Hampshire Water Transfer and Water Recycling Project

The Applicant's responses to Relevant Representations from members of the public and businesses

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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 members of public and businesses 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 theme. Each table includes a unique thematic summary reference, the RR numbers associated with that thematic summary, the summarised issue, and the Applicant's response.

2.2.2 Not all the themes listed in table 3-1 in The Applicant's guide to responses to Relevant Representations (Document reference 8.4, DCO Volume 8, Version 0) have thematic summaries because there were no RRs that specifically referenced these themes or required a detailed response by the Applicant beyond acknowledgement of the comment. Themes that have no summaries include:

- Greeting
- Design principles
- Equality Impact Assessment
- Public Rights of Way

2 The Applicant's responses to members of the public and businesses

Table 2-1 Summary of issues raised on the theme of air quality and odour and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-AQO-01	RR-168, RR-300	Concerns over operational odour arising from the water recycling process at the WRP site, including fumes and gases affecting downwind receptors.	The Applicant understands that concerns have been raised in relation to the potential for odour release from the Water Recycling Plant (WRP) site, and the release of fumes and gases, during operation, particularly in relation receptors downwind from the WRP site. As detailed within Environmental Statement (ES) Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1), the WRP site would utilise and receive wastewater from the existing treatment process at Budds Farm Wastewater Treatment Works. The wastewater entering the WRP site would comprise of highly treated wastewater and would have already been extensively cleaned and treated at Budds Farm WTW. Final treated wastewater entering the WRP site is not anticipated to be odorous and would resemble river water more than wastewater. The recycled water produced by the WRP site would be treated to be appropriate to be held in the natural environment along with spring water in compliance with the abstraction/discharge consents and would therefore be odourless. Effects associated with operational phase odour are therefore considered not significant. As detailed within ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1), additional pollutant sources were also considered for the operational phase of the Project including operational phase vehicle exhaust emissions, operational plant and non-road mobile machinery. In addition, no other fumes or gases are expected to be generated as a result of the operation of the Project. Effects associated with these impacts were found to be not significant.
RR-AQO-02	RR-168	An observation that containment of cleaned water in enclosed storage tanks (as at comparable facilities such as Bundamba Advanced Water Treatment Plant) removes odour as a public nuisance.	The Applicant acknowledges the response in regard to the containment of cleaned water in storage tanks not posing a risk to public nuisance from odour. The wastewater entering the WRP site would comprise highly treated wastewater and would have already been extensively cleaned and treated at Budds Farm Wastewater Treatment Works. Final treated wastewater entering the WRP site is not anticipated to be odorous and would resemble river water more than wastewater. The recycled water produced by the WRP would be treated to be appropriate to be held in the natural environment along with spring water in compliance with the abstraction/discharge consents and therefore be odourless. As such, regardless of whether or not the storage tanks are enclosed, no odour-related issues are anticipated.
RR-AQO-03	RR-168, RR-281, RR-300	Concerns over odour and fume impacts on densely populated residential receptors in Bedhampton, Havant, Portsmouth and Chichester, including cumulative effects alongside the existing Budds Farm WTW.	The Applicant understands that concerns have been raised in relation to the potential for odour and fume release alongside the existing Budds Farm Wastewater Treatment Works (WTW) during the operation of the Project.

