaft construction and microtunneling. As a minimum all construction noise impacts/effects would be mitigated through the implementation of Best Practicable Means with additional noise and vibration mitigation measures where required. The Outline CEMP

Reference	Theme	Issue raised	The Applicant's response
			(Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) provides potential mitigation options, the final package of noise mitigation will be identified in a Noise and Vibration Management Plan to be submitted to each Local Planning Authority for approval prior to commencement of construction. The likely operational noise effects are assessed in ES Chapter 15 Noise and vibration [APP-094]. Table 15-41 shows that the unmitigated operational noise at R156, close to the Invasive Non-Native Species (INNS) Treatment at Otterbourne WSW, would result in an effect of moderate significance. As likely significant effects are predicted at R156, secondary mitigation measures have been identified in ES Appendix 15.3 Operational noise assessment [APP-181], namely that the building fabric of the INNS Treatment plant building will need to be upgraded. With this mitigation the potential for noise disturbance at R156 and neighbouring properties would be unlikely. Furthermore, as noted in the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1), 'Site Specific Design Principles' (SSDPs) for are provided pursuant to noise, stating: *"Detailed design will ensure that operational noise levels at noise sensitive receptors do not exceed the Lowest Observed Adverse Effect Level, as identified in ES Chapter 15 Noise and vibration. Mitigation measures will be adopted according to the following mitigation hierarchy:* *• Avoidance of noise and vibration* *• Control of noise and vibration at source* *• Implement good practice environmental noise management measures* *• Mitigate the propagation pathway, for example by introducing boundary screening"* These SSDPs provide a level of surety that the noise from operation of the Project will not adversely affect residential property or cause a loss of amenity. The Applicant has assessed the potential impacts of construction dust and particulate matter emissions within section 6.8 of the ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1). The assessment takes a worst case approach by identifying locations along the pipeline route where construction activity is expected to be the most intensive and where the greatest number of receptors are located in close proximity to the Project. Mitigation measures to control dust emissions are then identified, commensurate to the level of risk for each activity as set out within the Institute of Air Quality Management guidance on the assessment of dust from demolition and construction (v2.2 2024). The level of risk of each construction phase activity is presented within section 6.8 of ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1). These commensurate controls are detailed within environmental measures AQ1 to

Reference	Theme	Issue raised	The Applicant's response
			AQ18 as outlined in Table 5-1 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). With the implementation of mitigation measures commensurate to the highest level of risk assessed, the effect of construction dust and particulate matter emissions from the Project is considered to be not significant. It is noted that the respondents' property is located more than 90m from the Order Limits and therefore does not represent a worst-case location in terms of sensitivity to dust soiling or human health impacts from construction dust, relative to other areas along the Order Limits. Notwithstanding this, mitigation measures commensurate to the highest level of risk for the whole Project will be implemented across all work areas, including in the vicinity of Greenacres drive.
RR-348-4	Water environment	Concerns environmentally as this will considerably alter the flood plain areas, which in the past few years with the extreme rainfall has caused major flooding around the area that the build is going to be centered and in fact numerous houses have been under water.	The Applicant acknowledges the Respondent's comments regarding the sensitivity of the location with regards to flood risk. Measure WE4 in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) secures a commitment for the Contractor to prepare a Construction Drainage Plan to minimise impacts on flood risk and manage the quantity of construction-stage drainage. Specifically, the Construction Drainage Plan will include measures to reduce water within the working area and ensure ongoing drainage of surrounding land. In addition, Measure WE10 in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) secures a commitment for the Contractor to undertake a risk assessment to ensure the Project does not increase flood risk outside the site where the works are located within an area at risk of surface water, coastal or fluvial flooding. On the basis of these measures, Environmental Statement Appendix 19.1 Flood Risk Assessment [APP-189], which takes into account climate change allowances, concludes that the Project is situated in an appropriate location with regards to flood risks on the floodplains around Otterbourne, flood risks would be appropriately controlled during the construction and operational phases, and there would be no increase in off-site flood risk.
RR-348-5	Consultation	I do not think much thought has been given to where this site should be housed and has been rushed with not enough engagement to the local community as a whole.	Multiple pre-application consultations have been carried out throughout the development of the Project, presenting materials of appropriate detail at each stage. Additionally, the Applicant has had regard to all feedback, which has informed the design of the Project. The consultation carried out, as well as consideration and regard had to relevant responses received to consultation, has been set out in the Consultation Report [APP-029]. The Summer 2022 Consultation appropriately addressed the process undertaken to select the Project, pipeline corridor options, zones for above ground plant, and the proposed site for the Water Recycling Plant, and the Summer 2024 Consultation included material which described the design development process since the Summer 2022 Consultation. The site selection process for above ground plant has been extensively reviewed and reported in

Reference	Theme	Issue raised	The Applicant's response
			the Scheme Development Report [APP-073].Section 47 of the PA 2008 is the duty of the Applicant to consult with the local community. The Consultation Report [APP-029] demonstrates conclusively that the Applicant has complied with the requirements of Section 47 of the PA 2008. This was also the view of all seven host local authorities when the Applicant consulted them in preparing the Adequacy of Consultation Milestone submission as part of the pre application procedure and subsequently confirmed through their Adequacy of Consultation Representations. The Planning Inspectorate concurred and the application has now been accepted.

Table 2-68 The Applicant's response to RR-351 from Ian Judd and partners on behalf of Victor Hill

Reference	Theme	Issue raised	The Applicant's response
RR-351-1	Landowner engagement	Please see the supporting information sent by email Relevant Representation Prepared on Behalf of Victor Frederick Stephen Hill In Relation to Hampshire Water Transfer and Water Recycling Project 1. Key Information Name of Interest party: Victor Frederick Stephen Hill Business Name: VW Hill & Sons Address: Marwell Manor Farm, Portsmouth Road, Fishers Pond, Eastleigh, Southampton SO50 7HF Email Address: [REDACTED]@btconnect.com Telephone Number: [REDACTED] Name & Address of Property Affected: Marwell Manor Farm. Land Plan Reference No: 22-008- 34,288m² Acquisition of Rights 22-009 1287m² Acquisition of Rights Use of Land: Arable Production and Grassland Interest Parties on my land: V W Hill & Sons Land Agent Instructed: Ian Judd and Partners, 4 High Street, Bishops Waltham, Southampton, Hampshire, SO32 1AB 01489 896422 [REDACTED]@ianjuddandpartners.co.uk	The Applicant notes this comment.
RR-351-2	Principle of development	2. Summary of Submission 2.1. I wish to become an interested party and submit my strongest objection to this Development Consent Order Application.	The Applicant acknowledges the respondent's position.
RR-351-3	Landowner engagement	3. Summary of Land Use 3.1. I am an arable farmer and together with my wife own land at Marwell Manor Farm. The land is used for arable crop production, alongside a beef herd of cows and grain store.	The Applicant notes this comment.
RR-351-4	Landowner engagement	4. Impact on Business 4.1. The business impact of the loss of the field for the duration of the works	The Applicant acknowledges that the respondent's land will be impacted by open-cut trenching construction methodology for construction of the pipeline.

Reference	Theme	Issue raised	The Applicant's response
		and the loss for many years after to allow the soils to settle and nutrient to return to the soil.	The Applicant has identified a need for a 40m working width in areas where the pipeline is constructed by open-cut trenching. The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use land occupied by the working width but confirms that it will seek to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design once the Applicant can confirm the mitigated extent of the working width required and location of the pipeline route. The Outline Soil Resources Management Plan (SRMP), provided at Appendix B of the Outline CEMP - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), highlights the appointment of an Agricultural Liaison Officer ("ALO") who will be the primary point of contact for landowners to raise concerns during construction. The roles of the ALO are set out in paragraph B.2.16 and include the undertaking of site inspections during construction to monitor working practices including implementation of soil handling methodologies. Paragraph B.4.3 of the Outline SRMP notes that a key purpose of the soil management methodologies is to ensure the original land quality is achieved on reinstatement. As set out by the respondent, the land is currently used by the respondent for agricultural purposes, including the horticultural development outlined. None of the restrictions set out in Schedule 5 to the Draft Development Consent Order [APP-023] will prohibit the respondent from continuing to use the land for this purpose once construction is complete. The Applicant confirms that the respondent may be entitled to claim compensation for crop loss and disturbance losses arising out of the temporary use of the land for construction of the project, in line with the Compensation Code.
RR-351-5	Land use and agriculture	5. Land Quality and Water Logging 5.1. The soils are Windsor, a seasonally wet deep clay. The soils are Slowly permeable seasonally waterlogged clayey soils mostly with brown subsoils and impeded drainage. The land is VERY WET and unworkable clay in the winter.	The Applicant confirms that seasonally wet, deep clayey soils have been identified in the Order Limits. All soils affected by construction works will be managed according to good practice principles as contained in the Outline Soil Resources Management Plan (SRMP), provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). The Outline SRMP includes protocols for determining appropriate soil handling conditions in relation to soil moisture state and rainfall criteria, which apply to soil movements as well as to trafficking across the land. The soils will be managed according to industry good practice to minimise damage caused to soils, including through compaction by machinery.
RR-351-6	Land use and agriculture	5.2. We have worked hard to manage our soils, at great cost, to improve this field. We fear that Southern Water will not adequately reinstate the land.	The Outline Soil Resources Management Plan (SRMP), provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), highlights the appointment of an Agricultural Liaison Officer

Reference	Theme	Issue raised	The Applicant's response
			(ALO) who will be the primary point of contact for landowners to raise concerns during construction. The roles of the ALO are set out in paragraph B.2.16 and include the undertaking of site inspections during construction to monitor working practices including implementation of soil handling methodologies. Paragraph B.4.3 of the Outline SRMP notes that a key purpose of the soil management methodologies is to ensure the original land quality is achieved on reinstatement. The Outline SRMP notes that any defects identified and agreed between the landowner, ALO and Contractor will be ameliorated by the Contractor.
RR-351-7	Land use and agriculture	5.3. We wouldn't take a tractor onto our land between November and March, as they will do damage to the soil structure.	Refer to response to RR-351-5.
RR-351-8	Land use and agriculture	5.4. We believe it will be impossible to work on the land for 4 to 5 months of the year, particularly when the topsoil has been stripped and the subsoils compacted with heavy machinery. There is insufficient information within the applicants submission as how they are going to deal with this issue. How they are going to stop soil erosion and water and sediment runoff to the local streams and ditches.	Refer to response to RR-351-5. Additionally, Outline Construction Environmental Management Plan (Outline CEMP) (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), [APP-413] and [APP-414] for documents 2 and 3 includes controls at provision WE5 to minimise sediment runoff and pollution risks. These include limiting the extent of open excavations, storing and capping topsoil stockpiles to reduce erosion, retaining strips of undisturbed vegetation, installing interceptor drains and sediment traps, routing drainage through site drainage systems, using settling tanks or filtration ponds before discharge, and reseeding disturbed areas where appropriate. These measures are intended to protect nearby watercourses and drainage features during construction. In addition, the Project includes an Outline Soil Resource Management Plan (Outline SRMP), contained within Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), which sets out the approach to soil handling, storage, reinstatement and monitoring to reduce soil compaction and protect soil resources during construction.
RR-351-9	Land use and agriculture	5.5. We request that an independent soils expert to prepare a detailed record of condition pre and post works, to have a quantifiable document of soil structure, nutrient levels and soil makeup.	The Outline Soil Resources Management Plan (SRMP), provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) , highlights the appointment of an Agricultural Liaison Officer (ALO) who will be the primary point of contact for landowners to raise concerns during construction. The roles of the ALO are set out in paragraph B.2.16 and include the undertaking and preparation of a Record of Condition capturing the condition of the land prior to commencement of construction activities. The Outline SRMP also provides for pre- and post-construction soil surveys and monitoring to inform reinstatement and verify that disturbed land has been appropriately reinstated following construction.
RR-351-10	Landowner engagement	6. Southern Waters Conduct to date 6.1. We have been disappointed in Southern Waters conduct to date. There	The Applicant does not recognise the accusations levelled at its approach to landowners

Reference	Theme	Issue raised	The Applicant's response
		communication has been poor. They have been unwilling to work with us to allow survey access, relying on statutory rights to take access.	The Applicant will continue to engage with the respondent in an attempt to secure a voluntary agreement. The Applicant most recently met on site with the respondent and their representative on the 10 November 2026 to discuss their feedback further. In relation to surveys, the use of statutory powers under Section 172 of the Housing and Planning Act 2016 has been referenced in correspondence to ensure the respondent is aware of the statutory powers available but confirms that these would only be relied upon by the Applicant following reasonable attempts to secure access by voluntary agreement. The Applicant therefore considers it has acted responsibly in making landowners aware of the statutory alternatives available should voluntary agreements not be reached.
RR-351-11	Landowner engagement	7. Need for Compulsory Purchase Powers 7.1. The Department for Communities and Local Government, Planning Act 2008, Guidance related to Procedures for the compulsory acquisition of land (CA Guidance), sets out the requirements Acquiring Authorities should meet to be granted CPO powers.	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent and in accordance with the Statement of Reasons [APP-025] and as set out in the Applicant's responses to RR-351-12, RR-351-13, RR-351-14 and RR-351-15, the Applicant considers that the relevant tests for compulsory acquisition have been met.
RR-351-12	Landowner engagement	7.2. Para 6. "provides that a development consent order may only authorise compulsory acquisition if the Secretary of State is satisfied that: - the land is required for the development to which the consent relates, or is required to facilitate, or is incidental to, the development".	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance.
RR-351-13	Landowner engagement	7.3. Para 8. "The applicant will also need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate"	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance.

Reference	Theme	Issue raised	The Applicant's response
			The Applicant has included the minimum amount of land necessary to deliver the authorised development within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the authorised development.
RR-351-14	Landowner engagement	7.4. Para 9. "The applicant must have a clear idea of how they intend to use the land which it is proposed to acquire.	Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance. The Applicant's proposed use of the land is set out in the Works Plans [APP-014] with detail of each Works Number set out in 'Schedule 1 – Authorised Development' to the Draft Development Consent Order [APP-023]. The respondent is affected by 'Works No.4 – Pipeline between the WRP site and Otterbourne WSW' and 'Work No.7 - Environmental Mitigation & Enhancement Areas' for which the Applicant is seeking the acquisition of rights and temporary possession powers as set out in Sheet 22 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2).
RR-351-15	Landowner engagement	7.5. Para 11. Section 122 of the Planning Act sets out two conditions which must be met to the satisfaction of the Secretary of State before compulsory acquisition can be authorised. The first of these is related to the purpose for which compulsory acquisition is sought. These three purposes are set out in section 122(2): (i) the land is required for the development to which the development consent relates. For this to be met, the applicant should be able to demonstrate to the satisfaction of the Secretary of State that the land in question is needed for the development for which consent is sought. The Secretary of State will need to be satisfied that the land to be acquired is no more than is reasonably required for the purposes of the development. (ii) the land is required to facilitate or is incidental to the proposed development. An example might be the acquisition of land for the purposes of landscaping the project. In such a case the Secretary of State will need to be satisfied that the development could only be landscaped to a satisfactory standard if the land in question were to be compulsorily acquired, and that the land to be taken is no more than is reasonably necessary for that purpose, and that is proportionate.	The Applicant is aware of the compulsory acquisition requirements outlined by the respondent. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance. The Applicant has included the minimum amount of land necessary to deliver the authorised development within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the authorised development.

Reference	Theme	Issue raised	The Applicant's response
RR-351-16	Location of the proposed pipeline routes	7.6. We believe that part the land included within the order limits is not necessary to facilitate the scheme and it volume of land taken is not proportionate.	The Applicant notes this comment and in accordance with the Statement of Reasons [APP-025] and as set out in the Applicant's responses to RR-351-12 to RR-351-15, the Applicant considers that the relevant tests for compulsory acquisition have been met. The Applicant has included the minimum amount of land necessary to deliver the authorised development within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the authorised development. As detailed within the Statement of Reasons [APP-025], temporary use possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the Project.
RR-351-17	Location of the proposed pipeline routes	7.7. On our property the order limits extending to 8.79 acres for 535 linear meters of pipe, which equates to an average of 66.5m in width, with a maximum width of around 80m.	Please refer to the Applicant's response to RR-351-18.
RR-351-18	Location of the proposed pipeline routes	7.8. The Acquiring Authority have not provided any justification for the scale/quantum of the Order Limits. They have stated (Para 3.3.3 Document Reference 4.1) that the maximum working width is 40m. Yet later (para 3.3.1 Document Reference 4.1- please note numbering error in document) the working width may be up to 50m.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. This is set out at section 3.5.92 of ES Chapter 3 Description of the Proposed Development (APP-082). When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m for a maximum length of 42m.
RR-351-19	Location of the proposed pipeline routes	7.9. We understand that Southern Water have chosen not to undertake detailed design and want an element of flexibility, this flexibility could be reduced to 20m in width. It is clear that the scale of the Order Limits is significantly more than is reasonably necessary or proportionate for a pipe that 0.8m in width.	The design of the Project as set out in the DCO application provides flexibility for refinement informed by further surveys and investigations at the detailed design stage. The detailed design will be developed following approval of the DCO application and the appointment of a Contractor. This approach ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.

Reference	Theme	Issue raised	The Applicant's response
RR-351-20	Location of the proposed pipeline routes	7.10. We believe the Order Limits should be significantly reduced to a maximum of 20m. If the Acquiring Authority require greater area for unnecessary offsite storage, they can rent commercially available space off site.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline Construction Environment Management Plan [APP-412, APP-413, APP-414]. This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. This is set out at section 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m for a maximum length of 42m. If part of the required construction storage were to be located off-site, this would significantly increase the duration of construction works and the number of construction vehicle movements on the highway network. Both of these factors would result in adverse impacts on the environment and local communities.
RR-351-21	Location of the proposed pipeline routes	7.11. There is nothing within their submission that provides a justification for this excessive width of the order Limits.	Please refer to the Applicant's responses to RR-351-18 and RR-351-20.
RR-351-22	Location of the proposed pipeline routes	8. Scale of the Working Area 8.1. The justification for the working width is lacking any reality, below is an exact Graphic 3-3 Para 3.5.92 document Reference 6.1.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, which is secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3)). This would provide the necessary space for a haul road, construction working areas, material storage areas, pipeline trench and soil storage areas. This is set out at section 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3)). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m, over a distance of a maximum of 42m. The haul road/working area must be a sufficient width to allow a suitably sized excavator to track back at 90 degrees to the pipe to lift it and then lower into the trench. A suitably sized excavator capable of carrying out a tandem lift of a string of pipes would circa 11m long hence the 11m required. The working area for the trench excavation is calculated using the width of the excavator capable of pipeline installation (circa 3.5m) and a 2m deviation of the pipeline route in each direction without compromising the pipelaying process. If the pipeline has to change direction the joints are designed to allow

Reference	Theme	Issue raised	The Applicant's response
			a slight angle deviation to alter the direction this is a gradual process and requires sufficient space to allow for it. Therefore, a total of 7.5m. The pipe storage/jointing area must be wide enough to allow the pipes to be welded together to form the strings before lowering into the trench. As there will be welders working on this while the excavator is operating a 1m safety exclusion zone has to be in place. The total of the pipe storage/jointing area is therefore a total of 3.5m The area required for topsoil storage is based on topsoil being 200mm thick, which equates to $8m^3$ for a 40m working width. With a side slope of 1:1 and maximum height of 1.8m an area of 7m has been allocated which includes for any bulking factor. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The area required for subsoil provides enough width in this area to segregate upper and lower subsoils, therefore there would be two separate mounds, which ensures the subsoil can be reinstated properly. A 1:1 side slope and a bulking factor has been incorporated which equates to 7m. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The above areas equate to a working width of 40m.
RR-351-23	Location of the proposed pipeline routes	8.2. This has a "Working Area and Haul Road" of 11m and a pipe trench 4m wide. This is excessive, yet only totals 15m in width. They want a further 25m for topsoil and subsoil storage.	See response to RR-351-22.
RR-351-24	Location of the proposed pipeline routes	8.3. I have undertaken a simple calculation of what may be needed as a working width - The Haul Road may be 3m wide, with occasional passing places, - Working area 8m, this allows 6m of digger working area, plus 2m pipe storage - Pipe width - this will be 1.5m plus say 1.5m each side of pipe = 4.5m - Topsoil Storage - A fair estimate is assume 150mm of top soil, across 20m equates to $3m^3$ of top soil, stacked at 1:2, say 2.5m x 1.25m = $3.75m^3$, therefore 2.5m for topsoil storage. - Sub-soil Storage - If the trench is 4 wide and assume a depth of 2m (2.15m below ground level) deep $7.5m^3$ of subsoil, again assume 1:2 stack equates to 4m of subsoil storage. - Excess 2m excess for fencing and other uses - Total working area required - 24m in width	See response to RR-351-22.
RR-351-25	Location of the proposed pipeline routes	8.4. It is completely unjustified, unreasonably, unnecessary for the purpose, and disproportionate to permit a working area greater than 24m in width for open cut sections of pipe	See response to RR-351-22.