Reference	RR references	Summary of issue raised	The Applicant's response
			As detailed within ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1), the WRP site would utilise and receive wastewater from the existing treatment process at Budds Farm WTW. The wastewater entering the WRP site would comprise of highly treated wastewater and would have already been extensively cleaned and treated at Budds Farm WTW. Final treated wastewater entering the WRP site is not anticipated to be odorous and would resemble river water more than wastewater. The recycled water produced by the WRP site would be treated to be appropriate to be held in the natural environment along with spring water in compliance with abstraction/discharge consents and would therefore be odourless. The Project would not involve modifications to the odorous components of Budds Farm WTW and utilises wastewater with minimal odour potential. Therefore, it is not expected to contribute to any odour-related issues during its operation. Effects associated with operational phase odour are therefore considered not significant. The assessment focused on the operation of the WRP and Budds Farm WTW which is in the vicinity of Bedhampton. The recycled water being transferred along the pipeline route to Otterbourne Water Supply Works would be odourless and would have been treated within the WRP to be appropriate to be held in the natural environment along with spring water in compliance with abstraction/discharge consents. Therefore, no impacts relating to odour are expected on densely populated residential areas such as Havant or Portsmouth. The Order Limits are over 4km from the administrative boundary of Chichester and therefore beyond the distance at which odour impacts are expected to occur. As detailed within ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1), additional pollutant sources were also considered for the operational phase of the Project including operational phase vehicle exhaust emissions, operational plant and non-road mobile machinery. Effects associated with these impacts were found to be not significant.
RR-AQO-04	RR-354	Concern over air pollution, odour and dust arising from opening up the landfill during construction of the WRP and associated infrastructure.	The Applicant understands that concerns have been raised in relation to the potential for air pollution, odour and dust release from the WRP site during construction as a result of potential landfill disturbance. In relation to odour during construction, the assessment in ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1), considered an area of worst case risk at the site of the WRP due to the presence of the historic landfill site at this location. A qualitative odour risk assessment has been undertaken within ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1) in accordance with the Institute of Air Quality Management guidance on the assessment of odour for planning. As part of this assessment, receptors downwind of the prevailing wind direction relative to the WRP were considered, including residential dwellings and the adjacent business park. Good practice mitigation measures to control odour were identified as appropriate to the construction activities for the Project, including specific measures at the WRP site in relation to potential disturbance to the historic landfill. These commensurate odour control measures are detailed within the Outline Construction Environmental

Reference	RR references	Summary of issue raised	The Applicant's response
			Management Plan (CEMP) (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) (AQ16 and AQ17). In addition, environmental measures LQGC8 and MAD2, as outlined in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), detail the approach to mitigate the potential increase in ground gas risk from the landfill site during foundation works at the WRP. In relation to air pollution during construction, the Applicant has assessed the potential construction phase road traffic emissions on both human and ecological receptors within ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1). The effects are considered to be not significant in relation to both human and ecological receptors. 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. In relation to dust during construction, the Applicant has assessed potential dust impacts on sensitive receptors 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). 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. 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.

Table 2-2 Summary of issues raised on the theme of alternatives and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-ALT-01	RR-005, RR-011, RR-018, RR-026, RR-028, RR-084, RR-105, RR-106, RR-128, RR-153, RR-206, RR-223, RR-225, RR-234, RR-294, RR-300, RR-321, RR-325, RR-354, RR-355	Concerns that the Applicant has not adequately assessed all reasonable alternatives to the Project before its selection.	All legal and policy requirements in relation to the assessment of alternatives through the DCO process, including the requirements of the EIA Regulations, have been fully met as set out in the Planning Policy Statement (Document reference 5.5, DCO Volume 5, Version 2) from paragraphs 4.3.30 - 4.3.40. Alternatives were considered through both the 2019 Water Resources Management Plan (WRMP19) and the subsequent options appraisal as part of the Regulators' Alliance for Progressing Infrastructure Development (RAPID) process in 2021, noting that whilst pursuing the preferred WRMP19 strategy for a desalination plant at Fawley, the Applicant continued to investigate strategic alternatives as a contingency in case desalination proved undeliverable. Those alternatives were thoroughly assessed through the options appraisal process and the Project was determined to be the best value solution of those considered, following which this became the preferred strategy over desalination. The Applicant's final draft Water Resources Management Plan 2024 (fdWRMP24) confirmed the Project as the selected option for providing the scale of water supply needed in the timescale required representing better value for customers than the next highest-ranking option. The consideration of alternatives through the options appraisal was therefore undertaken well in advance of the Project being selected as the new preferred strategy. Please also refer to the WRMP24 Position Statement [PDA-004] for further information about the role of WRMP24 in respect of optioneering and assessment resulting in the selection of the Project.
RR-ALT-02	RR-018, RR-129, RR-153, RR-294, RR-354	Concerns that alternatives to the Project were not considered at the earliest or formative stage of evolution of the Project, as required by NPS WRI section 3.5 and the EIA Regulations.	Environmental Statement (ES) Chapter 4 Consideration of alternatives [APP-083] is compliant with the requirement under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations) to provide "*a description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects*". Paragraph 3.5.3 of the NPSWRI states "*the consideration of alternatives, as required under the Environmental Impact Assessment Regulations, must begin in the earliest stages of scheme evolution. The starting point should be a review of the optioneering carried out for the regional and water resource management plan development processes".* As noted in the response to RR-AL-01 consideration of alternatives commenced at WRMP19 through to the emerging WRMP24, as informed by the Water Resources South East (WRSE) regional planning process. This represents the very earliest stage of the Project's evolution when a variant of the Project was identified as a strategic alternative to desalination in WRMP19. The Project emerged as the preferred strategic long-term alternative to desalination through the options appraisal process. No alternative solutions to