Reference	Theme	Issue raised	The Applicant's response
RR-351-26	Landowner engagement	8.5. If Southern Water wish to used additional space this can be done by agreement at a market rent with individual landowners.	The Applicant has been seeking voluntary agreements for all land identified for temporary possession. Details of this engagement can be found within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1). As detailed within the Statement of Reasons [APP-025], temporary use possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the project. Whilst the Applicant's preference is to reach a voluntary agreement, it considers that the temporary possession powers sought within the DCO are necessary to ensure that the Project can be delivered where agreement cannot be reached. Reasonable losses incurred by landowners arising out of the temporary use of land will be reimbursed in line with the Compensation Code. The Applicant therefore considers that the temporary possession powers sought are justified and proportionate, whilst maintaining that a voluntary agreement remains its preferred outcome where possible.
RR-351-27	Location of the proposed pipeline routes	9. Scale of Easement Width 9.1. We haven't been provided any justification of the easement width restriction. Southern Water requested a 11m easement for open cut , with permanent restriction place on this land. Yet for tunnelled section the easement has been reduced to 2.5m each side of the pipe.	The purpose of the easement is to protect the integrity and operational requirements of the pipeline and to ensure appropriate access for inspection, maintenance, repair and replacement activities. The required width has been determined following a detailed technical assessment, taking account of the pipeline's diameter, depth, construction methodology, location and operational function. For sections of pipeline installed using open-cut construction, the Applicant is seeking an easement width of 11m (5.5m either side of the pipeline). This reflects the access and operational requirements associated with maintaining and, if necessary, excavating the pipeline in the future. Notably, this represents a reduction from the Applicant's published stand-off guidance for water mains of a comparable size and depth [1], which would typically require a wider protected corridor. This reduction from the normal requirement has been communicated to landowners and their agents where this is being challenged. For sections constructed using trenchless techniques, a reduced easement width is considered appropriate, taking into account depth, construction methodology and location. As the pipeline is installed at greater depth and future maintenance or operational access would be undertaken from either side of the trenchless section rather than directly above it, the same level of restriction is not required. The easement width has therefore been tailored to reflect the differing operational requirements of the construction methodologies.

Reference	Theme	Issue raised	The Applicant's response
			The Applicant is therefore satisfied that the easement widths proposed represent the minimum reasonably required to protect the pipeline and secure its safe operation over its lifetime.
RR-351-28	Location of the proposed pipeline routes	9.2. We have assessed other water providers easement width and the typical easement width for an 800mm pipe is 8m total width.	See response to RR-351-27. In accordance with the Statement of Reasons [APP-025] the Applicant considers that the relevant tests for compulsory acquisition have been met. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits, whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) sets out the maximum diameter of the pipelines for the different Project components, which may be greater than the 800mm referenced by the Respondent. The Applicant considers the permanent rights sought are justified in order to protect and preserve the integrity of the Project.
RR-351-29	Location of the proposed pipeline routes	9.3. We have requested justification for this easement width; this hasn't been supplied. We therefore believe this is unreasonable, unjustified and disproportionate and should be reduced.	See response to RR-351-27.
RR-351-30	Landowner engagement	10. Private Negotiations and Alternative to Compulsory Purchase 10.1. We understand that it is not for the planning Inspectorate to comment on the terms of any private negotiated agreements. We must comment that Southern Water have been impossible to work with. They have dictated terms, without given any consideration to amending the terms. The terms offered a significantly worse that those under compulsory acquisition.	The Applicant does not recognise the accusations levelled at its approach. The Applicant remains committed to working collaboratively with landowners and disagrees with respondent's suggestion that they have been unwilling to enter into any form of negotiations. The Applicant has made several amendments to the proposed Heads of Terms as confirmed by a relevant representation made by a member of the Land Agent Group [RR-233] and improved the commercial offer during the negotiations to demonstrate the Applicant's preference to enter into voluntary agreements with landowners. The Heads of Terms proposed by the Applicant closely align with those adopted across other utilities and infrastructure projects, which have also been reviewed and accepted by respective land agent groups. To date, despite formally requesting evidence demonstrating why the commercial offer is considered unreasonable on 28 January 2026, the Applicant is yet to receive a response.
RR-351-31	Landowner engagement	10.2. They are only playing lip-service and have no intention of reaching any form of settlement with Landowners and Occupiers. This is apparent from the Pre-application Land and Rights Negotiation Tracker.(Document 4.4) only 1 landowner has returned Heads of Terms out of 172 Category 1 Landowners. The one that has been return is a middle section of a drill section, so no above	Whilst the Applicant would prefer to be able to advise the Examining Authority of a higher return of signed Heads of Terms, it does not consider this to be because the terms offered to the respondent are unreasonable. As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document

Reference	Theme	Issue raised	The Applicant's response
		ground access is needed. 99.4% of landowners have not sign up to the heads of terms, clearly demonstrates that Southern Water have not made any significant effort to reach agreement with Landowners and Interested Partys and they are relying on taking land by compulsion.	reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken extensive and ongoing engagement with landowners with a view to secure voluntary agreement. The Applicant refutes the suggestion that it seeks to rely on statutory powers and confirms its preference to reach a voluntary agreement.
RR-351-32	Landowner engagement	10.3. Not a single Option Agreements have been entered into.	Whilst the Applicant would prefer to be able to advise the Examining Authority of a higher return of signed Heads of Terms and progress to Option Agreements, it does not consider this to be because the terms offered to landowners are unreasonable. To date, despite formally requesting evidence demonstrating why the commercial offer is considered unreasonable on 28 January 2026, the Applicant is yet to receive a response. The Heads of Terms proposed by the Applicant closely align with those adopted across other utilities and infrastructure projects, which have also been reviewed and accepted by respective land agent groups
RR-351-33	Landowner engagement	10.4. I believe it is disingenuous to categorize me as Head of Terms negotiation on-going (yellow status). This is not true, Southern Water have shown no interest in reaching an agreement with us. I request that my status is amended to Heads of Terms agreements unlikely before close of examination (red).	The Applicant considers the status recorded by the Applicant in the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1) is correct, given that Heads of Terms for a voluntary agreement have been issued and are being discussed with the respondent's representative. Following the Heads of Terms being issued on 6 March 2026, the Applicant discussed the Heads of Terms with the respondent's representative at a meeting on 13 May 2026. Following this, the Applicant requested a further meeting on 17 July 2026 and after issuing a proposal for revised terms on 7 August 2026 incorporating amended provisions and improved commercial terms, sought an additional meeting with the respondent's agent on 11 September 2026, evidencing the Applicant's attempts to reach a voluntary agreement. The Applicant will continue to engage with the respondent in an attempt to secure a voluntary agreement. The Applicant most recently met on site with the respondent and their representative on the 10 November 2026 to discuss their feedback further.
RR-351-34	Construction impacts and effects	10.5. How can we the landowner stop the contactors if the ground conditions become detrimental to work in.	The Applicant considers that there are adequate controls within the Outline Soil Resources Management Plan (Outline SRMP), provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), to ensure that the soils are only worked or traversed by machinery when in a suitable condition. The monitoring protocols include live, ongoing monitoring of the soil moisture state, as well as rainfall criteria. The Outline SRMP also highlights the appointment of an Agricultural Liaison Officer (ALO) who will be the primary point of contact for landowners to raise concerns during construction. The roles of the ALO are set out in paragraph B.2.16 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and include undertaking site inspections during

Reference	Theme	Issue raised	The Applicant's response
			construction to monitor working practices or the implementation of soil handling methodologies.
RR-351-35	Land use and agriculture	10.6. Our land is drainage with man-made drainage, both modern perforated PVC pipe and drainage store and more traditional clay drainage. If these drains are cut they will flood the entire field making the entire field unfarmable. We insist that pre-drainage works are undertake to drain the working corridor and that we can inspect all drains that are damaged before they are re-covered.	Measures WE4 and WE5 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) note that a Construction Drainage Plan will be prepared by the Contractor, which will be informed by baseline drainage surveys undertaken by a specialist drainage contractor, to locate drains and to ensure appropriate reinstatement. The Outline Soil Resources Management Plan (SRMP) provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) notes at paragraph B.2.16 that an Agricultural Liaison Officer will be appointed and will be responsible for a number of roles, including the coordination of drainage surveys and keeping landowners informed of pre- and post-construction drainage schemes. The ALO will be the primary point of contact for landowners to raise concerns during construction. When the Applicant issued Heads of Terms to the respondent on 7th April 2026, it was also requested that the respondent share any information and/or plans regarding field drains. The Applicant has not received anything from the respondent to date but welcomes this information.

Table 2-69 The Applicant's response to RR-356 from Welborne Land Limited

Reference	Theme	Issue raised	The Applicant's response
RR-356-1	Landowner engagement	Hampshire Water Transfer and Water Recycling Project DCO Property: Welborne (formerly pt land at Roche Court and pt land at Southwick (title number HP847890 and HP847889 - freehold) Registered Proprietor: Welborne Land Limited (Company Registration Number 10786908), whose registered office is located at 20 Jewry Street, Winchester, SO23 8RZ (WLL) - Interested Person Registration Number: F52AEF364 Master Developer: Buckland Development Limited (CRN 06030455) whose registered office is located at 20 Jewry Street, Winchester, Hampshire, SO23 8RZ (Interested Person Registration Number: F143242B2) (Buckland) When considering the plans please note the following key: Relevant plot numbers shown as blue highlight in Schedule below Relevant plot numbers shown as pink highlight Relevant plot numbers shown as yellow highlight Please note the land ownership in respect of the Land Plots below have been identified 'by eye' on review of the various plans and no HMLR SIM searches have been carried out to confirm the position. Therefore, there may be small areas where the boundaries between adjoining landowners are not entirely clear from the Land Plans (particularly for the smallest of Plots). As such there	The Applicant notes this comment.

Reference	Theme	Issue raised	The Applicant's response
		may be minor discrepancies (and HMLR SIM searches required to confirm the position).	
RR-356-2	Location of AGP	Table 1: Drawing reference (APP-010) 23008233_PLN_LAND_07 Land Plan number Sheet 11 of 30 Land plots 11-022 Impacts of DCO: now N1. The proposed DCO and Pumping Station F (to be located on this land plot) and its proximity to the proposed Albany neighbourhood of Welborne creates a multitude of impacts on Welborne now.	The Applicant notes this comment.
RR-356-3	Landowner engagement	N2. Creating risk and concern related to financing the delivery of Welborne, due to concerns regarding the eventual construction and operational impact of the DCO (see columns adjacent), with impacts on land value, promotion agreements, option agreements and disposal discussions which are ongoing throughout the site, and including immediately adjacent land to this Plot.	The Applicant confirms that plot 11-022 as shown on the Land Plans (Document reference 2.2, DCO Volume 2, Version 2) and referenced by the respondent, sits on the edge of the boundary included in the Outline Planning Permission for Welborne. Given that this plot is just under 33 square metres and taking into account the scale of the remaining land within the Welborne development, the Applicant does not consider that the acquisition of this small area will materially impact the available development land, the land value, promotion agreements, option agreements or disposal discussions. The Applicant is seeking to acquire plot 11-022 for the construction of Intermediate Pumping Station F (IPS-F) within Work No. 5A on the Works Plans [AS-008]. As shown in Appendix C of the Design Approach Document [APP-079] the indicative example of how the above-ground elements of the Project are presented illustrates that this plot is likely to be required for access to IPS-F. The Applicant does not agree that the Project would prevent the marketing or delivery of the Albany neighbourhood. As set out in the Draft Development Consent Order [APP-023], the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1) and the Statement of Reasons [APP-025], the rights sought are limited to those reasonably required for the construction, operation and maintenance of the Project and have been minimised where practicable. The Applicant has retained flexibility in the design of the Project, including potential access arrangements to IPS-F, to allow the detailed design of the Albany neighbourhood to come forward in due course. The Applicant does not consider that the Project would give rise to material constraints on the developability of the Albany neighbourhood. It remains the Applicant's firm preference to reach a voluntary agreement for the acquisition of land and rights where possible. As detailed within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4,

Reference	Theme	Issue raised	The Applicant's response
			Version 1), the Applicant has undertaken engagement with the respondent's land agent on Heads of Terms to acquire this land voluntarily. The Applicant remains willing to discuss voluntary agreements and is continuing to engage with the respondent's land agent regarding their feedback and comments on the Heads of Terms. The Applicant met with the respondent on 10 November 2026 where progress was made on the Heads of Terms.
RR-356-4	Project timescales and programme	N3. Work on Master planning, design and scoping reserved matters applications has had to be paused for the adjacent eastern areas of Welborne until impacts during construction and operation of the DCO can be assessed. This is compounded by the lack of finalised proposals within the DCO, which are all marked as illustrative or indicative for the DCO elements close to Welborne.	The Applicant notes this comment. The IPS-F site (Work No. 5A) and the pipeline (Work No. 4) will not directly impact areas proposed for residential development. The ES includes an assessment on the future residents of Welborne Garden Village (see RR-356-20). Although the Order Limits do include a small area of land within the Welborne Garden Village for a construction compound, there would be no permanent requirement for land within the allocation, except for the provision of permanent access through the development, the location of which is being discussed with the developers. The ES concludes that during operation, IPS-F (Work No. 5A) would not result in significant landscape and visual or noise and vibration effects on future residents of Welborne Garden Village. See RR-356-20 for further detail on the outcomes of the assessment. The Project would be constructed over approximately a five year period, however, a detailed construction programme has not been defined at this stage and will be developed by the Contractor once appointed. ES Chapter 3 Description of the Proposed Development [APP-082] sets out the indicative construction programme, which has informed the environmental impact assessment. The construction programme will be phased and will be determined by the Contractor once appointed. Further engagement with affected parties and landowners would be undertaken ahead of construction.
RR-356-5	Project timescales and programme	N4. This uncertainty and lack of ability to progress has influenced and impacted phasing discussions, as this area of Welborne will not be able to be progressed to delivery until the DCO impacts are known. These impacts are not likely to be able to be fully assessed until the DCO is completed, which based on the best case programme set out in the DCO documentation would be 2035.	Please refer to the Applicant's response to RR-356-4.
RR-356-6	Project timescales and programme	N5. This could lead to the delay of infrastructure being provided to service the wider Welborne scheme, which is required by certain trigger points which may not be met if this phase of development is consequently delayed by the DCO delivery. This will have an impact on the delivery of the Welborne, if these trigger points cannot be met. A critical example of this is the delivery of the access route to the Albany neighbourhood of Welborne, and then its subsequent link to the Welborne Sports Hub. This Sports Hub must be delivered prior to the occupation of the 3360th dwelling at Welborne, and there is a risk that this cannot be progressed whilst the DCO is being constructed	Please refer to the Applicant's response to RR-356-4.

Reference	Theme	Issue raised	The Applicant's response
		(see C1-C6). If this continues until the estimated 2035 completion date (or later), this uncertainty could lead to the inability to meet this trigger point for infrastructure delivery, thereby halting the delivery of Welborne.	
RR-356-7	Location of the proposed pipeline routes	N6. All of these elements pose limitations on progressing Welborne, including consideration of the future planning strategy related to the Albany Neighbourhood and associated infrastructure provision. As this neighbourhood forms part of a much wider consent and outline permission, these impacts and uncertainties then knock on to Welborne as a whole.	Please refer to the Applicant's response to RR-356-4.
RR-356-8	Landowner engagement	N7. Furthermore, the above risks and uncertainties also apply to the land outside of the Welborne boundary which would experience effects from these proposals, such as surrounding farmland. The uncertainties related to the DCO and proposals compound the ability to scope and plan for the future of these landholdings, in any context.	The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements will be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design. The Applicant is continuing to engage with the respondent's land agent regarding their feedback and has requested that the respondent shares any plans for the future of these landholdings so they can be discussed further. Where land is used temporarily for construction or the installation of the pipeline, land will be restored to its original condition in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and which will be developed further into a detailed SRMP prior to commencement of construction. The land will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. Where access is required in the future for routine maintenance or repair, the Applicant will give reasonable notice of the intention to carry out the works. This notice period will normally be at least 7 days, unless a shorter period is agreed or it is an emergency. The Applicant confirms that compensation will be paid for any reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-356-9	Landowner engagement	N8. Whereas the other land to be compulsorily acquired (plots 11-014, 11-015 and 11-019 - forming part of the Roche Court Estate) is located just outside of the boundary of the Outline Planning Permission for Welborne, the land in this plot falls within the boundary. (Graphic)	The Applicant confirms that plot 11-022 as shown on Sheet 11 and 12 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2) and referenced by the respondent, sits on the edge of the boundary included in the Outline Planning Permission for Welborne. Given that this plot is just under 33 square metres and taking into account the scale of the remaining land within the Welborne development, the Applicant does not consider that the acquisition of this small area will materially impact the available development land. The Applicant is seeking to acquire plot 11-022 for the construction of Intermediate Pumping Station F (IPS-F) within Work No. 5A on Sheet 11 and

Reference	Theme	Issue raised	The Applicant's response
			12 of the Works Plans [AS-008]. As shown in Appendix C of the Design Approach Document (APP-079) the indicative example of how the above-ground elements of the Project are presented illustrates that this plot is likely to be required for access to IPS-F. It remains the Applicant's firm preference to reach a voluntary agreement for the acquisition of land and rights where possible. As detailed within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with the respondent's land agent on Heads of Terms to acquire this land voluntarily. The Applicant remains willing to discuss voluntary agreements and is continuing to engage with the respondent's land agent regarding their feedback and comments on the Heads of Terms. The Applicant met with the respondent on 10 November 2026 where progress was made on the Heads of Terms.
RR-356-10	Landowner engagement	N9. The compulsory acquisition of this land would lead to the loss of land available within Welborne at this location, which would likely have been provided as amenity planting, landscaping or boundary treatment. This may have a subsequent impact on the amount of development land available at Welborne.	Please see the Applicant's response to RR-356-9.
RR-356-11	Project timescales and programme	Impacts of DCO: during construction C1. From the submitted DCO documents, it is forecast that in a best case there will be a 5 year construction programme starting in 2028, with total of 7 years until the whole DCO will be operational. In this context, the construction impacts on Welborne will be significant. Within the Framework Construction Traffic Management Plan (7.2, APP-415), the following construction access and compound arrangement is shown. (Graphic)	As set out in Environmental Statement (ES) Chapter 3 Description of the Proposed Development [APP-082], the Project would be constructed over an approximate five-year period. Following commissioning of the new infrastructure, which is part of the approximate five-year construction period, the Project would become operational. As illustrated in the indicative construction programme included in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), the construction and commissioning of the Pipeline between the WRP site and Otterbourne WSW and Above Ground Plant would be completed in under three years between Q4 Year 1 and Q2 Year 4. The Framework Construction Traffic Management Plan (CTMP) [APP-415] has been prepared in consultation with the local highway authorities and National Highways, and seeks to minimise disruption associated with construction traffic on local communities and businesses. This includes restrictions on HGV movements in the network peak hours. A Framework Construction Worker Travel Plan (appended to the Framework CTMP) [APP-415] has also been prepared and includes a commitment to reduce the proportion of construction workers travelling by car. The Framework CTMP [APP-415] also includes a requirement for the Contractor to engage with HCC and the developer of Welbourne Graden Village and give suitable consideration to the associated planned works on the A32 to minimise disruption for the public as much as reasonably practicable.

Reference	Theme	Issue raised	The Applicant's response
RR-356-12	Construction compound locations	C2. This access and compound incorporates this land plot (here being 11-022), and thus there will be significant impact on the plot itself during the construction period. There will also be impacts to adjacent land emanating from the works proposed. This Plot is located on the track (shown coloured yellow in the plan below) that runs from Albany business park (forming part of the Southwick Estate in separate but connected ownership) to Pook Lane to the south. WLL have carried out works to improve the track to allow for the access for private vehicles. Other than its requirement for an agricultural access, this track is also the designated emergency egress for properties on Pook Lane (which are located on Roche Court Estate Land in separate but connected ownership) to the west of the River Wallington. As part of the almost completed M27 Junction 10 works being delivered for, Welborne has severed the access from Pook Lane to the A32. As a result, these properties get cut off in times of flood and this route (shown in yellow below) is their only access in times of flood, which occurs 2 or 3 times a year. This access is a permissive right granted by the Roche Court Estate to these Pook Lane Residents, who are tenants of the Estate (and so it would not be evident on a review of LR title documents). More precise impacts are uncertain, which has the effect of increasing risk (see N1-N7 of this table) which will have impacts now, during construction and during operation of the DCO scheme. (Graphic)	Please see the Applicant's response to RR-356-11. Development of IPS-F (Work No. 5A) will not permanently obstruct the existing access tracks that join Albany Business Park to Pook Lane. The Framework Construction Traffic Management Plan [APP-415] and Traffic Management Strategy [APP-416] include measures to manage construction traffic and reduce disruption, where reasonably practicable. These measures include maintaining access to affected properties through temporary access arrangements where required, provision of an out-of-hours contact line, advance communication of traffic management measures through a Stakeholder and Customer Communications Plan, implementation of a signage strategy to direct traffic onto unaffected routes, and responsive traffic measurement measures to address incidents of unforeseen events.
RR-356-13	Land use and agriculture	C3. Any use of this land will cease for agricultural purposes during construction and operation of the scheme. A series of amenity impacts will be present during construction which will be experienced within this plot as well as emanating from the use of the plot for construction purposes. This could include dust, noise, vibration and visual impact on the plot itself, adjacent land and occupiers including those at Albany Business Centre and Albany Farm (which form part of the Southwick Estate in separate but connected ownership).	The Applicant acknowledges this comment. ES Chapter 12 Land use and agriculture [APP-091] considers the effects of temporary or permanent loss of agricultural land, temporary and permanent impacts on agricultural land use, and temporary disruption to land uses during construction. Permanent losses of agricultural land are assessed as permanent construction effects and are restricted to the footprint of the Above Ground Plan. The assessment also considers in-combination effects on amenity, taking into account the findings of ES Chapter 6 Air quality and odour Document reference 6.1, DCO Volume 6, Version 1), ES Chapter 13 Landscape and visual [APP-092], ES Chapter 15 Noise and vibration [APP-094] and ES Chapter 18 Traffic and transport [APP-097]. Albany Business Centre is identified as a commercial property receptor within the Study area and Albany Farm Care Home is assessed as a community land and facilities receptor. ES Chapter 12 Land use and agriculture [APP-091] identifies that businesses at Albany Business Centre could experience temporary impacts on access associated with road closures on Chalk Lane during construction. However, access to businesses would be maintained at all times. A Framework Construction Traffic Management Plan [APP-415] includes measures to manage construction traffic and reduce potential disruption to access. The assessment also concludes that access to Albany Farm Care Home would be maintained at all times, with no construction traffic passing in proximity to the care home.