Reference	RR references	Summary of issue raised	The Applicant's response
			the Project that are available and deliverable in the required timescales to provide the scale of deployable output to meet the required need have been identified in either the WRSE Regional Plan or the Applicant's emerging WRMP24. The Applicant considers that alternative infrastructure options which would not meet the supply need determined by the Applicant's WRMP are not reasonable alternatives to the Project. Following selection of the Project through the options appraisal and WRMP processes, the Project has been refined, and a detailed environmental impact assessment has been carried out in support of the DCO application. Consideration of reasonable alternatives in the context of the iterative design process, in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, is set out within ES Chapter 4 Consideration of Alternatives [APP-083]. Please also refer to the WRMP24 Position Statement [PDA-004] for further information about the role of WRMP24 in respect of optioneering and assessment resulting in the selection of the Project for development.
RR-ALT-03	RR-129, RR-354	Concerns that an alternative environmental buffer (including a bespoke buffer lake along the pipeline route, discharge to the Rivers Hamble or Wallington, and groundwater storage) were not properly assessed before Havant Thicket Reservoir was selected as the receiving environment for recycled water.	The Scheme Development Report [APP-073, APP-074, APP-075] sets out the process undertaken to select the Project, which utilises Havant Thicket Reservoir. This option was selected as integration with Havant Thicket Reservoir provided additional resilience and flexibility, whilst avoiding the need to construct an additional environmental buffer or reservoir between the Water Recycling Plant (WRP) site and Otterbourne Water Supply Works (WSW). An option considered as part of the options appraisal process in 2021 included an environmental buffer lake near Otterbourne (referred to as Option B.5), but this was not preferred over the option to use Havant Thicket Reservoir as an environmental buffer since this would have required additional pipelines connecting the Applicant's Peel Common Wastewater Treatment Works (WTW) to the WRP and required the construction of a new buffer lake. The Scheme Development Report [APP-073, APP-074, APP-075] report on the selection of the Project and why Option B.5 was not progressed due to issues related to deliverability, flexibility, land take, consenting, timescales and carbon. Please also refer to the WRMP24 Position Statement [PDA-004] for further information about the role of WRMP24 in respect of optioneering and assessment resulting in the selection of the Project for development.
RR-ALT-04	RR-129, RR-354	Suggestions that an alternative WRP location using Peel Common WTW (alone or in combination with Portswood) would be closer to demand, have fewer consenting risks and reduce environmental impact on the Solent.	The Applicant's Peel Common WTW is not a suitable location for the WRP since Peel Common WTW does not have the necessary quantity of treated wastewater required for a 60 million litres per day WRP, hence why it is required to be in close proximity to Budds Farm WTW. Locating the WRP at Peel Common WTW would also place it a considerable distance from Havant Thicket Reservoir, increasing the length and costs of interconnecting