Reference	Theme	Issue raised	The Applicant's response
			ES Chapter 12 Land use and agriculture [APP-091] concludes that operation of the Project would not result in any significant in-combination effects on amenity for residential, community or commercial receptors. The Applicant confirms that plot 11-022 as shown on the Land Plans (Document reference 2.2, DCO Volume 2, Version 2) and referenced by the respondent, sits on the edge of the boundary included in the Outline Planning Permission for Welborne. As the respondent is proposing to use this land as part of their development, the Applicant considers that the respondent's own project would impact the future use of this land for agricultural purposes. In addition, given that this plot is just under 33 square metres and taking into account the scale of the remaining land within the Welborne development, the Applicant does not consider that the acquisition of this small area will materially impact the available development land. The Applicant is seeking to acquire plot 11-022 for the construction of Intermediate Pumping Station F (IPS-F) within Work No. 5A on the Works Plans [AS-008]. As shown in Appendix C of the Design Approach Document [APP-079] the indicative example of how the above-ground elements of the Project are presented illustrates that this plot is likely to be required for access to IPS-F. It remains the Applicant's firm preference to reach a voluntary agreement for the acquisition of land and rights where possible. As detailed within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with the respondent's land agent on Heads of Terms to acquire this land voluntarily. The Applicant remains willing to discuss voluntary agreements and is continuing to engage with the respondent's land agent regarding their feedback and comments on the Heads of Terms. The Applicant met with the respondent on 10 November 2026 where progress was made on the Heads of Terms.
RR-356-14	Location of the proposed pipeline routes	C4. These amenity impacts also will have a critical impact on the delivery of Welborne, with phases of development in the Albany Neighbourhood all subject to construction impacts from the DCO, likely leading to programme delays within these phases and in planning these phases throughout the construction phase of the DCO. This in turn will have an impact on the sales, marketing and occupation of development parcels. Our concerns are that we cannot market the Albany Neighbourhood to a potential developer whilst the DCO works are in progress.	The Applicant notes this comment. The IPS-F site (Work No. 5A) and the pipeline (Work No. 4) will not directly impact areas proposed for residential development. The ES includes an assessment on the future residents of Welborne Garden Village (see RR-356-20), and concludes that once developed the IPS-F site would not result in significant effects on future residents. Although the Order Limits do include a small area of land within the Welborne Garden Village for a construction compound, there would be no permanent requirement for land within the allocation, except for the provision of permanent access through the development, the location of which is being discussed with the developers. The Applicant has provided flexibility in the construction access from Chalk Lane to the IPS-F site, as demonstrated by the area of Work No. 9A. The location of this construction access within Work No. 9A will be determined by the design of Welborne Garden Village, in consultation with the developers.

Reference	Theme	Issue raised	The Applicant's response
RR-356-15	Location of AGP	C5. Construction of the DCO scheme will also inhibit access to this plot and surrounding land, accessed currently by a track which passes through this plot and adjacent plots.	As shown in the IPS-F Design Principles Plan in Appendix A of the Design Principles Document [APP-076], this land is not subject to the main IPS-F footprint. This area of the IPS-F work area (Work No. 5A) is required for access works. The Applicant intends to work with the developers of Welborne Garden Village to identify a suitable access arrangement to IPS-F (Work No. 5A). This is why the Applicant has retained flexibility for an operational access from Chalk Lane (Work No. 9A) or Albany Business Park (Work No. 9B).
RR-356-16	EIA approach and methodology	C6. Any mitigation referenced within the DCO material related to the construction phase is shown as indicative at this stage and although some detail is provided it is not comprehensive enough, and therefore it is impossible to delineate the precise construction impact proposed. For example, Appendix 15.3 of the ES dealing with noise, notes the impact of generator, combined plant, HVAC unit, transformer and compressor and provides some description of what mitigation could be deployed. However, no consequent modelling of specific mitigation measures on a specific layout appears to have been undertaken. Furthermore, as the majority of the construction proposals themselves are also shown as indicative, the suitability of the mitigation is also unclear. This increases the uncertainty and thus likely impact on this land plot and its surroundings.	The Applicant notes the concern regarding the nature of mitigation measures detailed in the Application, and notes the example given of Environmental Statement (ES) Appendix 15.3 Operational Noise Assessment [APP-181]. Construction phase effects associated with the Project are set out in the ES, with mitigation measures detailed in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), which is secured through a requirement in the draft DCO [APP-023]. Operational phase effects associated with the Project are similarly set out in the ES, with mitigation measures detailed in the Operational Environmental Management Plan (OEMP) [APP-422] which is secured through a requirement in the draft DCO [APP-023]. The Applicant considers that construction and operational mitigation is presented at an appropriate level of detail for the application stage. Some mitigation details remain indicative because they are dependent on the completion of detailed design that will be developed following any grant of development consent. The Environmental Impact Assessment (EIA) has been undertaken in accordance with the methodology described in ES Chapter 5 EIA Approach and Methodology [APP-084], which explains the use of the Rochdale Envelope approach. This approach is commonly applied to nationally significant infrastructure projects and enables environmental effects to be assessed against defined design parameters and reasonable worst case assumptions where aspects of detailed design will be developed post consent. Detailed design of the Project will be submitted for approval in accordance with the corresponding requirement in Schedule 2 to the draft DCO [APP-023]. Information regarding the Project design, construction assumptions and assessment parameters is provided within ES Chapter 3 Description of the Proposed Development [APP-082] and ES Chapter 5 EIA Approach and Methodology [APP-084]. These documents describe the maximum design parameters, construction assumptions and embedded mitigation that form the basis of the EIA. The environmental topic chapters then assess the likely significant effects arising from those parameters and identify any additional mitigation measures required. ES Appendix 15.1 Construction noise and vibration assessment [APP-179] explains the reasonable worst-case assumptions that have been made in the assessment of potential construction

Reference	Theme	Issue raised	The Applicant's response
			noise impacts. Construction noise mitigation measures are identified in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) which would avoid significant effects, as shown in the assessment presented in ES Chapter 15 Noise and vibration (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3)secures that the final package of construction noise mitigation will be sufficient to avoid significant effects, to be identified in a Noise and Vibration Management Plan (NVMP) to be submitted to and approved by the relevant Local Planning Authority prior to commencement of construction. The detailed design of the proposed WRP and Above Ground Plant is not complete at this stage; hence, operational noise modelling has been undertaken based on reasonable worst-case assumptions as outlined in ES Appendix 15.3 Operational Noise Assessment [APP-181]. ES Chapter 15 Noise and vibration [APP-094] identifies mitigation measures that could be implemented to avoid significant effects based on these worst-case assumptions. The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) includes a Site Specific Design Principle for the Water Recycling Plant site and each Above Ground Plant site, stating that "*Detailed design will ensure that operational noise levels at noise sensitive receptors do not exceed the Lowest Observed Adverse Effect Level, as identified in ES Chapter 15 Noise and vibration.*" This provides the required certainty that the operational noise effects will be appropriately mitigated irrespective of the uncertainty at this stage in the development design. The Applicant therefore considers that sufficient information has been provided at the application stage to enable affected parties, including landowners and their advisers, to understand the likely significant environmental effects arising in the construction and operation phases, assessed as part of the Application, as well as the suitability of mitigation measures proposed to address environmental impacts and effects.
RR-356-17	Location of AGP	C7. As the plot sits directly within the Welborne Boundary, as shown at N8 adjacent, these points are compounded.	The Applicant notes this comment. Please refer to the Applicant's responses to RR-356-11 to RR-356-16.
RR-356-18	Location of AGP	Impacts of DCO: during operation O1. Critically, Pumping Station F will be located directly on the land which comprises this plot. This will have a direct impact on the plot and adjacent land during operation of the DCO Scheme.	The location for IPS-F has been selected due to the reduced environmental impact and the ability to integrate the site into the existing and future landscape. The Scheme Development Report [APP-073, APP-074, APP-075] explains the process that was undertaken to select the location of IPS-F. IPS-F has been sited to avoid Welborne Garden Village land identified for allotments/recreation and avoid overhead power lines. It was identified to benefit from existing access and natural screening from an adjacent copse of trees and was considered to be less visually prominent in this location.
RR-356-19	Land use and agriculture	O2. Any use of this land will cease for agricultural purposes during construction and operation of the scheme. A series of amenity impacts will be present during operation which will be experienced within this plot as well as	Please refer to the Applicant's response to RR-356-13.

Reference	Theme	Issue raised	The Applicant's response
		emanating from the use of the plot. This could include noise, vibration and visual impact on the plot itself, adjacent land and occupiers including those at Albany Business Centre and Albany Farm.	
RR-356-20	Location of the proposed pipeline routes	O3. These amenity impacts also will have a critical impact on the delivery of Welborne, with phases of development in the Albany Neighbourhood all subject to these operational impacts from the DCO. This could lead to the loss of development land which is sterilised by these impacts, or an increased mitigation burden to reduce impacts of the pumping station neighbouring the development. This in turn will have an impact on the sales, marketing and occupation of development parcels.	The IPS-F site (Work No. 5A) will not directly impact land proposed for residential development. Please refer to the Applicant's response to RR-356-4 and RR-356-14, which explain the interface and therefore why the Project would not delay the development of Welborne Garden Village. The ES provides an assessment of the effects of IPS-F (Work No. 5A) on future residents of Welborne Garden Village. ES Chapter 13 Landscape and visual [APP-092] assesses the operational impacts of the Project on future residents of the Welborne Garden Village development. This describes that views experienced by future residents on the northern edge of Phase 5 of the Welborne Garden Village development (closest to IPS-F) looking north would comprise houses and gardens and the landscape buffer along northern edge of the Welborne Garden Village development. While IPS-F would introduce development beyond the landscape buffer, it would be at a lower elevation compared to the Welborne Garden Village development and would only be partially glimpsed from the residential properties due to the structure being largely enclosed by established planting which would be well-integrated with the existing woodland to the south. The visual effect is assessed to be minor adverse and not significant.. ES Chapter 15 Noise and vibration [APP-094] also considers the operational impacts of the Project on Welborne Garden Village development. Represented by the Noise and Vibration Sensitive Receptor (NSVR) FR2, the Albany neighbourhood would be a minimum 22m from the boundary of IPS-F, assuming that residential development would be at the extreme edge of the Welborne Garden Village boundary. The assessment concludes that with mitigation identified in the Design Principles Document [APP-076], effects are expected to be minor adverse and not significant.
RR-356-21	Construction compound locations	O4. Operation of the DCO scheme will also inhibit access to this plot and surrounding land, accessed currently by a track which passes through this plot and adjacent plots. Please see the impact of the severing of this link at C2. We cannot see that any mitigation has been proposed in respect of this access.	As shown in the IPS-F Design Principles Plan in Appendix A of the Design Principles Document [APP-076], this land is not subject to the main IPS-F footprint. This area of the IPS-F work area (Work No. 5A) is required for access works. The Applicant intend to work with the developers of Welborne Garden Village to identify a suitable access arrangement to IPS-F (Work No. 5A). This is why the Applicant has retained flexibility for an operational access from Chalk Lane (Work No. 9A) or Albany Business Park (Work No. 9B).
RR-356-22	EIA approach and methodology	O5. Any mitigation referenced within the DCO material related to the operation phase is shown as indicative at this stage, and therefore it is impossible to delineate the precise construction impact proposed. Furthermore, as the majority of the construction proposals themselves are also shown as	The Applicant notes the concern regarding the nature of mitigation measures detailed in the Application. Construction phase effects associated with the Project are set out in the Environmental Statement (ES), with mitigation measures detailed in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for

Reference	Theme	Issue raised	The Applicant's response
		indicative, the suitability of the mitigation is also unclear. This increases the uncertainty and thus likely impact on this land plot and its surroundings.	document 1 of 3), which is secured by the relevant requirement in Schedule 2 to the draft DCO [APP-023]. Operation phase effects associated with the Project are similarly set out in the ES, with mitigation measures detailed in the Operational Environmental Management Plan [APP-422] which is secured in the relevant requirement of Schedule 2 to the draft DCO [APP-023]. The Applicant considers that construction and operational mitigation is presented at an appropriate level of detail for the application stage. Some mitigation details remain indicative because they are dependent on the completion of detailed design that will be developed following any grant of development consent. The Environmental Impact Assessment (EIA) has been undertaken in accordance with the methodology described in ES Chapter 5 EIA approach and methodology [APP-084], which explains the use of the Rochdale Envelope approach. This approach is commonly applied to nationally significant infrastructure projects and enables environmental effects to be assessed against defined design parameters and reasonable worst case assumptions where aspects of detailed design will be developed post consent. Detailed design of the Project will be submitted for approval in accordance with the corresponding requirement in Schedule 2 to the draft DCO [APP-023]. Information regarding the Project design, construction assumptions and assessment parameters is provided within ES Chapter 3 Description of the Proposed Development [APP-082] and ES Chapter 5 EIA approach and methodology [APP-084]. These documents describe the maximum design parameters, construction assumptions and embedded mitigation that form the basis of the EIA. The environmental topic chapters then assess the likely significant effects arising from those parameters and identify any additional mitigation measures required. The Applicant therefore considers that sufficient information has been provided at the application stage to enable affected parties, including landowners and their advisers, to understand the likely significant environmental effects arising in the construction and operation phases, assessed as part of the Application, as well as the suitability of mitigation measures proposed to address environmental impacts and effects.
RR-356-23	Design of AGP	O6. The DCO documents make reference to the need for a maintenance access to Pumping station F, which is shown indicatively requiring access from the Welborne development in Document 5.12 - Design Approach Document Pt2. No agreement or proposals for this access have been agreed with the landowner or with Welborne, nor has its impacts been adequately assessed related to Welborne.	It is currently anticipated that the construction of the Pipeline and of the Intermediate Pumping Station F (IPS-F) will be completed before works for the development start in that north-east area of the Welborne Garden Village development. Until this section of Welborne Garden Village comes forward, the proposed operational access to IPS-F would be via a new means of access from Chalk Lane to the IPS-F site, within work No. 9A. Alternatively the existing access via Albany Business Park would be used (Work No. 9B). The area of Work No. 9A provides flexibility for the final location of this permanent access road from Chalk Lane, dependent on how Welborne Garden Village comes forward.

Reference	Theme	Issue raised	The Applicant's response
			The Applicant will require ongoing operational access to IPS-F as follows: • Vans (light goods vehicles) approximately twice per week. • A 10m rigid design vehicle approximately once per year. Infrequent repair activities may require other vehicles to access the site. These activities include repairing or replacing plant. Other vehicles needing access include vehicles for the fire brigade as per national standards and building regulation requirements. Additional arrangements may be required for these activities potentially requiring vehicles other than the 10m rigid design vehicle. Legal easements, for example, could be used to help plan for these infrequent activities. It remains the Applicant's firm preference to reach a voluntary agreement for the acquisition of land and rights where possible. As detailed within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with the respondent's land agent on Heads of Terms to acquire this land voluntarily. The Applicant remains willing to discuss voluntary agreements and is continuing to engage with the respondent's land agent regarding their feedback and comments on the Heads of Terms. The Applicant met with the respondent on 10 November 2026 where progress was made on the Heads of Terms. ES Chapter 20 Cumulative and in-combination effects [APP-099] provides the assessment of cumulative effects between the Project and the WGV development. Assessment ID FBC PC001 presents the cumulative assessment in detail in ES Appendix 20.2 Cumulative effects assessment [APP-209] and concludes there would not be a residual significant cumulative effect.
RR-356-24	Location of the proposed pipeline routes	O7. The easements proposed will have an impact on the agricultural use or operation of this land, whilst also sterilising it from any potential development or change of use (subject to promotion and relevant permissions).	As shown in the IPS-F Design Principles Plan in Appendix A of the Design Principles Document [APP-076], this land is not subject to the main IPS-F footprint. This area of the IPS-F work area (Work No. 5A) is required for access works. The Applicant intend to work with the developers of Welborne Garden Village to identify a suitable access arrangement to IPS-F (Work No. 5A. This is why the Applicant has retained flexibility for an operational access from Chalk Lane (Work No. 9A) or Albany Business Park (Work No. 9B).
RR-356-25	Location of AGP	O8. As the plot sits directly within the Welborne Boundary, as shown at N8 adjacent, these points are compounded. Our concern is that once completed, there may be impacts and constraints that require layout changes to the proposed development site which could impact on development numbers. The biggest concern is access. The DCO makes no attempt to co-locate their access with our proposed access arrangement for the neighbourhood.	As shown in the IPS-F Design Principles Plan in Appendix A of the Design Principles Document [APP-076], this land is not subject to the main IPS-F footprint. This area of the IPS-F work area (Work No. 5A) is required for access works. The Applicant intends to work with the developers of Welborne Garden Village to identify a suitable access arrangement to IPS-F (Work No. 5A). This is why the Applicant has retained flexibility for an operational access from Chalk Lane (Work No. 9A) or Albany Business Park (Work No. 9B).

Reference	Theme	Issue raised	The Applicant's response
RR-356-26	Landowner engagement	Land plots 11-016 Impacts of DCO: now This plot may fall within adjoining ownership of Mark Edward Thistlethwayte and Rupert Thomas Newton Thistlethwayte as the owners of the Roche Court Estate. N10. This land is noted to be required temporarily in relation to "Work No4 - PIPELINE BETWEEN THE WRP SITE AND OTTERBOURNE WSW", although it exact function remains unclear as Document 5.12 - Design Approach Document Pt2 (APP-078) - shows the lands function as an access once the development is complete. This uncertainty furthers evidences the considerations as set out at N1-N7 above, each of which directly apply to this plot and its adjacent land.	As shown on the Land Plans (Document reference 2.2, DCO Volume 2, Version 2) and the Access and Public Rights of Way Plans [APP-016], plot 11-016 is required temporarily during construction for the diversion of a Public Right of Way (PRoW). Further detail regarding the proposed PRoW mitigation measures, such as temporary closures and diversions that are required as part of the Project can be found in the Framework Rights of Way Management Plan which is Appendix B to the Framework Construction Traffic Management Plan [APP-415].
RR-356-27	Location of the proposed pipeline routes	Land plots 11-016 Impacts of DCO: now N11. These considerations are compounded in the case of this plot as it sits directly within the Welborne boundary. (Graphic)	Plot 11-016 is shown as being required temporarily on sheets 11 and 12 of the Lands Plans 2 of 3 documents [APP-010]. Its purpose is to accommodate a temporary diversion of the Public Right of Way to the east of the IPS-F site (Work No. 5A) during the construction phase.
RR-356-28	Location of the proposed pipeline routes	Land plots 11-016 Impacts of DCO: during construction C8. All considerations C1 to C7 above apply to this plot (excluding C2). This plot also sits directly within the Welborne boundary, as shown in N11 adjacent. In particular, this Plot is also on the access referred to at C2.	Please see the Applicant's response to RR-356-11, RR-356-13 to RR-356-17. As shown on the Land Plans (Document reference 2.2, DCO Volume 2, Version 2) and the Access and Public Rights of Way Plans (APP-016), plot 11-016 is required temporarily during construction for the diversion of a Public Right of Way (PRoW). Further detail regarding the proposed PRoW mitigation measures, such as temporary closures and diversions that are required as part of the Project can be found in the Framework Rights of Way Management Plan which is Appendix B to the Framework Construction Traffic Management Plan (APP-415).
RR-356-29	Landowner engagement	Land plots 11-016 Impacts of DCO: during operation O9. Whilst this plot is not proposed to comprise permanent development according to the land plan, it does seem to have some operational function as set out at N8 of this table. This needs to be clarified.	As shown on the Land Plans (Document reference 2.2, DCO Volume 2, Version 2) and the Access and Public Rights of Way Plans [APP-016], plot 11-016 is required temporarily during construction for the diversion of a Public Right of Way (PRoW). Further detail regarding the proposed PRoW mitigation measures, such as temporary closures and diversions that are required as part of the Project can be found in the Framework Rights of Way Management Plan which is Appendix B to the Framework Construction Traffic Management Plan [APP-415]. The Applicant is not seeking permanent rights over this plot and there will be no ongoing requirements during operation of the Project.

Reference	Theme	Issue raised	The Applicant's response
RR-356-30	Location of the proposed pipeline routes	Land plots 11-016 Impacts of DCO: during operation O10. Notwithstanding the permanence of any development of the plot, its use would create restriction on the use or operation of the plot (as in O7 above) or its use for landscaping, tree planting or earthworks related to the Welborne site.	Plot 11-016 is shown as being required temporarily on sheets 11 and 12 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2). Its purpose is to accommodate a temporary diversion of the Public Right of Way to the east of the IPS-F site (Work No. 5A) during the construction phase.
RR-356-31	Location of the proposed pipeline routes	Land plots 11-016 Impacts of DCO: during operation O11. These considerations are compounded in the case of this plot as it sits directly within the Welborne boundary, as shown in N9 adjacent.	Plot 11-016 is shown as being required temporarily on sheets 11 and 12 of the Lands Plans 2 of 3 documents [APP-010]. Its purpose is to accommodate a temporary diversion of the Public Right of Way to the east of the IPS-F site (Work No. 5A) during the construction phase.
RR-356-32	Landowner engagement	Land plots 11-017 Impacts of DCO: now N12. Same considerations as the entire entry for land plot 11-016 above	Please see the Applicant's response to RR-356-26.
RR-356-33	Location of the proposed pipeline routes	Land plots 11-017 Impacts of DCO: during construction C9. Same considerations as the entire entry for 11-016 above. In particular, this plot is also on the access referred to at C2.	Please see the Applicant's response to RR-356-11 to RR-356-17.
RR-356-34	Location of the proposed pipeline routes	Land plots 11-017 Impacts of DCO: during operation O12. Same considerations as the entire entry for 11-016 above	The Applicant notes this comment. Please refer to the Applicant's responses for 11-016 above.
RR-356-35	Location of the proposed pipeline routes	Land plots 11-018 Impacts of DCO: now N13. Same considerations as set out in N1-N7, however in the case of this plot, this is fundamentally compounded by the fact that much of the plot encroaches directly on the Welborne site. (Graphic)	Plot 11-018 is shown as being required temporarily on sheets 11 and 12 of the Lands Plans 2 of 3 documents [APP-010]. As per the IPS-F Design Principles Plan (contained within Appendix A of the Design Principles Document [APP-076], this plot is required as a construction compound to facilitate construction of IPS-F. Following completion of the works, the construction compound would be removed and the land reinstated.
RR-356-36	Location of AGP	Land plots 11-018 Impacts of DCO: now N14. The DCO documentation seems to show this as land being required for Intermediate Pumping Station F however its temporary use intonates that it will be returned to its use post construction. This needs to be clarified as the position related to this land is not clear within the DCO documents.	Plot 11-018 is shown as being required temporarily on sheets 11 and 12 of the Lands Plans 2 of 3 documents [APP-010]. As per the IPS-F Design Principles Plan (contained within Appendix A of the Design Principles Document [APP-076], this plot is required as a construction compound to facilitate construction of IPS-F. Following completion of the works, the construction compound would be removed and the land reinstated.