Reference	RR references	Summary of issue raised	The Applicant's response
			pipelines. The Applicant considered an option that utilises treated wastewater from Peel Common WTW and Budds Farm WTW (Option B.5), however this option was not progressed following the Applicant's Gate 2 submission as the Project offered greater resilience by using Havant Thicket Reservoir and remains better value with less impacts, as set out in Section 3.9 of the Scheme Development Report [APP-073, APP-074, APP-075]. ES Chapter 4 Consideration of alternatives [APP-083] and the Scheme Development Report [APP-073, APP-074, APP-075] report on the selection of the Project and why Option B.5 was not progressed due to issues which surround deliverability, flexibility, land take, consenting, timescales and carbon. The water quality modelling has demonstrated that adverse environmental impacts are not predicted from release of the reject water into the Solent. Details of the water quality modelling is summarised in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1).
RR-ALT-05	RR-005, RR-026, RR-032, RR-099, RR-110, RR-128, RR-129, RR-130, RR-145, RR-157, RR-212, RR-267, RR-271, RR-281, RR-300, RR-303, RR-318, RR-330, RR-354	Suggestions that new reservoirs and increased winter storage capacity should be developed as a less costly alternative to the Project that would provide a longer lasting legacy.';	New reservoirs have been considered through the Applicant's WRMP process, but these take a significant amount of time to develop and carry their own environmental impacts. Capturing and storing rainfall in reservoirs alone would not provide the necessary volumes of water needed in Hampshire to address the water resources challenge and would need to rely 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. 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 WSW. Using local aquifers for winter storage has previously been considered by the Applicant but carries a number of environmental and feasibility uncertainties and cannot solely deliver on the scale required in the Hampshire supply area. 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 in its Hampshire supply area both in drought and normal conditions. Other solutions have been extensively considered but are not available at the scale needed and in the timescales required. For further information, please see the Scheme Development Report [APP-073, APP-074, APP-075] which report on the selection of the Project.
RR-ALT-06	RR-018, RR-026, RR-129, RR-212, RR-271, RR-281, RR-300, RR-352, RR-354	Suggestions that managed aquifer storage and recharge schemes (including the River Test MAR scheme and other identified confined aquifers across Hampshire, the Isle of Wight and West Sussex) should be prioritised as an alternative to the Project.	Using local aquifers, through both managed aquifer recharge and aquifer storage and recovery, has been considered by the Applicant in its emerging WRMP24, but these require specific geological conditions, require extensive testing and carry a number of environmental and feasibility uncertainties. One such scheme is proposed after 2035 but is only forecast to provide just over 5Ml/d of water into supply and would thus not be able deliver at the scale required to negate the need for the Project.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-ALT-07	RR-018, RR-026, RR-128, RR-129, RR-281, RR-354	Suggestions that moving river abstractions to the tidal limit (including at Woodmill on the River Itchen and at Otterbourne) should be developed as an alternative to protect river ecology and reduce the supply deficit.	The Applicant has looked at moving river abstractions previously, however, this was not considered viable because of a number of environmental and feasibility constraints. There could be potentially significant implications on other water company abstractions and infrastructure, lower reaches of the river would still be subject to abstraction reductions, there would be a likely impact on migratory fish and complications could arise from tidal effects on the duration of abstraction and on water quality. The construction of the necessary abstraction intake, pumping stations and connecting pipelines would also carry their own environmental impacts, and this suggested option does not overcome the sustainability objective of reducing how much water the Applicant takes from the environment.
RR-ALT-08	RR-005, RR-018, RR-032, RR-036, RR-040, RR-084, RR-129, RR-130, RR-153, RR-157, RR-206, RR-210, RR-223, RR-234, RR-235, RR-241, RR-242, RR-249, RR-271, RR-281, RR-300, RR-354, RR-355	Suggestions that increased investment in leakage reduction and mains renewal should be prioritised as an alternative to the Project.	The Applicant recognises the importance of customer education, water efficiency, and leakage reduction in addressing water scarcity. These activities are already under way as part of a wider programme of measures. The Applicant has committed to halving leakage by 2050, supported by targeted mains replacement and advanced detection technologies. Public engagement materials and campaigns are being delivered to raise awareness of water scarcity and promote water-saving behaviours. The Applicant's WRMP19 and emerging WRMP24 selects a range of measures including leakage reductions alongside the need for a new large scale infrastructure solution in its western supply area. The Applicant also offers water efficiency and wastewater management incentives to developers to promote more sustainable practices in new development. These include encouraging the installation of 'water capture' technologies such as greywater recycling and rainwater harvesting and attenuation. Demand management measures form part of the strategy in emerging WRMP24 for addressing the future water supply challenges in the Hampshire supply area, but these measures are only part of the overall solution, which also requires a large new water resource to maintain supplies into the future, due to the scale of the future deficit that the WRMP process is required to plan for.
RR-ALT-09	RR-057, RR-084, RR-153, RR-206, RR-223, RR-234, RR-300, RR-354, RR-355	Suggestions that demand management leakage reduction, mains renewal, customer education, water efficiency measures and metering should be prioritised and pursued as alternatives to the Project.	
RR-ALT-10	RR-036, RR-057, RR-099, RR-242, RR-281, RR-300, RR-352	Suggestions that rainwater harvesting, capture of storm runoff, and use of grey or non-potable water should be developed as alternatives to the Project.	
RR-ALT-11	RR-084, RR-234, RR-250, RR-354, RR-355	Comments on desalination as a reasonable alternative to the Project that should have been comparatively assessed.	The Applicant's WRMP19 established the need for a new strategic water resource solution, in the form of a desalination proposal, 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 WRSE Regional Plan both select the Project as a key

Reference	RR references	Summary of issue raised	The Applicant's response
			component of future water supply in the Hampshire area and wider South East.
RR-ALT-12	RR-354	Concerns over the proposal to tanker water from Norway as a short-term alternative, including cost, environmental risk and deliverability.	After careful consideration and consultation, the Applicant decided to withdraw the proposal to import water from Norway via sea tankers from its emerging WRMP24.
RR-ALT-13	RR-129, RR-234, RR-281, RR-354	Suggestions that a phased approach combining sustainable alternatives on a smaller scale should be pursued in place of a single large infrastructure solution.	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 in its Hampshire supply area both in drought and normal conditions. Other solutions have been extensively considered but are not available at the scale needed and in the timescales required. Smaller scale options for addressing the Applicant's water supply deficit have been considered and adopted through its WRMP process, but these are in addition to the need for a large-scale new water resource. For further information, please see ES Chapter 4 Consideration of alternatives [APP-083] and the Scheme Development Report [APP-073, APP-074, APP-075] which report on the selection of the Project.
RR-ALT-14	RR-018, RR-129, RR-192, RR-234, RR-354	Concerns that alternatives have not been compared consistently in terms of their financial, environmental and carbon impacts over their entire lifespan.	See response to RR-ALT-01 and RR-ALT-02. All options considered through the options appraisal process were robustly assessed against the same criteria to enable a preferred option to be selected. For further information, please see the Scheme Development Report [APP-073, APP-074, APP-075] which reports on the selection of the Project.
RR-ALT-15	RR-018, RR-129, RR-192, RR-354	Concerns that the assessment of alternatives relies on carbon and energy comparisons undertaken at an earlier stage before the Project's capacity and configuration changed.	The options appraisal process undertaken at RAPID Gate 2 comprised a future needs assessment, which considered whether the options could be evolved to meet future resource needs. Once this was confirmed, the remaining options were re-assessed to determine whether increasing the output would change the outcomes of the appraisal. This is set out in Section 3.8 and 3.9 of the Scheme Development Report [APP-073, APP-074, APP-075]. Moreover, the Applicant reviewed its 2021 options appraisal in 2025/26 utilising updated project data and costs, including the increased capacity of the Water Recycling Plant, and this reconfirmed that the Project remains the best value solution against the alternatives considered. This review can be found at Appendix B of the Scheme Development Report [APP-073, APP-074, APP-075].
RR-ALT-16	RR-018, RR-129, RR-192, RR-206, RR-354	Concerns that the options appraisal methodology lacked transparency, with key documents restricted, scoring not visible, and criteria weighted towards larger infrastructure solutions.	See response to RR-ALT-01. The options appraisal process undertaken at Gate 2, which resulted in the selection of the Project, was made publicly available, and was summarised at the Summer 2022 Consultation.
RR-ALT-17	RR-045, RR-072, RR-081, RR-143, RR-241, RR-242, RR-300	Suggestions that Havant Thicket Reservoir should be retained as a spring water resource and alternative sources found for meeting recycled water needs.	The Project is designed to address a critical water supply shortfall in Hampshire helping to protect sensitive chalk stream habitats. Havant Thicket Reservoir is being delivered to enable Portsmouth Water to share water with the Applicant from its network further in the west. If the Project is implemented, recycled water would be pumped into Havant Thicket Reservoir, mixing with spring and rainwater, further strengthening