Reference	Theme	Issue raised	The Applicant's response
RR-356-37	Location of AGP	Land plots 11-018 Impacts of DCO: during construction C10. All considerations C1 to C7 above apply to this plot (save that this plot does not form part of the access referred to at C2 above) These considerations are compounded in the case of this plot as it sits directly within the Welborne boundary, as shown in N11 adjacent.	Plot 11-018 is shown as being required temporarily on sheets 11 and 12 of the Lands Plans 2 of 3 documents [APP-010]. As per the IPS-F Design Principles Plan (contained within Appendix A of the Design Principles Document [APP-076], this plot is required as a construction compound to facilitate construction of IPS-F. Following completion of the works, the construction compound would be removed and the land reinstated.
RR-356-38	Location of the proposed pipeline routes	Land plots 11-018 Impacts of DCO: during operation O13. Notwithstanding the permanence of any development of the plot, its use would create restriction on the use or operation of the plot (as in O7 above) or its use for landscaping, tree planting or earthworks related to the Welborne site.	Please refer to the Applicant's response to RR-356-36.
RR-356-39	Location of AGP	Land plots 11-018 Impacts of DCO: during operation O14. These considerations are compounded in the case of this plot as it sits directly within the Welborne boundary, as shown in N11 adjacent.	Plot 11-018 is shown as being required temporarily on sheets 11 and 12 of the Lands Plans 2 of 3 documents [APP-010]. As per the IPS-F Design Principles Plan (contained within Appendix A of the Design Principles Document [APP-076], this plot is required as a construction compound to facilitate construction of IPS-F. Following completion of the works, the construction compound would be removed and the land reinstated.
RR-356-40	The draft DCO	Land plots 11-021 Impacts of DCO: now N15. Same considerations as set out in N1-N7. This land is located within the Welborne development (as shown in N11 above) and is to be subject to rights related to the DCO, further compounding the uncertainty generated.	Please see the Applicant's response to RR-356-2 to RR-356-8. Plot 11-021 is shown as being required for the acquisition of new rights and temporary use, on sheets 11 and 12 of the Lands Plans - 2 of 3 documents (Document reference 2.2, DCO Volume 2, Version 2). As set out in the Book of Reference (Document reference 5.11, DCO Volume 5, Version 1), the plot comprises access track and shrubbery. Given that this plot is just 57 square metres and taking into account the scale of the remaining land within the Welborne development, the Applicant does not consider that the acquisition of this small area will materially impact the available development land.
RR-356-41	Location of the proposed pipeline routes	Land plots 11-021 Impacts of DCO: during construction C11. All considerations C1 to C6 above apply to this plot. These considerations are compounded in the case of this plot as it sits directly within the Welborne boundary, as shown in N11 adjacent.	Please see the Applicant's response to RR-356-11 to RR-356-17.
RR-356-42	The draft DCO	Land plots 11-021 Impacts of DCO: during operation	Please see the Applicant's response to RR-356-40. This land is only required for an operational access to IPS-F (Work No. 5A) from Albany Business Centre (Work No. 9B), as shown on Sheet 12 of the Works Plans - 2 of 3 documents (Document reference 2.2, DCO Volume 2,

Reference	Theme	Issue raised	The Applicant's response
		O15. Notwithstanding the permanence of any development of the plot, its use would create restriction on the use or operation of the plot (as in O7 above) or its use for landscaping, tree planting or earthworks related to the Welborne site.	Version 2). As the design of this phase of Welborne Garden Village hasn't come forward yet, the Applicant has provided flexibility in the location of this access. In particular, access to IPS-F could alternatively be provided from Chalk Lane via Work No. 9A, in which case rights over Plot 11-021 may not ultimately be required.
RR-356-43	Location of AGP	Land plots 11-021 Impacts of DCO: during operation O16. These considerations are compounded in the case of this plot as it sits directly within the Welborne boundary, as shown in N11 adjacent.	The Applicant notes this comment. The permanent access for IPS-F will either be from Chalk Lane or via Albany Business Park. Plot 11-021 is situated where the Order Limits are drawn via Albany Business Park, there is flexibility at this location to enable the final location to be determined at the detailed design stage.
RR-356-44	Location of the proposed pipeline routes	Land plots 11-024 Impacts of DCO: now N16. Same impacts as N1 - N7 above.	This land is only required for an operational access to IPS-F (Work No. 5A) from Chalk Lane (Work No. 9A). As the design of this phase of Welborne Garden Village hasn't come forward yet, the Applicant has provided flexibility in the location of this access, as shown by the extent of Work No. 9A on Sheet 12 of the Works Plans – 2 of 3 documents [AS-008].
RR-356-45	Location of the proposed pipeline routes	Land plots 11-024 Impacts of DCO: now N16. Same impacts as N1 - N7 above. N17. These uncertainties are further relevant when specifically applied to this land plot as it lies directly in the open space area proposed at Welborne. (Graphic)	The Applicant notes this comment. The permanent access for IPS-F will either be from Chalk Lane or via Albany Business Park. Plot 11-024 is situated where the Order Limits are drawn around Chalk Lane, there is flexibility at this location to enable the final location to be determined at the detailed design stage.
RR-356-46	Location of the proposed pipeline routes	Land plots 11-024 Impacts of DCO: now N16. Same impacts as N1 - N7 above. N18. This plot is forms part of the area which is subject to works to underground the 132kv overground cables which pass across the plot, as approved by planning application P/23/1004/FP. These works have commenced and are subject to a multi-million pound investment package from Buckland to deliver.	As set out in response to RR-356-44, land plot 11-024 is only required for operational access to IPS-F (Work No. 5A) from Chalk Lane (Work No. 9A). As noted in response to RR-356-45, there is flexibility at this location to enable the final location of the permanent access required for IPS-F to be determined at detailed design stage, to ensure the cabling infrastructure required for P/23/1004/FP and the Project can both be delivered.
RR-356-47	Location of the proposed pipeline routes	Land plots 11-024 Impacts of DCO: during construction C12. All impacts C1 to C6 above apply to this plot. These considerations are compounded in the case of this plot as it sits directly within the Welborne boundary, as shown in N17 adjacent, and is subject to infrastructure works, as noted in N18.	This land is only required for an operational access to IPS-F (Work No. 5A) from Chalk Lane (Work No. 9A). As the design of this phase of Welborne Garden Village hasn't come forward yet, the Applicant has provided flexibility in the location of this access, as shown by the extent of Work No. 9A on Sheet 12 of the Works Plans – 2 of 3 documents [AS-008].

Reference	Theme	Issue raised	The Applicant's response
RR-356-48	Construction impacts and effects	Land plots 11-024 Impacts of DCO: during construction C13. Furthermore, the construction of the DCO Scheme will have a direct impact on utilities and access arrangements related to this plot during the construction period as we expect disruption from being able to lay new utilities to serve the develop or begin the construction of the proposed new access.	Due consideration has been given to the potential impacts of the Project on existing utility services and the need for diversion works. Known required diversions are being progressed directly with the relevant statutory undertakers and will be undertaken using the statutory undertakers' own powers, with associated works captured within the cumulative assessment in ES Chapter 20 Cumulative and in-combination effects [APP-099]. The Applicant has identified the statutory utilities and other organisations whose assets may be affected by the Project and is continuing to engage with those organisations as appropriate as the Project progresses to manage interfaces with their apparatus and interests. Protective provisions as set out within the Draft DCO [APP-023] will ensure that any assets are adequately appropriately protected during the construction of the Project.
RR-356-49	Landowner engagement	Land plots 11-024 Impacts of DCO: during operation O17. Notwithstanding the permanence of any development of the plot, its use would create restriction on the use or operation of the plot (as in O7 above) or its use for landscaping, tree planting or earthworks related to the Welborne site. Also of concern is the broad width of the blue area where the grant of rights are proposed, where they may seek unspecified rights over the land, this has the potential to hamper our proposed access and future planned utility provision as well as proposed land uses. Without clarity on what rights they seek in which location, we cannot determine the potential impact. This area overlays proposed allotments.	The Applicant confirms that plot 11-024 over which compulsory acquisition powers are sought for rights and the creation of new rights (including imposing restrictive covenants) is shown edged black and shaded blue on the Land Plans (Document reference 2.2, DCO Volume 2, Version 2). Plot 11-024 is required as part of Work No. 9A as shown on the Works Plans [AS-008] for the implementation of access works to IPS-F (Work No. 5A) including temporary construction access and improvement and the use of access from Chalk Lane to IPS-F for the purposes of operation and maintenance. There is flexibility in the Order Limits to allow for the final location of this permanent access road from Chalk Lane to be determined at the detailed design stage post consent. This flexibility is required due to uncertainty around detailed design associated with the Welborne Garden Village development and to allow for ongoing engagement with the respondent. The Applicant is continuing to engage with the developers of Welborne Garden Village to discuss potential interfaces with utilities and infrastructure. Further information was recently sent to the developer's project manager on 18 September 2026 to progress discussions regarding the infrastructure and utilities network being constructed. In addition, it remains the Applicant's firm preference to reach a voluntary agreement for the acquisition of land and rights where possible. As detailed within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with the respondent's land agent on Heads of Terms to acquire this land voluntarily. The Applicant remains willing to discuss voluntary agreements and is continuing to engage with the respondent's land agent regarding their feedback and comments on the Heads of Terms. The Applicant met with the respondent on 10 November 2026 where progress was made on the Heads of Terms.

Reference	Theme	Issue raised	The Applicant's response
RR-356-50	Location of the proposed pipeline routes	Land plots 11-024 Impacts of DCO: during operation O18. These considerations are compounded in the case of this plot as it sits directly within the Welborne boundary, as shown in N17 adjacent.	The Applicant notes this comment. The permanent access for IPS-F will either be from Chalk Lane or via Albany Business Park. Plot 11-024 is situated where the Order Limits are drawn around Chalk Lane, there is flexibility at this location to enable the final location to be determined at the detailed design stage.
RR-356-51	Landowner engagement	Land plots 11-024 Impacts of DCO: during operation O19. Furthermore, the DCO Scheme may have a direct impact on utilities and access arrangements related to this plot. From the information reviewed, there is a lack of clarity on any restrictions over the land associated with the rights to be acquired. As part of the WGV, we will require access over part of this parcel and will need to dedicate part as Highway, we will also need to retain rights to lay utilities and provide easement Agreements with utility companies. It is unclear to what extent this will be possible.	The Applicant confirms that plot 11-024 over which compulsory acquisition powers are sought for rights and the creation of new rights (including imposing restrictive covenants) is shown edged black and shaded blue on the Land Plans (Document reference 2.2, DCO Volume 2, Version 2). Plot 11-024 is required as part of Work No. 9A as shown on the Works Plans [AS-008] for the implementation of access works to IPS-F (Work No. 5A) including temporary construction access and improvement and the use of access from Chalk Lane to IPS-F for the purposes of operation and maintenance. There is flexibility in the Order Limits to allow for the final location of this permanent access road from Chalk Lane to be determined at the detailed design stage post consent. This flexibility is required due to uncertainty around detailed design associated with the Welborne Garden Village development and to allow for ongoing engagement with the respondent. The Applicant is continuing to engage with the developers of Welborne Garden Village to discuss potential interfaces with utilities and infrastructure. Further information was recently sent to the developer's project manager on 18 September 2026 to progress discussions regarding the infrastructure and utilities network being constructed. In addition, it remains the Applicant's firm preference to reach a voluntary agreement for the acquisition of land and rights where possible. As detailed within the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1) , the Applicant has undertaken engagement with the respondent's land agent on Heads of Terms to acquire this land voluntarily. The Applicant remains willing to discuss voluntary agreements and is continuing to engage with the respondent's land agent regarding their feedback and comments on the Heads of Terms. The Applicant met with the respondent on 10 November 2026 where progress was made on the Heads of Terms.
RR-356-52	Location of the proposed pipeline routes	Drawing reference (APP-010) 23008223_PLN_LAN D_12 Land Plan number Sheet 12 of 30 Land plots 11-016 Impacts of DCO: now Duplication from above (plot also shown on sheet 11)	The Applicant notes this comment. Please refer to the Applicant's responses provided above.

Reference	Theme	Issue raised	The Applicant's response
RR-356-53	Location of the proposed pipeline routes	Land plots 11-017 Impacts of DCO: now Duplication from above	
RR-356-54	Location of the proposed pipeline routes	Land plots 11-018 Impacts of DCO: now Duplication from above	
RR-356-55	Location of the proposed pipeline routes	Land plots 11-021 Impacts of DCO: now Duplication from above	
RR-356-56	Location of the proposed pipeline routes	Land plots 11-022 Impacts of DCO: now Duplication from above	
RR-356-57	Location of the proposed pipeline routes	Land plots 11-024 Impacts of DCO: now Duplication from above	
RR-356-58	Location of the proposed pipeline routes	Land plots 12-001 Impacts of DCO: now Same entry as 11-018 above	
RR-356-59	Location of the proposed pipeline routes	Land plots 12-001 Impacts of DCO: during construction Same entry as 11-018 above	
RR-356-60	Location of the proposed pipeline routes	Land plots 12-001 Impacts of DCO: during operation Same entry as 11-018 above	
RR-356-61	Location of the proposed pipeline routes	Land plots 12-002 Impacts of DCO: now N19. This plot comprises the access which spans directly through the Albany Business Centre and Albany Farm. This is assumed to be a maintenance access (as it is not shown as construction access as per C1 above). As such,	As per ES Chapter 3 Description of the Proposed Development [APP-082], construction vehicles would use Chalk Lane and not pass through Albany Farm.

Reference	Theme	Issue raised	The Applicant's response
		the same as detailed at N1 to N7 apply to this plot, further compounded by the plot's location within the Welborne boundary and within the open space network proposed (as per N18).	The permanent access for IPS-F will either be from Chalk Lane or via Albany Business Park. Plot 12-002 is situated where the Order Limits are drawn to provide access via Albany Business Park.
RR-356-62	Location of the proposed pipeline routes	Land plots 12-002 Impacts of DCO: during construction C14. All considerations C1 to C6 above apply to this plot. These considerations are compounded in the case of this plot as it sits directly within the Welborne boundary, as shown in N18 adjacent.	This land comprises an existing access track that would be used to access IPS-F (Work No. 5A) during the operational phase of the Project, dependent on how Welborne Garden Village progresses. This is why the Applicant has proposed Work No. 9A which would be used for an operational access from Chalk Lane and Work No. 9B for an operational access from Albany Business Park. No infrastructure or environmental works are proposed on this land. The Applicant only proposes the use of this existing access, and improvement of it if required.
RR-356-63	Land use and agriculture	Land plots 12-002 Impacts of DCO: during construction C15. Any use or construction related to this plot will have further direct impact on the use of Albany Business Centre and Albany Farm.	The Applicant acknowledges this concern regarding the potential effects of construction activities on Albany Farm Business Centre and associated estate operations. Albany Farm Business Centre has been identified as a cluster of businesses within the study area and has been assessed within ES Chapter 12 Land use and agriculture [APP-091]. The assessment considers potential effects on businesses arising from temporary changes to access, construction activities and changes to the operating environment. ES Chapter 12 Land use and agriculture [APP-091] identifies that businesses at Albany Farm Business Centre could experience temporary impacts associated with construction activities and temporary road closures on Chalk Lane. However, access to businesses would be maintained throughout construction. The Framework Construction Traffic Management Plan [APP-415] and Traffic Management Strategy [APP-416] include measures to manage construction traffic and reduce disruption, where reasonably practicable. These measures include maintaining access to affected properties through temporary access arrangements where required, provision of an out-of-hours contact line, advance communication of traffic management measures through a Stakeholder and Customer Communications Plan, implementation of a signage strategy to direct traffic onto unaffected routes, and responsive traffic measurement measures to address incidents of unforeseen events. In addition, traffic management on Chalk Lane would comprise a temporary lane closure with a 'GIVE/TAKE' system rather than a full road closure, helping to maintain access and traffic flow during the works. The Applicant has undertaken engagement with landowners and occupiers to understand the nature of landholdings, businesses and estate operations and will continue engagement throughout the construction period where required. The assessment presented in ES Chapter 12 Land use and agriculture [APP -

Reference	Theme	Issue raised	The Applicant's response
			091] concludes that the effect on businesses at Albany Farm Business Centre would be minor adverse and not significant in EIA terms.
RR-356-64	Construction impacts and effects	Land plots 12-002 Impacts of DCO: during construction C16. Furthermore, the construction of the DCO Scheme will have a direct impact on utilities and access arrangements related to this plot during the construction period.	Please refer to the Applicant's response to RR-356-48.
RR-356-65	Location of the proposed pipeline routes	Land plots 12-002 Impacts of DCO: during operation O20. Notwithstanding the permanence of any development of the plot, its use would create restriction on the use or operation of the plot (as in O7 above) or its use for landscaping, tree planting or earthworks related to the Welborne site. This plot includes land that is included to be the proposed permanent access to the Albany Neighbourhood and will mean amendments to masterplans to accommodate it with resulting impacts.	This land comprises an existing access track that would be used to access IPS-F (Work No. 5A) during the operational phase of the Project, dependent on how Welborne Garden Village progresses. This is why the Applicant has proposed Work No. 9A which would be used for an operational access from Chalk Lane and Work No. 9B for an operational access from Albany Business Park. No infrastructure or environmental works are proposed on this land. The Applicant only proposes the use of this existing access, and improvement of it if required.
RR-356-66	Location of the proposed pipeline routes	Land plots 12-002 Impacts of DCO: during operation O21. These considerations are compounded in the case of this plot as it sits directly within the Welborne boundary, as shown in N18 adjacent.	This land comprises an existing access track that would be used to access IPS-F (Work No. 5A) during the operational phase of the Project, dependent on how Welborne Garden Village progresses. This is why the Applicant has proposed Work No. 9A which would be used for an operational access from Chalk Lane and Work No. 9B for an operational access from Albany Business Park. No infrastructure or environmental works are proposed on this land. The Applicant only proposes the use of this existing access, and improvement of it if required.
RR-356-67	Location of the proposed pipeline routes	Land plots 12-002 Impacts of DCO: during operation O22. Any use or construction related to this plot will have further direct impact on the use of Albany Business Centre and Albany Farm and how easily changes to the proposed access route can be incorporated into the layout of a housing development.	The Applicant notes this comment and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. The Project has been designed to maintain access to Albany Business Centre throughout construction and operation. A key mitigation measure is that construction access to IPS-F and the associated construction compounds would utilise a separate temporary construction access from Chalk Lane, rather than routing construction traffic through Albany Business Centre. In addition, the Framework Construction Traffic Management Plan (CTMP) (APP-415) and Traffic Management Strategy (TMS) (APP-416) include measures to minimise disruption, including managed traffic controls (section 6 of the CTMP), a sequential approach to road closures where practicable (TMS - referenced throughout), traffic marshals at temporary access points (paragraph 6.3.2 of the CTMP), appropriate visibility splays (section 5.1 of the CTMP), advance signing (section 5.9 of the CTMP), and temporary traffic management arrangements designed in accordance with relevant guidance (section 2.3 of the TMS). Accordingly, whilst temporary traffic impacts on Chalk

Reference	Theme	Issue raised	The Applicant's response
			Lane may occur during construction, ES Chapter 18 Traffic and transport (APP-097) concludes that access to Albany Business Centre would be maintained and that residual effects would be minor adverse and not significant. The Applicant has also made a specific commitment relating to maintaining access for landowners where reasonably practicable, which will be secured through the DCO and associated management plans. This measure is outlined in the Commitments Register (ES Appendix 5.5) (APP-108) reference Mit-GT 248. The Applicant remains willing to discuss voluntary agreements and is continuing to engage with the respondent's land agent regarding their feedback and comments on the Heads of Terms. The Applicant met with the respondent on 10 November 2026 where progress was made on the Heads of Terms.
RR-356-68	Construction impacts and effects	Land plots 12-002 Impacts of DCO: during operation O23. Furthermore, the DCO Scheme will have a direct impact on utilities and access arrangements related to this plot.	Please refer to the Applicant's response to RR-356-48.
RR-356-69	Location of the proposed pipeline routes	Land plots 12-003 Impacts of DCO now: Same entry as 12-002 above	This land comprises an existing access track that would be used to access IPS-F (Work No. 5A) during the operational phase of the Project, dependent on how Welborne Garden Village progresses. This is why the Applicant has proposed Work No. 9A which would be used for an operational access from Chalk Lane and Work No. 9B for an operational access from Albany Business Park. No infrastructure or environmental works are proposed on this land. The Applicant only proposes the use of this existing access, and improvement of it if required.
RR-356-70	Location of the proposed pipeline routes	Land plots 12-003 Impacts of DCO: during construction Same entry as 12-002 above	This land comprises an existing access track that would be used to access IPS-F (Work No. 5A) during the operational phase of the Project, dependent on how Welborne Garden Village progresses. This is why the Applicant has proposed Work No. 9A which would be used for an operational access from Chalk Lane and Work No. 9B for an operational access from Albany Business Park. No infrastructure or environmental works are proposed on this land. The Applicant only proposes the use of this existing access, and improvement of it if required.
RR-356-71	Location of the proposed pipeline routes	Land plots 12-003 Impacts of DCO: during operation Same entry as 12-002 above	This land comprises an existing access track that would be used to access IPS-F (Work No. 5A) during the operational phase of the Project, dependent on how Welborne Garden Village progresses. This is why the Applicant has proposed Work No. 9A which would be used for an operational access from Chalk Lane and Work No. 9B for an operational access from Albany Business Park. No infrastructure or environmental works are proposed on this land. The

Reference	Theme	Issue raised	The Applicant's response
			Applicant only proposes the use of this existing access, and improvement of it if required.
RR-356-72	Location of the proposed pipeline routes	Land plots 12-005, Impacts of DCO now: Same entry as plot 11-024 above	This land is only required for an operational access to IPS-F (Work No. 5A) from Chalk Lane (Work No. 9A). As the design of this phase of Welborne Garden Village hasn't come forward yet, the Applicant has provided flexibility in the location of this access, as shown by the extent of Work No. 9A on Sheet 12 of the Works Plans – 2 of 3 documents [AS-008].
RR-356-73	Location of the proposed pipeline routes	Land plots 12-005 Impacts of DCO: during construction Same entry as 11-024 above	This land is only required for an operational access to IPS-F (Work No. 5A) from Chalk Lane (Work No. 9A). As the design of this phase of Welborne Garden Village hasn't come forward yet, the Applicant has provided flexibility in the location of this access, as shown by the extent of Work No. 9A on Sheet 12 of the Works Plans – 2 of 3 documents [AS-008].
RR-356-74	Location of the proposed pipeline routes	Land plots 12-005 Impacts of DCO: during construction Same entry as 11-024 above	This land is only required for an operational access to IPS-F (Work No. 5A) from Chalk Lane (Work No. 9A). As the design of this phase of Welborne Garden Village hasn't come forward yet, the Applicant has provided flexibility in the location of this access, as shown by the extent of Work No. 9A on Sheet 12 of the Works Plans – 2 of 3 documents [AS-008].
RR-356-75	Location of the proposed pipeline routes	Land plots 12-006 Impacts of DCO now: Same entry as plot 11-024 above	This land is only required for an operational access to IPS-F (Work No. 5A) from Chalk Lane (Work No. 9A). As the design of this phase of Welborne Garden Village hasn't come forward yet, the Applicant has provided flexibility in the location of this access, as shown by the extent of Work No. 9A on Sheet 12 of the Works Plans – 2 of 3 documents [AS-008].
RR-356-76	Location of the proposed pipeline routes	Land plots 12-006 Impacts of DCO: during construction Same entry as 11-024 above	This land is only required for an operational access to IPS-F (Work No. 5A) from Chalk Lane (Work No. 9A). As the design of this phase of Welborne Garden Village hasn't come forward yet, the Applicant has provided flexibility in the location of this access, as shown by the extent of Work No. 9A on Sheet 12 of the Works Plans – 2 of 3 documents [AS-008].
RR-356-77	Location of the proposed pipeline routes	Land plots 12-006 Impacts of DCO: during operation Same entry as 11-024 above	This land is only required for an operational access to IPS-F (Work No. 5A) from Chalk Lane (Work No. 9A). As the design of this phase of Welborne Garden Village hasn't come forward yet, the Applicant has provided flexibility in the location of this access, as shown by the extent of Work No. 9A on Sheet 12 of the Works Plans – 2 of 3 documents [AS-008].
RR-356-78	Location of the proposed pipeline routes	Drawing reference (APP-010) 23008223_PLN_LAND_12 Land Plan number Sheet 12 of 30 Land plots: 12-009 (subsoil) Impacts of DCO now: Same entry as plot 11-024 above	This land is only required for an operational access to IPS-F (Work No. 5A) from Chalk Lane (Work No. 9A). As the design of this phase of Welborne Garden Village hasn't come forward yet, the Applicant has provided flexibility in the location of this access, as shown by the extent of Work No. 9A on Sheet 12 of the Works Plans – 2 of 3 documents [AS-008].

Reference	Theme	Issue raised	The Applicant's response
RR-356-79	Location of the proposed pipeline routes	Land plots: 12-009 (subsoil) Impacts of DCO: during construction Same entry as 11-024 above	This land is only required for an operational access to IPS-F (Work No. 5A) from Chalk Lane (Work No. 9A). As the design of this phase of Welborne Garden Village hasn't come forward yet, the Applicant has provided flexibility in the location of this access, as shown by the extent of Work No. 9A on Sheet 12 of the Works Plans – 2 of 3 documents [AS-008].
RR-356-80	Location of the proposed pipeline routes	Land plots: 12-009 (subsoil) Impacts of DCO: during construction Same entry as 11-024 above	This land is only required for an operational access to IPS-F (Work No. 5A) from Chalk Lane (Work No. 9A). As the design of this phase of Welborne Garden Village hasn't come forward yet, the Applicant has provided flexibility in the location of this access, as shown by the extent of Work No. 9A on Sheet 12 of the Works Plans – 2 of 3 documents [AS-008].
RR-356-81	Location of AGP	TABLE 2 Plots where WLL is a Category 2 Person Drawing reference (APP-010) 23008233_PLN_LAND_07 (APP-010) Land Plan number Sheets 11 and 12 of 30 Land plots 11014 11015 and 11019 Impacts of DCO: now N1. The proposed DCO and Pumping Station F (to be located on this land plot) and its proximity to the proposed Albany neighbourhood of Welborne creates a multitude of impacts on Welborne now.	The Applicant notes this comment. Please refer to the Applicant's responses to RR-356-4 and RR-356-20.
RR-356-82	Landowner engagement	Land plots 11014 11015 and 11019 Impacts of DCO: now N2. Creating risk and concern related to financing the delivery of Welborne, due to concerns regarding the eventual construction and operational impact of the DCO (see columns adjacent), with impacts on land value, promotion agreements, option agreements and disposal discussions which are ongoing throughout the site, and including immediately adjacent land to this Plot.	The ES concludes that during operation, IPS-F (Work No. 5A) would not result in significant landscape and visual or noise and vibration effects on future residents of Welborne Garden Village. See RR-356-20 for further detail on the outcomes of the assessment. The Project would be constructed over approximately a five-year period. A detailed construction programme has not been defined at this stage and will be developed by the Contractor once appointed. However, ES Chapter 3 Description of the Proposed Development [APP-082] sets out the indicative construction programme for the Project. The construction programme will be phased and will be determined by the Contractor once appointed. Further engagement with the respondent will be undertaken ahead of construction, including a review of the phasing of the programme and the impacts on the Welborne Garden Village delivery. The Applicant aims to work collaboratively with landowners to address concerns and agree practical solutions wherever practicable. The construction programme will be phased and will be determined by the Contractor once appointed. Further engagement with the respondent will be undertaken ahead of construction, including a review of the phasing of the programme and the impacts on the Welborne Garden Village delivery. The Applicant aims to work collaboratively with landowners to address concerns and agree practical solutions wherever practicable.

Reference	Theme	Issue raised	The Applicant's response
			The Applicant is continuing to engage with the respondent regarding the Welborne Garden Village, and the Applicant met with the respondent on 10 November 2026 to progress discussions. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of the Project, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-356-83	Project timescales and programme	Land plots 11014 11015 and 11019 Impacts of DCO: now N3. Work on Master planning, design and scoping reserved matters applications has had to be paused for the adjacent eastern areas of Welborne until impacts during construction and operation of the DCO can be assessed. This is compounded by the lack of finalised proposals within the DCO, which are all marked as illustrative or indicative for the DCO elements close to Welborne.	Please refer to the Applicant's response to RR-356-4.
RR-356-84	Project timescales and programme	Land plots 11014 11015 and 11019 Impacts of DCO: now N4. This uncertainty and lack of ability to progress has influenced and impacted phasing discussions, as this area of Welborne will not be able to be progressed to delivery until the DCO impacts are known. These impacts are not likely to be able to be fully assessed until the DCO is completed, which based on the best case programme set out in the DCO documentation would be 2035.	Please refer to the Applicant's response to RR-356-4.
RR-356-85	Project timescales and programme	Land plots 11014 11015 and 11019 Impacts of DCO: now N5. This could lead to the delay of infrastructure being provided to service the wider Welborne scheme, which is required by certain trigger points which may not be met if this phase of development is consequently delayed by the DCO delivery. This will have an impact on the delivery of the Welborne, if these trigger points cannot be met. A critical example of this is the delivery of the access route to the Albany neighbourhood of Welborne, and then its subsequent link to the Welborne Sports Hub. This Sports Hub must be delivered prior to the occupation of the 3360th dwelling at Welborne, and there is a risk that this cannot be progressed whilst the DCO is being constructed (see C1-C6). If this continues until the estimated 2035 completion date (or later), this uncertainty could lead to the inability to meet this trigger point for infrastructure delivery, thereby halting the delivery of Welborne.	Please refer to the Applicant's response to RR-356-4.
RR-356-86	Location of AGP	Land plots 11014 11015 and 11019	Development of IPS-F on these land plots would not be located within the Welborne Garden Village boundary.

Reference	Theme	Issue raised	The Applicant's response
		Impacts of DCO: now N6. All of these elements pose limitations on progressing Welborne, including consideration of the future planning strategy related to the Albany Neighbourhood and associated infrastructure provision. As this neighbourhood forms part of a much wider consent and outline permission, these impacts and uncertainties then knock on to Welborne as a whole.	The Applicant is continuing to engage with the respondent regarding the Welborne Garden Village, and the Applicant met with the respondent on 10 November 2026 to progress discussions. The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of the Project, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-356-87	Landowner engagement	Land plots 11014 11015 and 11019 Impacts of DCO: now N7. Furthermore, the above risks and uncertainties also apply to the land outside of the Welborne boundary which would experience effects from these proposals, such as surrounding farmland. The uncertainties related to the DCO and proposals compound the ability to scope and plan for the future of these landholdings, in any context.	The Applicant notes this comment and is committed to working collaboratively with the respondent and other landowners and occupiers to address concerns and agree practical solutions wherever practicable. The Applicant is continuing to engage with the respondent regarding the Welborne Garden Village, and the Applicant met with the respondent on 10 November 2026 to progress discussions. Land will be restored to its original condition following the installation of the pipeline in accordance with the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), which includes the Outline Soil Resource Management Plan (SRMP) and will be developed further into the detail SRMP prior to commencement of construction. The surrounding landholdings will therefore be farmable following reinstatement and the respondent can continue with the current farming and shoot operations. Where access is required in the future for routine maintenance or repair, the Applicant will give reasonable notice of the intention to carry out the works. This notice period will normally be at least 7 days, unless a shorter period is agreed or it is an emergency.
RR-356-88	Project timescales and programme	Land plots 11014 11015 and 11019 Impacts of DCO: during construction C.1 From the submitted DCO documents, it is forecast that in a best case there will be a 5 year construction programme starting in 2028, with total of 7 years until the whole DCO will be operational. In this context, the construction impacts on Welborne will be significant. Within the Framework Construction Traffic Management Plan (7.2), the following construction access and compound arrangement is shown: [GRAPHIC]	See response to RR-365-11.
RR-356-89	Construction compound locations	Land plots 11014 11015 and 11019 Impacts of DCO: during construction C2. This access and compound incorporates this land plot, and thus there will be significant impact on the plot itself during the construction period, as well as impacts to adjacent land emanating from the works proposed. Precise impacts are uncertain, which has the effect of increasing risk (see N1-N7 of this table)	The location for Intermediate Pumping Station F (IPS-F) has been selected due to the reduced environmental impact and the ability to integrate the site into the existing and future landscape. The Scheme Development Report [APP-073, APP-074, APP-075] explains the process that was undertaken to select the location of IPS-F. IPS-F has been sited to avoid Welborne Garden Village land identified for allotments/recreation and avoid overhead power lines. It was identified to benefit from existing access and natural screening from an adjacent copse of trees and was considered to be less visually

Reference	Theme	Issue raised	The Applicant's response
		which will have impacts now, during construction and during operation of the DCO scheme.	prominent in this location. The Design Principles for IPS-F (see the Design Principles Document [APP-076]) include proposals for woodland and scrub planting and hedgerow enhancement. These proposals will help to provide visual screening for future residents of Welborne Garden Village, integrate IPS-F within the landscape and improve habitat connectivity for example. The DCO application includes a Framework Construction Traffic Management Plan [APP-415] which sets out the mitigation measures to reduce impacts on the highway network associated with construction traffic. This management plan has been developed in consultation with Hampshire County Council. The operational traffic impacts of IPS-F are assessed in the Transport Assessment (Appendix 18.1 of the ES [APP-186, APP-187, APP-188] and concluded to be negligible. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) sets out mitigation measures to reduce noise and vibration during construction. Detailed design would also seek to reduce operational noise and vibration as per design principle IPS-F_4 [APP-076].
RR-356-90	Construction impacts	<u>Land plots 11014 11015 and 11019</u> Impacts of DCO: during construction C3. Any use of this land will cease for agricultural purposes during construction and operation of the scheme. A series of amenity impacts will be present during construction which will be experienced within this plot as well as emanating from the use of the plot for construction purposes. This could include dust, noise, vibration and visual impact on the plot itself, adjacent land and occupiers including those at Albany Business Centre and Albany Farm.	ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1) assesses how changes to neighbourhood amenity may influence people's experience of their local environment, as a result of the Project. This assessment considers the outcomes of the assessment on dust (presented in ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1), noise and vibration (presented in ES Chapter 15 Noise and vibration [APP-094] and visual impact (presented in ES Chapter 13 Landscape and visual [APP-092]. The closest relevant receptor for this assessment was Wickham, approximately 2km north, with the assessment concluding a minor adverse, not significant effect. The health assessment, presented in ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1), assessed the impacts on the social infrastructure, including Albany Farm Care Home. During construction there would be changes to the care home as a result of constructing IPS-F in the vicinity and the use of a construction access route, which at its nearest would be 135m from the care home. This was assessed as a neutral adverse effect that is considered not significant, arising from the potential for increased stress and anxiety among certain individuals within the care home. ES Chapter 12 Land use and agriculture [APP-091] presented an assessment of the effects on community facilities, which included Albany Farm Care Home. As access to the care home would be maintained and no construction traffic would use the access in front of or near to the care home, this was assessed as a minor adverse effect which is considered not significant. ES Chapter 12 Land use and agriculture [APP-091] also confirms that the agricultural use of the land where Above Ground Plant (AGP) is sited will cease during construction and will remain unavailable throughout operation of

Reference	Theme	Issue raised	The Applicant's response
			the Project. ES Chapter 12 Land use and agriculture [APP-091] confirms that the AGP site of the affected land is of Subgrade 3b quality and that the extent of permanent loss would be 0.632ha, which is assessed as a minor adverse effect and not significant.
RR-356-91	Location of AGP	Land plots 11014 11015 and 11019 Impacts of DCO: during construction C4. These amenity impacts also will have a critical impact on the delivery of Welborne, with phases of development in the Albany Neighbourhood all subject to construction impacts from the DCO, likely leading to programme delays within these phases and in planning these phases throughout the construction phase of the DCO. This in turn will have an impact on the sales, marketing and occupation of development parcels	Please refer to the Applicant's response to RR-356-14.
RR-356-92	Location of AGP	Land plots 11014 11015 and 11019 Impacts of DCO: during construction C5. Construction of the DCO scheme will also inhibit access to this plot and surrounding land, accessed currently by a track which passes through this plot and adjacent plots.	The construction works will seek to retain existing access routes, and the details of this will be discussed with landowners prior to the commencement of construction works.
RR-356-93	EIA approach and methodology	Land plots 11014 11015 and 11019 Impacts of DCO: during construction C6. Any mitigation referenced within the DCO material related to the construction phase is shown as indicative at this stage, and therefore it is impossible to delineate the precise construction impact proposed. Furthermore, as the majority of the construction proposals themselves are also shown as indicative, the suitability of the mitigation is also unclear. This increases the uncertainty and thus likely impact on this land plot and its surroundings.	Please refer to the Applicant's response at RR-356-22.
RR-356-94	Location of AGP	Land plots 11014 11015 and 11019 Impacts of DCO: during operation O1. Critically, Pumping Station F will be located directly on the land which comprises this plot. This will have a direct impact on the plot and adjacent land during operation of the DCO Scheme.	Please refer to the Applicant's response at RR-356-89.
RR-356-95	Construction impacts	Land plots 11014 11015 and 11019 Impacts of DCO: during operation O2. Any use of this land will cease for agricultural purposes during construction and operation of the scheme. A series of amenity impacts will be present during operation which will be experienced within this plot as well as emanating from the use of the plot. This could include noise, vibration and	Please refer to the Applicant's response at RR-356-90.

Reference	Theme	Issue raised	The Applicant's response
		visual impact on the plot itself, adjacent land and occupiers including those at Albany Business Centre and Albany Farm.	
RR-356-96	Location of AGP	Land plots 11014 11015 and 11019 Impacts of DCO: during operation O3. These amenity impacts also will have a critical impact on the delivery of Welborne, with phases of development in the Albany Neighbourhood all subject to these operational impacts from the DCO. This could lead to the loss of development land which is sterilised by these impacts, or an increased mitigation burden to reduce impacts of the pumping station neighbouring the development. This in turn will have an impact on the sales, marketing and occupation of development parcels	The IPS-F site (Work No. 5A) will not directly impact land proposed for residential development. Please refer to the Applicant's response to RR-356-4 and RR-356-14, which explain the interface and therefore why the Project is not expected to delay the development of Welborne Garden Village. The ES provides an assessment of the effects of IPS-F (Work No. 5A) on future residents of Welborne Garden Village. The ES concludes that during operation, IPS-F (Work No. 5A) would not result in significant landscape and visual or noise and vibration effects on future residents of Welborne Garden Village. See RR-356-20 which provides further detail on the landscape and visual and noise and vibration assessments.
RR-356-97	Construction compound locations	Land plots 11014 11015 and 11019 Impacts of DCO: during operation O4. Operation of the DCO scheme will also inhibit access to this plot and surrounding land, accessed currently by a track which passes through this plot and adjacent plots. Please see C2 above for more details, as this track forms part of these plots.	Development of IPS-F (Work No. 5A) is not intending to permanently block the access track that currently passes through the site from the north west to the south east.
RR-356-98	EIA approach and methodology	Land plots 11014 11015 and 11019 Impacts of DCO: during operation O5. Any mitigation referenced within the DCO material related to the operation phase is shown as indicative at this stage, and therefore it is impossible to delineate the precise construction impact proposed. Furthermore, as the majority of the construction proposals themselves are also shown as indicative, the suitability of the mitigation is also unclear. This increases the uncertainty and thus likely impact on this land plot and its surroundings.	Please refer to the Applicant's response at RR-356-22.
RR-356-99	Design of AGP	Land plots 11014 11015 and 11019 Impacts of DCO: during operation O6. The DCO documents make reference to the need for a maintenance access to Pumping station F, which is shown indicatively requiring access from the Welborne development in Document 5.12 - Design Approach Document Pt2. No agreement or proposals for this access have been agreed with the landowner or with Welborne, nor has its impacts been adequately assessed related to Welborne.	Please refer to the Applicant's response to RR-356-23.

Reference	Theme	Issue raised	The Applicant's response
RR-356-100	Location of the proposed pipeline routes	Land plots 11014 11015 and 11019 Impacts of DCO: during operation O7. The easements proposed will have an impact on the agricultural use or operation of this land, whilst also sterilising it from any potential development or change of use (subject to promotion and relevant permissions).	Land plots 11-014, 11-015 and 11-019 are required for IPS-F (Work No. 5A). ES Chapter 12 Land use and agriculture [APP-091] confirms that the land affected is classified as Subgrade 3b quality. ES Chapter 12 Land use and agriculture [APP-091] confirms that the loss to agriculture and therefore to crop production and harvest yields will be permanent and irreversible but concludes that this loss represents a minor adverse effect on agricultural land and is not significant. Where construction activities affect agricultural business operations, land use activities or associated functions, engagement with affected parties would continue throughout the construction period and compensation would be payable in accordance with the relevant provisions of the DCO and the statutory compensation code.
RR-356-101	Landowner engagement	WLL and Buckland also is be named as a Category 2 Person of adjoining land plots in separate but connected ownership and in particular in relation to plots 12-004, 11-020, 11-023, 11-013, 12-010, where the proposed use of the plots will have an impact on the delivery of the Welborne development. In particular, all plots (to include 11-014, 11-015 and 11-019 which as noted above form immediately adjacent land to WLL's ownership which is to be compulsorily purchased) other than 12-004 were proposed to be used to satisfy BNG and other environmental obligations for the future reserved matters applications for the Welborne development. As noted above, 11-016 may fall within adjoining land ownership and where this is the case WLL would be named as a Category 2 Person.	The Applicant has undertaken diligent inquiry to obtain the details of persons with an interest in the Order Limits, as summarised in the Consultation Report [APP-029] Section 9.3.17 to 9.3.30. As part of this process, Land Interest Questionnaires (LIQs) were issued to the respondent ahead of the Summer 2024 Consultation to assist the respondent in identifying themselves, confirming contact details, and clarifying land ownership, occupation, tenancy arrangements and any other interests in land, including rights of way and option agreements. The LIQs also sought to confirm that land ownership and occupation boundaries were correctly identified. The Applicant received a response from the respondent in February 2024 confirming an interest the Applicant had identified and the Applicant incorporated the information into the diligent inquiry process. The Applicant then issued the respondent a Confirmation Schedule in October 2025, which summarised the Applicant's understanding of the respondent's interest in land relevant to the Project. The Applicant sought a response to confirm whether the information held was correct, however no response was provided despite a further reminder letter being issued in December 2025. The Applicant has since had further engagement with the respondent's land agent throughout September 2026 regarding their land interests and is now undertaking a review of their interests within the Order Limits. The Applicant is in the process of checking and verifying the information with the respondent and will update the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1) accordingly with any necessary amendments.
RR-356-102	The process of developing the Project	Attachments Drawing title: Proposed Works Overview, drawing no.: WEL-PBF-00-XX-DR-Z-00002 Figure 6 Sequencing Plan Figure 3 Illustrative Biodiversity Priority Areas in the context of other Priority Areas	The Applicant has had regard to these attachments in responding to this RR.