Reference	RR references	Summary of issue raised	The Applicant's response
			water supply resilience. Havant Thicket Reservoir was always intended to support the water supply deficit in the Applicant's Hampshire supply area. It is, however, insufficient on its own to tackle the scale of water supply deficit facing the area. The Project, through the use of water recycling, would augment the volume of water that can be supplied by Havant Thicket Reservoir alone by over 400%. 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 in its Hampshire supply area both in drought and normal conditions. Other solutions have been extensively considered but are not available at the scale needed and in the timescales required. For further information, please see ES Chapter 4 Consideration of alternatives [APP-083] and the Scheme Development Report [APP-073, APP-074, APP-075] which report on the selection of the Project.
RR-ALT-18	RR-084, RR-355	Suggestions that recycled water should be stored separately and used for non-potable purposes such as forestry or agricultural irrigation, away from the drinking water supply chain.	Non-potable uses of water recycling would not address the projected water supply shortfall in Hampshire. As such, the Project represents a strategic solution to secure resilient water supplies for the long term, taking into account abstraction licence reductions, climate change and a rising population.
RR-ALT-19	RR-036, RR-129, RR-354	Suggestions that delaying delivery would allow technological improvements to make alternative schemes more energy efficient and sustainable.	The Project has been identified through the Applicant's WRMP24 and options appraisal processes as a crucial and urgent part of its strategy to respond to current and future water supply challenges in its Hampshire supply area both in drought and normal conditions. Other solutions have been extensively considered through the options appraisal process but are not available at the scale needed and in the timescales required. Delaying delivery would further increase the risk of water shortages for the Applicant's Hampshire supply area. Further information on the need for the Project is provided in the Case for the Project (Document reference 5.6, DCO Volume 5, Version 1).
RR-ALT-20	RR-018, RR-129, RR-354	Concerns that the proposed capacity of the WRP has been overstated and that a smaller-scale plant combined with alternatives could meet the identified need.	There is no basis for this suggestion. The capacity of the WRP has been carefully determined through the quantity of treated wastewater available as its source, the expected output through the water recycling process, and the quantity of water needed to augment water storage in Havant Thicket Reservoir in order to meet the Applicant's water supply deficit. A new water resource of this scale is required to address the water supply deficit facing the Applicant's Hampshire supply area. Other smaller scale alternatives have been considered through the Applicant's WRMP and will be required in addition to the Project.
RR-ALT-21	RR-147, RR-173, RR-213, RR-260, RR-300, RR-354	Comments that greener, more sustainable and less energy-intensive alternatives are available and should be pursued.	Please refer to the Applicant's response to RR-ALT-19.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-ALT-22	RR-354	Suggestions that the drinking water currently supplied to a large industrial user near Southampton should be diverted to public supply during drought, with an alternative supply (such as a dedicated WRP) provided to the industrial user.	The agreement to supply 10Ml/d to the large industrial user expires in late 2026. That agreement contains an obligation to negotiate a renewal, but the options under consideration for the renewal are not determined and therefore did not provide sufficient certainty for the purposes of inclusion in the emerging WRMP24. The Applicant will continue to explore the possibility of changing the supply to the large industrial user within the options appraisal process for WRMP29. That said, this option would not be capable of providing the scale of water supply needed in the timescales required.
RR-ALT-23	RR-354	Suggestions that groundwater borehole schemes (including at Romsey, Kings Somborne and on the Isle of Wight) should be brought forward as alternatives to the Project.	Groundwater sources in Hampshire already make up a considerable proportion of the water used for public supplies. In planning for future water supplies in the emerging WRMP24, the Applicant is bringing forward two new groundwater schemes, King's Somborne (2.5 Ml/d) and Romsey (4.8 Ml/d). These only deliver a combined 7 Ml/d of water, which falls well short of the quantity of new water required that this Project will deliver. Groundwater sources play an important role, but in delivering new water supplies for the future, they only play a small part in the overall solution. The Environment Agency is pushing to reduce abstractions from rivers and groundwater through the implementation of Environmental Destination. Abstraction from conventional groundwater sources needs to be sufficiently reduced to leave more water available for the environment and protect the unique chalk stream habitats within the water supply area. A number of the Applicant's sources are being investigated as part of on-going Water Industry National Environment Programme (WINEP). Increasing abstractions from current sources, even within the existing licences, is therefore not guaranteed unless WINEP investigations are concluded and show the abstractions to be environmentally sustainable. Abstracting more groundwater is therefore not a viable long-term alternative to the Project.
RR-ALT-24	RR-354	Suggestions that the Applicant should proactively investigate buying or trading private abstraction licences as an alternative source of supply.	The Environment Agency is pushing to reduce abstractions from rivers and groundwater through the implementation of Environmental Destination. Abstraction from conventional groundwater sources needs to be sufficiently reduced to leave more water available for the environment and protect the unique chalk stream habitats within the water supply area. A number of the Applicant's sources are being investigated as part of on-going WINEP. Increasing abstractions from current sources, even within the existing licences, is therefore not guaranteed unless WINEP investigations are concluded and show the abstractions to be environmentally sustainable. Abstracting more groundwater through buying private licences is therefore not a viable long-term alternative to the Project nor will it deliver the scale of new water resource needed in the timescales required.
RR-ALT-25	RR-354	Concerns that the Environmental Statement does not compare the environmental effects of the reasonable alternatives against the Project,	Regulation 14(2)(d) of the EIA Regulations requires that an ES must include *"a description of the reasonable alternatives studied by the applicant, which are relevant to the proposed development and its specific characteristics, and*