Reference	Theme	Issue raised	The Applicant's response
		Drawing title: Application Boundary Dec 18 Revision Drawing title: Access: Roads & Junctions Parameter Plan - Jun 19 Revision Drawing title: Land Use Parameter Plan - Mar 22 Revision Drawing title: Residential Density Parameter Plan - Jun 19 Revision Drawing title: Building Heights Parameter Plan - Jun 19 Revision Drawing title: Green Infrastructure Parameter Plan - Jun 19 Revision Drawing title: Biodiversity Enhancement Strategy Jigsaw Plan Drawing title: Application Boundary Plan, drawing no.: WEL-PBF-00-XX-DR-Z-00001 Strategic Design Code	

Table 2-70 The Applicant's response to RR-357 from Ian Judd and Partners on behalf of Westlands Farm Partnership

Reference	Theme	Issue raised	The Applicant's response
RR-357-1	Principle of development	Please see emailed Relevant Representation. Core position: The landowners do not object in principle to the public purpose of securing resilient water supplies. They object to the DCO in its present form insofar as it seeks or relies upon land, permanent rights, temporary working areas and mitigation land that have not been shown to be necessary, proportionate or adequately controlled.	The Applicant notes this comment.
RR-357-2	Landowner engagement	1. Key information (table) Interested parties - (Redacted) Address - Westlands Farm, Pricketts Hill, Shedfield, Southampton SO32 2JW Email - (Redacted)@westlandsfarm.co.uk Telephone - 07947 246669 Affected properties - Westlands Farm, Pricketts Hill, Shedfield, SO32 2JW; and Ford Farm, Bishop's Waltham, SO32 1DR Relevant operations - Westlands Farm; Westlands Soft Fruit Ltd; Westlands Farm Shop (Wickham) Ltd Land use - Soft-fruit production, improved grassland, cattle and sheep grazing, water meadow and farm-shop access Approximate pipe length - 765 m across the affected ownership Land agent - Ian Judd and Partners, 4 High Street, Bishop's Waltham, Southampton, Hampshire SO32 1AB | 01489 896422 | henry@ianjuddandpartners.co.uk	The Applicant notes this comment.
RR-357-3	Landowner engagement	Land plan schedule (table) Plot - 15-014 Area - 3,787 m² / 0.38 ha / 0.94 acres Power / status shown - Acquisition of rights	The Applicant notes this comment.

Reference	Theme	Issue raised	The Applicant's response
		Plot - 18-009 Area - 94 m² / 0.02 ha / 0.05 acres Power / status shown - Acquisition of rights Plot - 18-010 Area - 5,672 m² / 0.56 ha / 1.40 acres Power / status shown - Acquisition of rights (drilled section) Plot - 18-011 Area - 23,435 m² / 2.34 ha / 5.79 acres Power / status shown - No rights sought; identified mitigation/enhancement land Plot - 18-012 Area - 62 m² / 0.01 ha / 0.02 acres Power / status shown - No rights sought; identified mitigation/enhancement land Plot - 18-014 Area - 14,529 m² / 1.45 ha / 3.59 acres Power / status shown - Acquisition of rights Plot - 18-015 Area - 20,963 m² / 2.10 ha / 5.18 acres Power / status shown - No rights sought; identified mitigation/enhancement land Plot - 18-016 Area - 10,827 m² / 1.08 ha / 2.68 acres Power / status shown - Acquisition of rights Plot - 18-017 Area - 6,436 m² / 0.64 ha / 1.59 acres Power / status shown - Acquisition of rights Plot - 18-018 Area - 8,952 m² / 0.89 ha / 2.21 acres Power / status shown - Temporary rights / proposed compound Plot - 18-019 Area - 6,675 m² / 0.66 ha / 1.65 acres Power / status shown - No rights sought; identified mitigation/enhancement land	
RR-357-4	Landowner engagement	Totals shown in the application: 41,445 m² / 4.144 ha / 10.24 acres subject to acquisition of rights; 8,952 m² / 0.89 ha / 2.21 acres subject to temporary rights; 51,135 m² / 5.11 ha / 12.64 acres identified as mitigation or enhancement land over which no rights are presently sought.	The Applicant notes this comment.
RR-357-5	Landowner engagement	2. Summary of the representation We request to be registered as Interested Parties and submit a strong objection to the DCO in its present form insofar as it affects Westlands Farm and Ford Farm. The objection is directed principally to the extent and location of the Order Limits, the acquisition of permanent rights, the proposed working width, the	**Order Limits and the Acquisition of Permanent Rights** The Applicant acknowledges the respondent's comments in relation to the Order Limits and acquisition of permanent rights. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant

Reference	Theme	Issue raised	The Applicant's response
		undefined environmental mitigation and enhancement areas, the altered pipeline alignment at Ford Farm, the proposed construction compound, and the absence of adequate protection for access, drainage, soils and the affected businesses. The application seeks substantial flexibility while leaving important matters to later detailed design. That approach transfers an excessive and inadequately defined burden to the landowners. Compulsory powers should be confined to what Southern Water can demonstrate is genuinely required.	considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance. **Proposed Working Width** The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline Construction Environment Management Plan (CEMP) (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). This would provide the necessary space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas, and enable safe and efficient construction operations. This is set out at section 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. As detailed within the Statement of Reasons (APP-025), the design of the Project provides flexibility for refinement informed by further surveys and investigations at the detailed design stage. The detailed design will be developed following approval of the DCO application and the appointment of a Contractor. This approach ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs. **Environmental Mitigation and Enhancement Areas** The Applicant confirms that the environmental mitigation and enhancement areas are defined within Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). The Applicant confirms that mitigations to impacts on landowner access during construction, pre and post works drainage and soil management are included within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). Within Table 5-1 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), the Applicant has outlined measures such WE4 and WE5, which outlines that a Construction Drainage Plan will be prepared by the Contractor, and measure LUA1 which describes the Soil Resource Management Plan that would prepared in line with the Outline Soil Resource Management Plan contained within Appendix B. The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use the land in the existing manner but confirms that alternative arrangements will be made to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements will be discussed with the respondent following the detailed design. **Detailed Design** The detailed design of the Project will be developed as a post-consent activity and subject to approval by the relevant authorities. Prior to undertaking detailed design, it is not possible to confirm the precise area of land required for the project. Notwithstanding this, the detailed design produced by the

Reference	Theme	Issue raised	The Applicant's response
			contractor appointed by Applicant would be in accordance with controls secured through the DCO, which include the extents of the Order Limits, Works Plans [APP-012, APP-013 and APP-014] and the Design Principles Document [Document reference 5.11, DCO Volume 5, Version 1]. The requirement to produce a detailed design is also captured in 3.1 Draft Development Consent Order [APP-023] (Schedule 2, Part 1, Section 3).
RR-357-6	Location of the proposed pipeline routes	Issue: Route at Ford Farm Position sought: Reinstate the earlier alignment wholly within the water-meadow/cattle-grazing area unless Southern Water demonstrates, with comparative engineering and environmental evidence, why that alignment is no longer practicable.	The Applicant understands that the 'water-meadow/cattle-grazing area' refers to the area of land east of the polytunnels and west of the River Hamble. At no point in the development of the Project did the Applicant propose that Pipeline would be located entirely in this land. At the Summer 2024 Consultation the Applicant consulted on a design that passed through the centre of the field and therefore through land proposed for polytunnel expansion. As a result, the Applicant revised the design to move the Pipeline eastwards to avoid intersecting the proposed polytunnel expansion land, so that part of the pipeline route was within this water meadow area. This change, along with a revised crossing of the River Hamble, was consulted on at the Spring 2025 Consultation. Sections F.9.2 to F.9.8 of the Scheme Development Report – 3 of 3 documents [APP-075] report on the reasons for the design refinement at the River Hamble and Ford Farm between the Summer 2024 Consultation and Spring 2025 Consultation. Moving the Pipeline further east as suggested by the respondent would move the Pipeline and the associated construction works into land that is at risk of flooding and pose greater environmental impacts to the River Hamble and downstream ecological sites. The Applicant wrote to the respondent on 16 December 2025 with responses to the feedback they raised at the Summer 2024 and Spring 2025 consultations. Within this correspondence, the Applicant confirmed that changes had been made to the pipeline route based on the feedback provided. Further information can also be found within the Consultation Report [APP-029].
RR-357-7	Landowner engagement	Issue: Permanent rights Position sought: Limit acquisition of permanent rights to the minimum demonstrably required for the installed pipe and its safe maintenance. The present 11 m easement has not been justified.	The purpose of the easement is to protect the integrity and operational requirements of the pipeline and to ensure appropriate access for inspection, maintenance, repair and replacement activities. The required width has been determined following a detailed technical assessment, taking account of the pipeline's diameter, depth, construction methodology, location and operational function. For sections of pipeline installed using open-cut construction, the Applicant is seeking an easement width of 11m (5.5m either side of the pipeline). This reflects the access and operational requirements associated with maintaining and, if necessary, excavating the pipeline in the future. Notably, this represents a reduction from the Applicant's published stand-off guidance for water mains of a comparable size and depth [1], which would typically require a wider protected corridor. This reduction from the normal requirement has been communicated to landowners and their agents where this is being challenged.

Reference	Theme	Issue raised	The Applicant's response
			The Applicant is therefore satisfied that the easement widths proposed represent the minimum reasonably required to protect the pipeline and secure its safe operation over its lifetime. As detailed within the Statement of Reasons [APP-025], temporary use powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the Project.
RR-357-8	Landowner engagement	Issue: Environmental mitigation Position sought: The 12.64 acres identified for mitigation or enhancement are not available. They must not be relied upon, restricted or treated as committed land without a fully defined proposal and a separate voluntary agreement.	The Applicant wrote to the respondent on 3 September 2026 seeking to discuss the proposed Environmental Mitigation and Enhancement Areas. The Applicant is open to working collaboratively with the respondent to define how the works will be delivered and secured through a voluntary agreement but confirms that there is provision for Environmental Mitigation within the respondent's land, within plot 18-010 of the DCO. The associated compulsory acquisition rights for the Environmental Mitigation areas only are defined within the Draft Development Consent Order [APP-023].
RR-357-9	Construction impacts and effects	Issue: Temporary working land Position sought: Adopt a 20 m target working corridor and no more than 24 m for ordinary open-cut works unless a wider site-specific requirement is evidenced. Remove broad flexibility unrelated to identified works.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, which is secured through the Outline Construction Environment Management Plan (CEMP) (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3)). This would provide the necessary space for a haul road, construction working areas, material storage areas, pipeline trench and soil storage areas. This is set out at section 3.5.92 of ES Chapter 3 Description of the Proposed Development [APP-082]. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3)). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m, over a distance of a maximum of 42m. The haul road/working area must be a sufficient width to allow a suitably sized excavator to track back at 90 degrees to the pipe to lift it and then lower into the trench. A suitably sized excavator capable of carrying out a tandem lift of a string of pipes would circa 11m long hence the 11m required. The working area for the trench excavation is calculated using the width of the excavator capable of pipeline installation (circa 3.5m) and a 2m deviation of the pipeline route in each direction without compromising the pipelaying process. If the Pipeline has to change direction the joints are designed to allow a slight angle deviation to alter the direction this is a gradual process and requires sufficient space to allow for it. Therefore, a total of 7.5m. The pipe storage/jointing area must be wide enough to allow the pipes to be welded together to form the strings before lowering into the trench. As there will be welders working on this while the excavator is operating a 1m safety

Reference	Theme	Issue raised	The Applicant's response
			exclusion zone has to be in place. The total of the pipe storage/jointing area is therefore a total of 3.5m The area required for topsoil storage is based on topsoil being 200mm thick, which equates to 8m3 for a 40m working width. With a side slope of 1:1 and maximum height of 1.8m an area of 7m has been allocated which includes for any bulking factor. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The area required for subsoil provides enough width in this area to segregate upper and lower subsoils, therefore there would be two separate mounds, which ensures the subsoil can be reinstated properly. A 1:1 side slope and a bulking factor has been incorporated which equates to 7m. Either side of the stockpile, safety exclusion zones of 1m have been incorporated bringing the total to 9m. The above areas equate to a working width of 40m.
RR-357-10	Traffic and transport	Issue: Access and trading Position sought: Maintain continuous safe access for articulated lorries, LGVs, customers, staff and emergency vehicles at both farms and the Wickham farm shop.	The Applicant acknowledges the concerns raised regarding access for articulated lorries, Light Goods Vehicle (LGV) and other vehicles to Westlands Farm, Soft Fruit and Farm Shop. As detailed in the Traffic Management Strategy (TMS) [APP-416], road closures would be required on Blind Lane and Pricketts Hill, east of the access to Westlands Farm Shop. These closures would likely be for under two weeks, with a worst case for up to one month. During these road closures, vehicular access would be retained from the north via Pricketts Hill and High Street.
RR-357-11	Construction compound locations	Issue: Compound 18-018 Position sought: Relocate the compound from steep, wet, former-landfill ground crossed by a Roman road, or disclose the investigations and alternatives assessment said to justify it.	The suitability of each compound site has been reviewed in consultation with technical specialists, and mitigation measures will be incorporated where necessary to ensure safe and stable construction. The location of construction compound K-2 was reviewed following this issue being raised at the Spring 2025 Consultation, and it was confirmed that this location remained suitable for the construction compound. The initial site selection for the construction compounds was informed by environmental and technical reviews. The Scheme Development Report [APP-073, APP-074, APP-075] sets out how construction compounds have been sited. ES Chapter 7 Archaeology and cultural heritage (Document reference 6.1, DCO Volume 6, Version 1) sets out an assessment of the effects of the Project on the historic environment taking the worst case pre mitigation assumption that any and all archaeological remains within the Order Limits would be removed during construction works. Mitigation would comprise a combination of micro-siting of intrusive works where reasonably practicable with investigative mitigation where effects could not be avoided and sensitive restoration of earthworks and landscape features (e.g. hedgerows) where appropriate.

Reference	Theme	Issue raised	The Applicant's response
RR-357-12	Land use and agriculture	3. The farms and affected businesses Ford Farm comprises approximately 94.63 acres (38.29 ha). It supports the production of strawberries and raspberries for supermarkets and the Westlands farm shops, together with beef and lamb production. Westlands Farm accommodates the Wickham farm shop and associated farming and commercial activity. The soft-fruit enterprise is an established, high-value business with further expansion planned within approximately 18 months. Additional polytunnels are proposed on the pasture land north and east of the existing tunnel development. Capacity, water, power, drainage and access planning for that expansion is active work, not a speculative aspiration.	The Applicant notes this description of the existing use of the land. Westlands Farm Shop is identified within ES Chapter 12 Land use and agriculture [APP-091] as a business within the study area and has been considered as part of the assessment. ES Chapter 12 Land use and agriculture [APP-091] considers the effects of temporary or permanent loss of agricultural land and impacts on agricultural land use, including impacts on the viability or operational capacity of individual farm holdings. The Applicant has undertaken engagement with landowners and occupiers to understand the extent and nature of land holdings, agricultural operations and business activities. Given the short-term and temporary nature of the pipeline installation, it is not anticipated that there would be any likely significant effects arising from ongoing farm viability issues that cannot be resolved through measures secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), including ongoing discussion and negotiation. If during engagement it is determined that business operations including agricultural business operations, land use activities or any other functions linked to the affected structures will be affected or interrupted then compensation is payable in accordance with the relevant provisions of the DCO and the statutory compensation code.
RR-357-13	Landowner engagement	During the summer harvest period, the principal Ford Farm access is used by at least two articulated fruit lorries per day, together with numerous LGVs, staff vehicles, agricultural machinery and other deliveries. Uninterrupted access is essential to harvesting, packing and dispatch.	As secured within the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), as secured by Requirement 3 of the draft Development Consent Order [APP-023], the Applicant confirms access provisions will be incorporated into temporary fencing where reasonably practicable to maintain access for the respondent. This will allow access across the construction working width and thereby mitigate temporary severance. The Applicant welcomes further engagement with the respondent to discuss potential mitigations. This measure is also outlined in the Commitments Register (ES Appendix 5.5) (APP-108) reference Mit-GT 248.
RR-357-14	Landowner engagement	The Wickham farm shop currently generates approximately £110,000 of turnover per month and sells a high proportion of perishable goods. Any closure or serious restriction of its principal access could cause immediate trading loss, stock loss and wider damage to customer confidence.	The Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. Compensation will be assessed on a case-by-case basis, subject to the production of evidence and proof of loss. As outlined within the Framework Construction Traffic Management Plan [APP-415] Pricketts Hill will require a temporary road closure whilst the temporary accesses onto the works corridor are constructed. The Applicant will seek to mitigate the extent of temporary road closures associated to these works which are in the vicinity of the farm shop.

Reference	Theme	Issue raised	The Applicant's response
RR-357-15	Location of the proposed pipeline routes	4. Ford Farm pipeline alignment Southern Water previously presented an alignment which kept the pipeline entirely within the water meadow and cattle-grazing area. The latest alignment appears to have moved approximately 50 m west, bringing it along the bottom of the field proposed for the next polytunnel development.	Please refer to the Applicant's response at RR-357-6.
RR-357-16	Landowner engagement	We do not claim that the current alignment makes the polytunnel development impossible. It nevertheless creates avoidable inconvenience and conflict beside a planned intensive horticultural development, including construction interface, drainage, access, biosecurity, future maintenance and the restrictions attached to permanent rights.	The Applicant acknowledges that the respondent's land will be temporarily impacted by open-cut trenching construction methodology for construction of the pipeline. The Applicant has identified a need for a 40m working width in areas where the pipeline is constructed by open-cut trenching. As set out by the respondent, the land is used for agricultural purposes, including the horticultural development outlined. None of the restrictions set out in Schedule 5 to the Draft Development Consent Order [APP-023] will prohibit the respondent from continuing to use the land for this purpose once construction is complete. The Applicant notes the comments regarding the proposed expansion of the polytunnel development and is committed to working collaboratively with landowners and occupiers to address concerns and agree practical solutions wherever practicable. The Applicant most recently met with the respondent and their representative on 3 November 2026 to discuss these matters further and consider how future development aspirations can be coordinated.
RR-357-17	Location of the proposed pipeline routes	No clear engineering, environmental or land-use justification has been provided to us for departing from the previous water-meadow alignment. Southern Water's Spring 2025 material stated that the revised route was intended to avoid conflict with the proposed polytunnels. The latest apparent shift therefore requires a clear explanation and a plan-based comparison.	Please refer to the Applicant's response at RR-357-6.
RR-357-18	Location of the proposed pipeline routes	Requested change: Reinstate the previous alignment entirely within the water-meadow/cattle grazing area. If Southern Water does not agree, it should provide the two alignments on a common plan and disclose the engineering, environmental and operational reasons why the earlier alignment is said to be impracticable.	Please refer to the Applicant's response at RR-357-6.
RR-357-19	Landowner engagement	5. Environmental mitigation and enhancement land The application identifies 12.64 acres of our land, principally within plots 18-011, 18-012, 18-015 and 18019, for environmental mitigation or enhancement while apparently seeking no compulsory rights over those plots.	The Applicant confirms that no compulsory acquisition rights are sought in plots 18-011, 18-015 and 18-019. These plots have been identified to deliver additional environmental enhancement within the Order Limits as shown in Sheet 18 and 19 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2). These enhancements are not necessary for the delivery of the Project and therefore consent is sought from landowners to deliver these environmental enhancements by voluntary agreement only. Notwithstanding the above, the Applicant wishes to confirm that compulsory powers have been sought on plot 18-010, also owned by the respondent, which is an environmental mitigation area necessary to deliver the Project.

Reference	Theme	Issue raised	The Applicant's response
			Following diligent inquiry, the Applicant has not been made aware that the respondent has an interest in plot 18-012.
RR-357-20	Landowner engagement	We have not been given a sufficiently defined proposal explaining what works would be undertaken, who would carry them out, the duration of the commitment, the management obligations, access requirements, restrictions on farming or development, liability for failure, interaction with subsidies or environmental schemes, tax consequences, restoration obligations, or compensation.	The Applicant wrote to the respondent on 3 September 2026 seeking to discuss the proposed Environmental Mitigation and Enhancement Areas. The Applicant is open to working collaboratively with the respondent to define how the works will be delivered and secured through a voluntary agreement. Please also refer to the Applicant's response at RR-357-19. Further information on the Environmental Mitigation and Enhancement Areas can be found in the Outline Landscape and Ecology Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3).
RR-357-21	Landowner engagement	Accordingly, we do not consent to those 12.64 acres being made available, treated as committed, relied upon in the Environmental Statement, counted towards mitigation or enhancement delivery, or subjected to any restriction at this stage. The land must not be assumed to be available merely because no compulsory rights are presently sought.	The provision of environmental mitigation outlined on the respondent's land is necessary to mitigate the potential adverse environmental effects of the Project that have been assessed and reported in the Environmental Statement [APP-080 to APP-411]. The Applicant is therefore seeking appropriate powers of compulsory acquisition to safeguard the delivery of the environmental mitigation, which is secured in the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). The Applicant confirms that there is provision for Environmental Mitigation within the respondent's land, secured within plot 18-010 outlined in the Sheet 18 of Land Plans (Document reference 2.2, DCO Volume 2, Version 2). The associated compulsory acquisition rights are defined within the draft Development Consent Order [APP-023]. The Applicant confirms that no compulsory acquisition rights are sought over plots 18-011, 18-015 and 18-019 identified for additional environmental enhancement. The Applicant is open to working collaboratively with the respondent to secure a voluntary agreement for the land identified for additional environmental enhancement. The Applicant wrote to the respondent on 3 September 2026 seeking to discuss the proposed Environmental Mitigation and Enhancement Areas. The Applicant is open to working collaboratively with the respondent to define how the works will be delivered and secured through a voluntary agreement.
RR-357-22	Landowner engagement	Any future proposal must be fully specified and considered under a separate voluntary agreement, with independent professional advice and appropriate payment for land value, management, risk, loss of flexibility and professional costs. Until then, the identified areas should be removed from the project mitigation proposals or replaced with land controlled by Southern Water.	The Applicant wrote to the respondent on 3 September 2026 with a proposal for a voluntary agreement and would welcome the opportunity to discuss this further with the respondent. The Applicant is engaging with the respondent's representative on the matter and most recently met with the respondent and their representative on 3 November 2026 to discuss their feedback further.
RR-357-23	Landowner engagement	6. Plot-specific objections 6.1 Plot 18-010 - drilled section Plot 18-010 is understood to form part of a drilled or trenchless section. Southern Water should explain precisely why the full category of new rights	The Applicant's proposed use of the land is set out in the Works Plans [AS-008] with detail of each Works Number set out in 'Schedule 1 – Authorised Development' to the Draft Development Consent Order [APP-023].

Reference	Theme	Issue raised	The Applicant's response
		shown is required. Any permanent right should be limited to the subsurface pipeline and the narrowest protection zone demonstrably necessary. General surface construction, storage or access rights should be removed, with surface entry limited to genuine emergency or defined maintenance circumstances and subject to notice, reinstatement and compensation.	The respondent is affected by 'Works No.4 – Pipeline between the WRP site and Otterbourne WSW' and 'Works No.7 – Environmental Mitigation and Enhancement Area' for which the Applicant is seeking the acquisition of rights and temporary possession powers as set out in the Sheet 18 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2). In relation to the Environmental Mitigation and Enhancement Area, reference EMEA-K-1a provides details on associated works within the Design Principles Document [APP-076] including protected species mitigation and associated planting. As detailed within the Statement of Reasons [APP-025], temporary use possession powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the Project. Whilst the Applicant's preference is to reach a voluntary agreement, it considers that the temporary possession powers sought within the DCO are necessary to ensure that the Project can be delivered where agreement cannot be reached. Reasonable losses incurred by landowners arising out of the temporary use of land will be reimbursed in line with the Compensation Code.
RR-357-24	Location of the proposed pipeline routes	6.2 Plot 18-016 - polytunnel field and farm access The current corridor runs along the bottom of the field intended for further polytunnels. For the reasons in section 4, the alignment should be returned eastwards into the water-meadow/cattle-grazing area.	Please refer to the Applicant's response at RR-357-6.
RR-357-25	Construction impacts and effects	The corridor also crosses the principal access track. Safe access suitable for articulated fruit lorries, LGVs, staff, emergency vehicles and farm machinery must be maintained at all times. A general promise to manage access later is not sufficient; the protection should be secured in the DCO, a farm-specific management plan and any private agreement.	The Applicant acknowledges the importance of maintaining access to Ford Farm during construction. Access provisions would be incorporated into temporary fencing, where reasonably practicable, to maintain access across the construction working width and mitigate temporary field severance. As secured within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3) and by Requirement 3 of the Draft DCO [APP-023], the Applicant confirms access provisions will be incorporated into temporary fencing where reasonably practicable to maintain access for the respondent. This will allow access across the construction working width and thereby mitigate temporary field severance. The Framework Construction Traffic Management Plan [APP-415] and the Traffic Management Strategy [APP-416], which have been developed in consultation with the relevant highway authorities, provide the framework for detailed, activity-specific traffic management strategies to be approved post-consent through DCO requirements.

Reference	Theme	Issue raised	The Applicant's response
RR-357-26	Construction compound locations	6.3 Plot 18-018 - proposed construction compound The proposed compound is on steep, wet ground understood to include former landfill or made ground. A Roman road also passes through the proposed compound area. These conditions raise questions concerning physical suitability, contaminated land, ground gas, stability, drainage, archaeology and safe HGV access.	The suitability of each compound site has been reviewed in consultation with technical specialists, and mitigation measures will be incorporated where necessary to ensure safe and stable construction. The location of construction compound K-2 was reviewed following this issue being raised at the Spring 2025 Consultation, and it was confirmed that this location remained suitable for the construction compound. The initial site selection for the construction compounds was informed by environmental and technical reviews. The Scheme Development Report [APP-073, APP-074, APP-075] sets out how construction compounds have been sited. ES Chapter 7 Archaeology and cultural heritage [APP-086] sets out an assessment of the effects of the Project on the historic environment taking the worst case pre mitigation assumption that any and all archaeological remains within the Order Limits would be removed during construction works. Mitigation would comprise a combination of micro-siting of intrusive works where reasonably practicable with investigative mitigation where effects could not be avoided and sensitive restoration of earthworks and landscape features (e.g. hedgerows) where appropriate. Table 5-1 in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) provides mitigation measures that will apply during the construction of the Project. Measures LQGC1 to LQGC15 seek to ensure that issues related to land quality and ground conditions are managed appropriately during construction. This includes: • Preparation of plans describing measures to be adopted in the event of encountering expected and unexpected contamination in accordance with current guidance and legislation • Storage of contaminated soils in demarcated areas with soils placed on impermeable surfaces to prevent contamination of the underlying ground • Implement controls for containing surface water run-off from contaminated stockpiles to prevent the uncontrolled discharge of contaminated effluent. • In areas which are considered to represent a potentially unacceptable risk to land quality and ground conditions receptors, remediation strategies will be developed following the guidance provided within the appropriate contaminated land statutory guidance and, for example, the EA Land Contamination Risk Management Framework Access was not permitted to this area during the ground investigation works, therefore it was not possible to undertake soil sampling for land quality assessment, geotechnical assessment or ground gas monitoring. Ground investigation would have provided additional information on the ground conditions and assisted with mitigation measures. Section K Ground Investigation locations are presented in ES Appendix 11.2 Geotechnical and geo-environmental reports (Document reference 6.2, DCO Volume 6, Version 1 for document 8 of 18 documents).

Reference	Theme	Issue raised	The Applicant's response
			As set out in the Outline Construction Traffic Management Plan [APP-415], a single temporary access is proposed on Winters Hill to provide access to temporary construction compound K-3. From this access, temporary construction compounds K-1, K-2 and K-4 would be accessed via the haul road. The access would be designed to accommodate left-in and right-out movements for HGVs. Site operatives would also be made aware of the constrained nature of the road to the west of the site and be required to access from the east via Winchester Road. This would be reinforced with signage at the site access. Measures would be implemented to manage the interaction between the haul road and the PRoW within the local area. This would include the use of a traffic marshal at the haul road intersections with PRoW to minimise the potential for conflict between construction vehicles and pedestrian. The HGV access route to the Winters Hill access would route from Junction 7 of the M27, and use a combination of the Botley Bypass, the B3035 Botley Road, the B2177 Winchester Road prior to turning left onto Winters Hill where temporary access would be provided.
RR-357-27	Construction compound locations	The compound should be relocated. If Southern Water maintains this proposal, it should disclose the site investigations, contamination and ground-gas assessment, geotechnical assessment, drainage strategy, archaeological evaluation, access design and comparative assessment of alternative sites before any power is granted.	Please refer to the Applicant's response at RR-357-26.
RR-357-28	Location of the proposed pipeline routes	6.4 Plots 15-014 and 15-015 - Westlands Farm Shop The route and associated highway works affect or clip the entrance serving Westlands Farm Shop. Pricketts Hill is the principal means of customer, staff and delivery access. Closure or material restriction, particularly if the road is open-cut, could make continued trading impracticable for the period of the works.	Please refer to the Applicant's response at RR-357-29.
RR-357-29	Traffic and transport	With turnover of approximately £110,000 per month and substantial perishable stock, even a relatively short closure could cause serious loss. Southern Water should be required to maintain access throughout, provide a detailed traffic and business-access plan, phase or trenchlessly construct the crossing where practicable, give adequate advance notice, preserve signage and delivery access, and compensate all evidenced loss.	As detailed in the Traffic Management Strategy (TMS) [APP-416], road closures would be required on Blind Lane and Pricketts Hill, east of the access to Westlands Farm Shop. These closures would likely be for under two weeks, with a worst case for up to one month. During these road closures, vehicular access would likely be fully or partially retained from the north via Pricketts Hill and High Street. Signage would be provided to inform drivers of the diversion routes.
RR-357-30	The draft DCO	7. Need for and proportionality of compulsory powers Section 122 of the Planning Act 2008 requires the Secretary of State to be satisfied that land subject to compulsory acquisition is required for the development, or required to facilitate or be incidental to it, and that there is a compelling case in the public interest. Interference with private property must also be necessary and proportionate.	The Applicant considers that the tests in section 122 of the Planning Act 2008 are met. As set out in the Statement of Reasons [APP-025], the land and rights sought are required for, facilitate, or are incidental to the construction, operation, maintenance and protection of the Project. The Applicant has sought to minimise interference with private interests by limiting the powers sought to those reasonably necessary and, where appropriate, acquiring rights

Reference	Theme	Issue raised	The Applicant's response
			rather than freehold interests. The extent of the Order Land has been refined through the development process and alternatives have been considered. For the reasons set out in the Statement of Reasons [APP-025], the Applicant considers there is a compelling case in the public interest for the powers sought and that any interference with private rights is necessary, justified and proportionate. The Applicant considers that in the absence of these powers, the Scheme may not be assembled, undermining water supply resilience, environmental objectives and planned growth in an area already subject to serious water stress.
RR-357-31	Landowner engagement	Across our ownership, the application encompasses approximately 10.24 acres for acquisition of rights, 2.21 acres for temporary rights and 12.64 acres identified for mitigation or enhancement: approximately 25.09 acres in aggregate for about 765 m of pipe. Expressed as a simple area-to-length comparison, that is equivalent to approximately 135 m average width. We recognise that the plots are not all a continuous construction corridor, but the comparison illustrates the extraordinary aggregate scale of land affected and the need for a transparent plot-by-plot justification.	The Applicant notes the respondent's comments. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] set out the factors that the Applicant considers demonstrate that the conditions in section 122 of the Planning Act 2008, and the considerations set out in the Compulsory Acquisition Guidance, are satisfied. The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. In this location, flexibility in the Order Limits has been so that the loss of trees at field boundaries can be reduced as far as practicable, taking account of further surveys following approval of the DCO application. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs.
RR-357-32	The draft DCO	Southern Water has not provided us with a sufficiently detailed design or schedule explaining, for each plot, which rights are required, the area over which each right will be exercised, why a lesser right or narrower area would not suffice, and what alternative was considered. Flexibility for future design cannot itself justify acquiring the maximum conceivable area by compulsion.	The land and rights proposed to be acquired are identified in the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1), Land Plans and Works Plans submitted as part of the DCO application. The extent of the rights sought has been informed by the current Project design and engineering requirements and is considered reasonably necessary for the construction, operation, maintenance and protection of the Project. The Applicant has sought, where appropriate, to acquire rights rather than freehold interests in order to reduce impacts on affected land interests. The rights sought represent the minimum rights considered necessary at this stage of the Project's development, whilst providing sufficient flexibility to ensure the

Reference	Theme	Issue raised	The Applicant's response
			authorised development can be constructed, operated and maintained safely and effectively. The Applicant remains willing to engage with affected landowners to discuss plot-specific concerns and, where appropriate, refine requirements as the detailed design progresses. However, the Applicant is satisfied that the rights sought are proportionate, justified and no more extensive than is reasonably necessary to facilitate delivery of the Project.
RR-357-33	Landowner engagement	Requested control: The Order Limits and rights schedules should be redrawn around the minimum construction and operational footprint. Land required only for optional storage, general flexibility or an undefined future use should not be subject to compulsory powers.	As detailed within the Statement of Reasons [APP-025], temporary use powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the Project. As such, compulsory acquisition powers will not be used for general flexibility or an undefined future use. The detailed design will be produced in accordance with controls secured through the DCO, which include the extents of the Order Limits, Works Plans [APP-012, APP-013 and APP-014] and the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). Section 1.6.3 of the Statement of Reasons [APP-025] set out the factors that the Applicant considers demonstrate that the conditions in section 122 of the Planning Act 2008, and the considerations set out in the Compulsory Acquisition Guidance, are satisfied.
RR-357-34	Construction impacts and effects	8. Scale of the temporary working area The application material appears to refer in different places to maximum working widths of 40 m and up to 50 m. That discrepancy should be resolved. The indicative construction graphic reproduced below shows a working/haul area and trench occupying materially less space, with much of the additional width attributed to soil storage.	The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m for a maximum length of 42m.
RR-357-35	Construction impacts and effects	Indicative open-cut pipeline construction arrangement reproduced from the application material (Environmental Statement, Chapter 3 / document reference 6.1). Our indicative review suggests that ordinary open-cut construction should generally be achievable within a corridor of approximately 20-24 m, allowing for a haul route, safe plant working area, trench, pipe handling, segregated topsoil/subsoil storage, fencing and reasonable tolerance. Southern Water	Please refer to the Applicant's response to RR-357-34.

Reference	Theme	Issue raised	The Applicant's response
		must provide its engineering and soil-volume calculations if it contends that 40-50 m is routinely necessary.	
RR-357-36	Location of the proposed pipeline routes	Our requested approach is a 20m target corridor, with an absolute ordinary open-cut working width of no more than 24m unless Southern Water demonstrates a site-specific exception. Passing places, compounds or exceptional stockpiles should be separately identified and justified rather than embedded in a general corridor. Additional land wanted for convenience should be obtained by voluntary agreement at a market rent and on protective terms.	The Applicant has included the minimum amount of land necessary to deliver the Project within the Order Limits whilst ensuring suitable flexibility is retained until the detailed design has been confirmed. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the Project. This approach to flexibility ensures efficiency in the design, consenting and delivery processes and is commonly applied to projects of national significance that are developed over a long period of time. It also provides benefits for customers by providing the Contractor with flexibility for innovation and lower whole life costs. The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas. When intersecting sensitive constraints such as vegetation and roads, a reduced working width of 20m would be utilised as secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). Where a reduced working width is used, there would be no space available to store excavated material. Therefore, the working width either side of the length that is reduced may need to be widened up to 50m for a maximum length of 42m.
RR-357-37	Location of the proposed pipelines	9. Permanent easement and rights Southern Water has indicated an 11m permanent easement for open-cut sections, while a materially narrower width of approximately 5 m appears to be contemplated for tunnelled sections. No adequate explanation has been provided for that difference or for the restrictions that would apply within the 11m corridor.	The purpose of the easement is to protect the integrity and operational requirements of the pipeline and to ensure appropriate access for inspection, maintenance, repair and replacement activities. The required width has been determined following a detailed technical assessment, taking account of the pipeline's diameter, depth, construction methodology, location and operational function. For sections of pipeline installed using open-cut construction, the Applicant is seeking an easement width of 11m (5.5m either side of the pipeline). This reflects the access and operational requirements associated with maintaining and, if necessary, excavating the pipeline in the future. Notably, this represents a reduction from the Applicant's published stand-off guidance for water mains of a comparable size and depth [1], which would typically require a wider protected corridor. This reduction from the normal requirement has been communicated to landowners and their agents where this is being challenged. For sections constructed using trenchless techniques, a reduced easement width is considered appropriate, taking into account depth, construction methodology and location. As the pipeline is installed at greater depth and future maintenance or operational access would be undertaken from either side of the trenchless section rather than directly above it, the same level of restriction is not required. The easement width has therefore been tailored to

Reference	Theme	Issue raised	The Applicant's response
			reflect the differing operational requirements of the construction methodologies. The Applicant is therefore satisfied that the easement widths proposed represent the minimum reasonably required to protect the pipeline and secure its safe operation over its lifetime.
RR-357-38	Location of the proposed pipelines	Our present position is that permanent rights should be limited to the minimum required for the pipe and safe maintenance. No more than approximately 6m in total (3m either side of the pipe centreline) has presently been shown to be necessary. If Southern Water seeks anything wider, it must provide pipeline specific engineering evidence and explain why a narrower right, including a width comparable to the drilled section, is not sufficient.	Please refer to the Applicant's response to RR-357-37. Reducing the protective strip further would pose risks to the integrity of the pipeline.
RR-357-39	Landowner engagement	The right itself must also be narrowly drafted. It should not confer unrestricted construction or access powers, prevent ordinary agricultural use outside the defined protection zone, impose wider development sterilisation than technically necessary, or allow interference with drainage and infrastructure without reinstatement and compensation. The landowners reserve all claims for diminution in value, severance, injurious affection, disturbance, crop and trading losses and professional costs.	As detailed within the Statement of Reasons [APP-025], temporary use powers have been sought to allow the Applicant to enter onto land for particular purposes (including site preparation works) in advance of any vesting of land or permanent rights. This enables the Applicant to compulsorily acquire the minimum extent of land and rights required to operate and maintain the project. The Applicant acknowledges that the respondent's land will be impacted by open-cut trenching construction methodology for construction of the pipeline. However, the Applicant confirms that none of the restrictions set out in Schedule 5 to the Draft Development Consent Order [APP-023] will prohibit the respondent from continuing to use the land for ordinary agricultural use once construction is complete. The Applicant confirms that mitigations for interference with drainage and infrastructure can be found within Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). The Applicant confirms that compensation will be paid for any reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss.
RR-357-40	Land use and agriculture	10. Operational, soil and drainage effects 10.1 Grazing and livestock The works could affect roughly 40 acres of grazing land when the working corridor, compound and associated areas are considered. Loss of grazing may force cattle into sheds or require alternative land, additional feed, straw, labour and manure handling. Timing and phasing must be agreed around the farming calendar, with all resulting costs compensated.	The Outline Soil Resources Management Plan (SRMP), provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), highlights the appointment of an Agricultural Liaison Officer (ALO) who will be the primary point of contact for landowners to raise concerns during construction. As set out in paragraph B.2.16 of the Outline SRMP, the roles of the ALO include pre-construction liaison with landowners and the Contractor to minimise disruption to agricultural operations, as well as ensuring landowners, occupiers and their agents are consulted in respect of requirements for field

Reference	Theme	Issue raised	The Applicant's response
			entrances and crossing points across the construction working width, particularly to severed land parcels. In addition, measure LUA3 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) provides for access arrangements across the construction working width, where reasonably practicable, to mitigate temporary field severance.
RR-357-41	Land use and agriculture	10.2 Heavy clay, water meadow and drainage The affected land includes heavy clay, boggy water meadow, steep ground and made ground. Damage to field drainage at the bottom of slopes could affect land well beyond the trench and persist after apparent surface reinstatement.	The Outline Soil Resources Management Plan (SRMP) provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) notes at paragraph B.2.16 that the Agricultural Liaison Officer will be responsible for a number of roles, including the coordination of drainage surveys and keeping landowners informed of pre- and post-construction drainage schemes. Measures WE4 and WE5 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) note that a Construction Drainage Plan will be prepared by the Contractor, which will be informed by baseline drainage surveys undertaken by a specialist drainage contractor, to locate drains and to ensure appropriate reinstatement. The Applicant considers that appropriate measures to protect and/or reinstate agricultural field drains are in effect.
RR-357-42	Land use and agriculture	A farm-specific soil and drainage management plan should be agreed before entry and should include preconstruction drainage surveys, agreed moisture limits for trafficking and soil handling, separate stripping and storage of soil horizons, protection or replacement of drains, decompaction, levels and falls, independent hand-back assessment, multi-year aftercare and responsibility for latent ponding, settlement or drainage failure.	Refer to response RR-357-41. Additionally, the primary purpose of the Outline Soil Resources Management Plan (SRMP) provided at Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), is to protect the soil resources from damage such as compaction, smearing and mixing of incompatible resources. The Outline SRMP includes protocols for determining the suitability of soils to be worked (handled or trafficked), in Tables B-4 and B-5, as well as rainfall criteria at paragraphs B.9.12 and B.9.13. Good practice measures for soil stripping, stockpiling and reinstatement will be further developed in the detailed SRMP, which is secured by Requirement 6 of Schedule 2 to the Draft DCO [APP-023]. The Outline SRMP notes under monitoring requirements at paragraph B.10.5 that site meetings will take place with the landowner following completion of construction works to confirm the land is in a suitable condition to be handed back. Any defects identified and agreed between the landowner, the Agricultural Liaison Officer (ALO) and the Contractor will be ameliorated by the Contractor prior to handing back.
RR-357-43	Landowner engagement	10.3 Soft-fruit production and biosecurity Construction beside an intensive soft-fruit operation presents risks from dust, mud, contaminated material, pests and disease, unauthorised access, interruption to irrigation or electricity, conflict with spraying and harvesting, and interference with retailer and farm-assurance requirements. These matters	Table 5-1 in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) outlines the topic specific environmental measures that are to be adopted during construction to avoid and reduce environmental effects. This includes measures relating to:

Reference	Theme	Issue raised	The Applicant's response
		require a farm-specific construction protocol agreed with the grower, not reliance on a generic environmental management plan.	• AQ1 outlines provisions for the contractor to develop and implement a Dust Management Plan to be approved by the relevant local authority. • LQGC1-11 sets out environmental measures to be taken in respect of contaminated materials, land quality and ground conditions. Paragraph 4.3.1 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) confirms measures will be taken for effective preventative pest and vermin control. The Applicant most recently met with the respondent and their representative on 3 November 2026 to discuss the soft-fruit production and their feedback further.
RR-357-44	Landowner engagement	11. Engagement and voluntary negotiations We participated in the 2024 and 2025 consultations, but material concerns remain unresolved and requested engineering justification has not been supplied. Engagement has too often involved presenting fixed terms rather than working through site-specific alternatives and safeguards.	The Applicant confirms that the respondent's previous comments regarding amending the pipeline route have been considered. The Applicant provided a response to the comments on 16 December 2025. The Applicant has also provided responses to feedback raised by the landowner in the Consultation Report [APP-029] in Appendix F (Statutory Summer 2024 Consultation APP-047) and Appendix G (Statutory Spring 2025 Consultation APP-050). Additionally, following the respondent's feedback from the Summer 2024 Consultation, the pipeline route was realigned to avoid land that received planning permission for the development of additional polytunnels. The Applicant has attempted to ensure parity across all attempts to secure survey access voluntarily in terms of commercial and access provisions. When it has been possible to accommodate, access dates have been changed should site constraints have presented issues to landowners. The Applicant is also seeking consistency and fairness in voluntary agreements sought from landowners for the acquisition of land and rights. The Applicant disagrees with the suggestion that it has presented fixed terms only, however. and confirms it is open to agreeing reasonable provisions within agreements where they can be justified due to existing land uses.
RR-357-45	Landowner engagement	The Pre-application Land and Rights Negotiations Tracker reportedly records only one returned set of Heads of Terms among 172 Category 1 land interests. That snapshot does not by itself prove the reason for non-agreement, but it is inconsistent with meaningful progress towards voluntary settlement on the scale claimed. Our own tracker status should not be recorded merely as negotiations 'ongoing' where Southern Water has not substantively addressed the route, width, mitigation and rights issues set out above.	Whilst the Applicant would prefer to be able to advise the Examining Authority of a higher return of signed Heads of Terms, it does not consider this to be because the terms offered to landowners are unreasonable. To date, despite formally requesting evidence demonstrating why the commercial offer is considered unreasonable on 28 January 2026, the Applicant is yet to receive a response. The Heads of Terms proposed by the Applicant closely align with those adopted across other utilities and infrastructure projects, which have also been reviewed and accepted by respective land agent groups. The Applicant considers that the status recorded by the Applicant in the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1) is correct given that Heads of Terms for a voluntary agreement have been issued and are being discussed with the respondent's

Reference	Theme	Issue raised	The Applicant's response
			representative. The Applicant will continue to engage with the respondent/their representative on the points raised.
RR-357-46	Landowner engagement	The current commercial proposal is understood to offer approximately £8,000 per acre for rights capable of materially restricting land use. We do not accept that this reflects the enduring burden, development constraint, business risk or loss in value. Nothing in this representation constitutes agreement to the Heads of Terms, waiver of statutory compensation or consent to entry or use.	The Applicant has shared the justification for the position on commercial values on a number of occasions with the respondent's representative. The Applicant formally requested evidence demonstrating why the commercial offer is considered unreasonable on 28 January 2026 and wrote to the respondent on 7 May 2026 inviting the respondent to discuss commercial terms offered. The Applicant confirms that to date no response has been received to this invitation or on the commercial values.
RR-357-47	Landowner engagement	Southern Water should provide a dated action schedule identifying each outstanding point, the information to be supplied, the person responsible and the target date for resolution. Negotiations should continue in parallel with examination, with the landowners' reasonable land-agent and legal costs paid.	The Applicant remains committed to working collaboratively with landowners and its clear preference is to secure voluntary agreements for access and the acquisition of land and rights wherever possible. As set out above, the Applicant is yet to receive evidence as to why the commercial offer is unacceptable which the Applicant understands to be the main point of disagreement between the parties. The Applicant welcomes the opportunity to progress voluntary negotiations and has confirmed within the Heads of Terms issued their proposed contribution towards professional fees.
RR-357-48	Landowner engagement	12. Safeguards and amendments required 1. Reinstate the Ford Farm alignment wholly within the water-meadow/cattle-grazing area or provide a transparent comparative justification for refusing it. 2. Reduce the acquisition of permanent rights to the narrowest pipeline protection corridor shown to be essential; no more than approximately 6 m has presently been justified. 3. Remove the 12.64 acres of undefined environmental mitigation or enhancement land from any assumption of project delivery. It is not available without a separate, fully defined voluntary agreement. 4. Redraw the temporary Order Limits around a 20 m target and no more than 24 m for ordinary open-cut construction, subject only to evidenced, site-specific exceptions. 5. Limit rights over drilled sections to necessary subsurface rights and tightly controlled maintenance or emergency access. 6. Relocate the plot 18-018 compound, or provide full geotechnical, contamination, drainage, archaeological and alternatives evidence. 7. Secure continuous HGV, LGV, customer, staff, agricultural and emergency access, including a farm-shop and Ford Farm access plan. 8. Agree farm-specific soil, drainage, livestock, biosecurity and soft-fruit construction protocols before entry. 9. Compensate all land value, severance, injurious affection, disturbance, reinstatement, crop, livestock, trading and professional-cost losses in accordance with the Compensation Code and any voluntary agreement.	Responding to each of the respondent's numbered points directly: 1. Please refer to the Applicant's response to RR-357-24. 2. The Applicant refers to the above response RR-357-37 on the permanent easement width and the approach taken to mitigate the extent of permanent rights acquisition. 3. The Applicant confirms that only the land within plot 18-010 of the DCO is necessary for the deliverability of the Project, as detailed within the Draft Development Consent Order [APP-023]. The Applicant issued Heads of Terms for this land on 3 September 2026. The land within plots 18-011, 18-015 and 18-019 have been identified for additional environmental enhancement which will only be delivered where a voluntary agreement is reached with the respondent. 4. Please refer to the Applicant's response to RR-357-9. 5. Please refer to the Applicant's response to RR-357-23. 6. Please refer to the Applicant's response to RR-357-10 7. Please refer to the Applicant's response to RR-357-43. 8. In line with RR-357-22, the Applicant confirms it wishes to engage on the respondent's site-specific concerns.

Reference	Theme	Issue raised	The Applicant's response
		10. Update the land and rights negotiation tracker so that it accurately records the unresolved position and barriers to agreement.	9. The Applicant confirms that reasonable and mitigated losses incurred by the respondent for temporary or permanent losses will be compensated in line with the compensation code. 10. As outlined in RR-357-45, the Applicant considers the respondent's entry in the Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1) to be correct.
RR-357-49	Landowner engagement	13. Conclusion and reservation The public purpose of the wider project does not remove Southern Water's obligation to justify the precise land and rights it seeks. The present proposals impose avoidable conflict with a planned horticultural expansion, seek an unexplained breadth of permanent and temporary rights, assume undefined mitigation land, expose important farm and retail access to disruption, and defer critical safeguards to later design.	The Applicant notes this comment and refers the respondent to its responses above.
RR-357-50	Landowner engagement	We therefore ask the Examining Authority to treat these matters as principal issues, require Southern Water to answer them during examination, and recommend that the relevant compulsory acquisition and temporary possession powers are refused or modified unless the amendments and protections identified above are secured. We reserve the right to develop these matters in a Written Representation, to provide further plans, business and agricultural evidence, and to participate in any compulsory acquisition or issue-specific hearing. We also reserve all statutory and common-law rights and all claims to compensation.	The Applicant notes this comment.
RR-357-51	Landowner engagement	Application documents referred to 11. Statement of Reasons (document reference 4.1). 12. Pre-application Land and Rights Negotiations Tracker (document reference 4.4). 13. Environmental Statement, Chapter 3 / construction methodology material (document reference 6.1). 14. Land Plans, Book of Reference and Draft Development Consent Order, insofar as they relate to plots 15014, 15-015 and 18-009 to 18-019. 15. Southern Water Spring 2025 Consultation, Design Refinement 18 - The River Hamble and Ford Farm. 16. Planning Act 2008, including section 122, and applicable Government guidance on compulsory acquisition for Development Consent Orders.	The Applicant notes this comment.

Table 2-71 The Applicant's response to RR-359 from William Lacey Group Limited

Reference	Theme	Issue raised	The Applicant's response
RR-359-1	Landowner engagement	We are promoting these sites for housing development on behalf of the landowners.	The Applicant has noted this comment.

RR-359-2	Principle of development	For the continuation of RR-359, please refer to references RR-274-2 to RR-274-25 in table 2-50.	The Applicant notes that the respondent has attached the relevant representation made by Rookesbury Estates Limited (RR-274). The Applicant has provided responses to Rookesbury Estates Limited and the respondent is therefore directed to review this at table 2-50.

Table 2-72 The Applicant's response to RR-360 from Ian Judd and Partners on behalf of William Owton

Reference	Theme	Issue raised	The Applicant's response
RR-360-1	Greeting	Please see supporting email. 1. Key Information Name of Interest party: [REDACTED] Address: The Farm House, Alma Lane, Upham, Southampton SO32 1HE Email Address: [REDACTED]@owtons.com Telephone Number: [REDACTED]	The Applicant notes this comment.
RR-360-2	Landowner engagement	Name & Address of Property Affected: The Farm House, Alma Lane Land Plan Reference No: 21-012- 519 square metres- Acquisition of Rights Linear length of pipe: 0m Use of Land: Domestic Garden and front paddock Land Agent Instructed: Ian Judd and Partners, 4 High Street, Bishops Waltham, Southampton, Hampshire, SO32 1AB - 01489 896422 [REDACTED]@ianjuddandpartners.co.uk	The Applicant notes this comment.
RR-360-3	Location of the proposed pipeline routes	(Map showing area of 'affected land', 'wide hedgerow', 'most appropriate line of pipe')	The Applicant has noted the land highlighted on the figure and the 'most appropriate line of pipe'. The Limits of Deviation for the Pipeline (Work No. 4a) provide flexibility for the Pipeline to be located in the alignment of this line shown on the figure, however land is also required to construct the Pipeline. The gap between the two hedgerows perpendicular to Alma Lane does not provide enough space for construction of the Pipeline, which is why this land is required.
RR-360-4	Principle of development	2. Summary of Submission 2.1. I wish to become an interested party and submit my strongest objection to this Development Consent Order Application.	The Applicant has noted this comment.
RR-360-5	Location of the proposed pipeline routes	2.2. There is no compelling reason to include my land. It would be impractical to remove the mature hedgerow in on my southern and western boundaries to access my land. The obvious route to lay the pipe is straight across Alma Lane, as shown on the sketch plan above.	Please see the Applicant's response to RR-360-3.
RR-360-6	Landowner engagement	2.3. I live at The Farm House, Alma Lane, Southern Water have included 519m2 of my property within their Order Limit to take rights by compulsion.	The Applicant notes this comment.

Reference	Theme	Issue raised	The Applicant's response
RR-360-7	Landowner engagement	3. Need for the land 3.1. We have met with Southern Water Agents at the property, who confirmed it was unlikely this land would be required, however they want to include it 'just in case' it was needed.	The Applicant confirms that the respondents land may be required for the Project and the respondent has been identified as a Category 1 interest within the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1). The respondent can find details on the types of works that may be required on their land on Sheet 21 in the Works Plans [APP-014]. The Applicant attended a site meeting with the landowner and their land agent on the 15 July 2026 where the Applicant explained that the respondent's land is required to be included in the DCO application at this stage as the final pipeline route may impact it once the detailed design has been carried out post-consent. Whilst the DCO application is based on a preliminary design, the detailed design including aspects such as the final pipeline and working width alignment will not be available until a contractor has been appointed by the Applicant following determination of the DCO. The Applicant will confirm to the respondent at this stage whether or not their land will be affected by the final pipeline route and temporary working width. The Applicant issued Heads of Terms to the respondent on 6 March 2026 and will continue to engage despite having been advised that the principle of a voluntary agreement has been rejected by the respondent.
RR-360-8	Landowner engagement	3.2. To obtain compulsory purchase powers, the acquiring authority must have a clear idea of how they intend to use the land which it is proposed to acquire and the land must be required for the development to which the consent relates, or is required to facilitate, or is incidental to, the development,'.	The Applicant has detailed the land and how they intend to use it within Sheet 21 in the Works Plans [APP-014], where the respondent's land is affected by 'Works No. 4 – Pipeline between the WRP site and Otterbourne WSW'. Detail of what is required in Works No. 4 is set out within 'Schedule 1 – Authorised Development' to the Draft Development Consent Order [APP-023]. The land is shown in Sheet 21 of the Land Plans (Document reference 2.2, DCO Volume 2, Version 2) as being subject to the acquisition of rights, the detail of which is set out in Schedule 5 to the Draft Development Consent Order [APP-023]. Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance.
RR-360-9	Landowner engagement	3.3. It is clear that Southern Waters has proposed to take more land than is reasonably required for the purposes of the development. The Secretary of State and Examining Authority need to be provided with Justification as to why compulsory rights are required on this land holding.	Under Section 122 of the Planning Act 2008, a DCO which includes compulsory acquisition powers may be granted only if: • the land is required for the development to which the DCO relates or is required to facilitate or is incidental to the development and/or

Reference	Theme	Issue raised	The Applicant's response
			• there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the DCO. Section 1.6.3 of the Statement of Reasons [APP-025] sets out the factors which the Applicant considers satisfy the conditions in Section 122 of the Planning Act 2008 and the considerations set out in the Compulsory Acquisition Guidance.
RR-360-10	Terrestrial and freshwater biodiversity	3.4. The loss of additional hedgerow is unnecessary and negative for local biodiversity alongside the negative impact on the enjoyment of my home.	The Applicant acknowledges the importance of hedgerows for local biodiversity and the respondent. The hedgerows at this location were subject to survey and the assessment was included in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) with further hedgerow assessment data detailed in ES Appendix 8.2 Habitats [APP-128]. A reduced working width of 20m will be implemented for hedgerow crossings, to minimise impacts on local biodiversity. The reduced working width schedule is provided in the Outline Construction Environmental Management Plan (CEMP; Document reference 7.1, DCO Volume 7, Version 1, APP-413 and APP-414]). The hedgerow loss will be temporary, and reinstatement will be carried out on completion of construction. Details regarding habitat reinstatement are provided in the Outline Landscape and Ecology Management Plan (LEMP) (Document reference 7.5, DCO Volume 7, Version 1).

Table 2-73 The Applicant's response to AS-027 and AS-032 from TB Fowler MRICS on behalf of Mr and Mrs Cross

Reference	Theme	Issue raised	The Applicant's response
AS-027-1	Greeting	Dear Sirs Please could you register Mr B Cross and Mrs J Cross of [REDACTED] as an Interested Party with myself TB Fowler MRICS as their appointed agent. The Cross family are the owners of the Residential freehold land in Title HP747336, which is affected by the Scheme.	The Applicant notes this comment.
AS-027-2	Landowner engagement	Registration Comments: The Residential Landowners have land affected by the Scheme which is their garden/paddock. It is considered un-necessary for the Scheme works to come so close to a residential dwelling, nor through the middle of a village which is surrounded by agricultural land.	The Scheme Development Report [APP-073, APP-074 and APP-075] sets out the process that was undertaken to select the pipeline routes. The Applicant acknowledges that the respondent's land will be affected by open-cut trenching and that a 40m working width will be required where this construction method is used. As set out by the respondent, the land is used for the grazing of horses, and the Applicant understands the concerns raised. The Order Limits are screened from the residential property by a hedgerow boundary and the paddock is located to the North East of the respondent's residential property.

Reference	Theme	Issue raised	The Applicant's response
			The Applicant acknowledges that, during the construction of the Project, the respondent will not be able to use land occupied by the working width but confirms that it will seek to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design once the Applicant can confirm final working areas required. The Applicant confirms that the respondent may be entitled to claim compensation for crop loss and disturbance losses arising out of the temporary use of the land for construction of the project, in line with the compensation code. This could include the buying in of feed throughout the Applicant's temporary occupation of the land due to the respondent's horses being unable to graze the land whilst the pipeline is constructed. The Applicant welcomes further engagement with the respondent in order to explore potential mitigations on the overall temporary impact on the land. The Applicant is keen to continue to engage with the respondent on the difficulties they may encounter during construction activities. The Applicant wishes to add that none of the restrictions set out in Schedule 5 to Draft Development Consent Order [APP-023] will prohibit the respondent from continuing to use the land for the existing equestrian use once construction is complete. Land will be restored to its original condition following the installation of the pipeline in accordance with Outline Soil Resource Management Plan (SRMP) which forms Appendix B of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), and which will be developed further into a detailed SRMP prior to commencement of construction.
AS-027-3	Location of the proposed pipeline routes	Alternative routings should have been considered or should now be being considered. No alternative route has been offered to the Landowners nor has any option to avoid such austere project works been offered by the Applicant to a residential occupier. The Scheme route (40m easement) takes up a significant portion of the garden/paddock, potentially for many years, as per the Plan attached. This is an unreasonable effect on a residential occupier.	The Applicant has considered alternatives in this location. The pipeline route could not be located further south because there are a number of properties along Scivier's Lane which would be affected. Locating the pipeline further north would result in the loss of a greater number of mature trees at field boundaries. The South Downs National Park is also located in close proximity to the north, so any alternative further to the north could have a greater impact on the national park which is afforded a very high level of protection in national planning policy. The Applicant has undertaken an extensive route selection process which has considered a range of environmental, planning and engineering criteria and has had regard to consultation and engagement feedback, as set out in the Scheme Development Report [APP-073 to APP-075]. The maximum working width for trenched open-cut construction of the Pipeline would be 40m, secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) ([APP-413] and [APP-414] for documents 2 and 3). This would provide space for a haul road, construction working areas, storage areas, pipeline trench and soil storage areas.

Reference	Theme	Issue raised	The Applicant's response
AS-027-4	Landowner engagement	Initial Option Agreement terms did not address the disturbance to family life at a residential dwelling, the terms being very 'agricultural' in nature. Revised terms received in August 2026 do not address the practical issues faced by a Residential Landowner who lose a substantial portion of their immediate garden/paddock during Enabling Works and Construction Works.	As detailed within the Consultation Report [APP-029], Statement of Engagement [APP-072] and Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4, Version 1), the Applicant has undertaken engagement with landowners regarding voluntary agreements and has been in discussions with the landowner's representative regarding their comments on the Heads of Terms. As noted by the respondent, since acceptance of the DCO application for Examination, the Applicant has made further amendments to clauses within the proposed Heads of Terms and an improved commercial offer to landowners, further demonstrating reasonable efforts to engage constructively and reach a voluntary agreement. The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use land occupied by the working width but confirms that it will seek to mitigate the impact of the temporary construction works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design once the Applicant can confirm the final working areas required. Compensation provisions have been included within voluntary terms offered to landowners and the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss. The Applicant continues to engage with the respondent and their professional representative to discuss Heads of Terms and an email answering further queries from the respondent was recently sent by the Applicant on the 29 September 2026.
AS-027-5	Landowner engagement	The Terms offered still place on the residential occupier the liability to incur costs and then claim back through a process which is not known to be financially bonded nor explained in a manner that would instil certainty of payment of reasonable costs incurred. It is not proportionate for the Landowners to have to, for example, relocate their pets currently occupying the garden/paddock for many years at a time.	The respondent refers to the compensation provisions that have been included within voluntary terms offered to landowners and the Applicant confirms that compensation will be paid for reasonable and substantiated losses arising as a result of construction works, in accordance with the Compensation Code. The Applicant has confirmed sufficient resources to meet these obligations as set out in the Funding Statement (Document reference 4.2, DCO Volume 4, Version 1). The Applicant will assess compensation on a case-by-case basis, subject to the production of evidence and proof of loss. The Heads of Terms proposed by the Applicant closely align with those adopted across other utilities and infrastructure projects, including the approach to compensation which may arise as a result of the construction works. The Applicant acknowledges that during the construction of the Project, the respondent will not be able to use land occupied by the working width but confirms that it will seek to mitigate the impact of the temporary construction

Reference	Theme	Issue raised	The Applicant's response
			works as far as reasonably practicable. The Applicant confirms that the details of these arrangements are not currently available but will be provided following the detailed design once the Applicant can confirm the final working areas required. The Applicant wishes to add that none of the restrictions set out in Schedule 5 to Draft Development Consent Order [APP-023] will prohibit the respondent from continuing to use the land for the existing equestrian use once construction is complete.
AS-027-6	Landowner engagement	The Landowners will continue to negotiate with Southern Water but expect much more consideration for the specific and practical issues which may be faced by residential occupiers who face major works in their garden.	The Applicant remains willing to discuss voluntary agreements and is continuing to engage with the respondent's representative regarding their feedback and comments on the Heads of Terms. An email answering further queries from the respondent was recently sent by the Applicant on the 29 September 2026.
AS-027-7	Location of the proposed pipelines	The Landowners will continue to press for the route of the pipe to be taken away from their land and village. The Applicant's Land Plans (3 of 3) Sheet 21 of 30, it can be clearly seen that the current routing threads its way between residential dwellings when this is not necessary in such a rural locality.	See response AS-027-3 which explains how the Applicant has considered alternative options in this location.
AS-027-8	The process of developing the Project	The current approach of the Applicant appears to disregard the effects of the Scheme on residential occupiers and is certainly not a 'Consultation' of the route and its impacts.	As set out in the Scheme Development Report [APP-073 to APP-075], the Applicant has made a number of refinements to the design of the Project in response to consultation feedback. However, this has not been possible in all cases, for example where a proposed alternative has the potential to increase environment impacts or unreasonably constrain the delivery of the Project.
AS-027-9	Consultation	I look forward to hearing of your acceptance of this Registration. Yours sincerely	The Applicant notes this comment and has responded to the points in turn.
AS-027-10	The process of developing the Project	Attached plan, resubmitted via AS-032.	See response AS-027-3 which explains how the Applicant has considered alternative options in this location.

References

[1] Southern Water Services Limited, "Developer Services: Stand-off distances to underground apparatus," August 2017. [Online]. Available: https://www.southernwater.co.uk/media/kzof0ba5/stand-off-distances.pdf.

[2] Mayor-Smith, "Reflections on water recycling pilot plant performance," 2024. [Online]. Available: https://www.southernwater.co.uk/media/natd2hg5/pilot-summary-report-uob-final_.pdf.. [Accessed 21 September 2026].


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