Reference	RR references	Summary of issue raised	The Applicant's response
		instead assessing only variants within the already selected option (Option B.4).	*an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment".* Sections 4.2 and 4.3 of ES Chapter 4 Consideration of alternatives [APP-083] provides a summary of the alternative infrastructure options that were considered. This includes all the alternative options that the Applicant considered through the RAPID gated process. The Scheme Development Report [APP-073, APP-074, APP-075] provides further detail on this process. The Project emerged as the preferred strategic alternative long-term solution to desalination through an extensive options appraisal process undertaken as part of the RAPID gated process and was subsequently confirmed as the preferred solution through the WRMP19 Annual Review 2020-21 published in December 2021 and was identified as the preferred solution through the WRSE Regional Plan. The Project is also identified in the Applicant's emerging WRMP24 which sets out the strategy for addressing the water supply deficit in the Western Area up to a 1-in-500 year drought. No alternative solutions to the Project that are available and deliverable in the required timescales to provide the scale of deployable output to meet the required need have been identified in either the WRSE Regional Plan or the Applicant's emerging WRMP24. This is supported by the Environment Agency position in which it has stated that "*through robust optioneering, both through the RAPID gated process and the WRMP process, the Applicant has demonstrated to the Environment Agency's satisfaction that there is a lack of viable alternatives to the Applicant's Project that can meet the necessary scale of water supply needed and in the timeframes required".* ES Chapter 4 Consideration of alternatives [APP-083] therefore only reports on the infrastructure options that were considered to meet the supply need determined by the Applicant's WRMP.
RR-ALT-26	RR-354	Concerns over the continued and extended reliance on the Candover Drought Option and drought permits beyond 2030 pending delivery of the Project, with suggestions that alternative supply schemes should be accelerated instead.	The Applicant is making every effort to deliver the Project at the earliest opportunity in order to support the ecological and environmental objectives that reduced abstractions are required to achieve. Prior to construction starting, timescales are largely dictated by the requirements of the planning process and the need to undertake environmental and technical surveys and investigations, consultation and engagement and development of the Project. The Applicant is continuing to investigate interim measures to reduce its reliance on drought permits and drought orders (including the Candover Drought Scheme) until the Project is delivered and operational, and will report on progress through its annual review of WRMP24 (once published) and through its preparation of WRMP29.
RR-ALT-27	RR-266	Concerns that the previous options appraisal should not be treated as concluding the best-value assessment, and that the preferred solution should be re-tested against the latest costs, risks and environmental information (including Ofwat Gate 4 requirements).	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 in its Hampshire supply area both in drought and normal conditions. Project costs, carbon emissions, environmental impacts and delivering best value for customers have been key factors in the

Reference	RR references	Summary of issue raised	The Applicant's response
			Applicant's assessment and consideration of alternative solutions. Other solutions have been extensively considered but are not available at the scale needed and in the timescales required. The Applicant reviewed its 2021 options appraisal in 2025/26 utilising updated project data and costs, and this reconfirmed that the Project remains the best value solution against the alternatives considered. This review can be found at Appendix B of the Scheme Development Report [APP-073, APP-074, APP-075]. Further information on the need for the Project is provided in the Case for the Project (Document reference 5.6, DCO Volume 5, Version 1).

Table 2-3 Summary of issues raised on the theme of archaeology and cultural heritage and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-ACH-01	RR-204	Requests that pipeline trench excavations are subject to appropriate archaeological investigation, given the prehistoric significance of the area.	Environmental Statement (ES) Chapter 7 Archaeology and cultural heritage [APP-086] assesses the likely significant effects on archaeology and cultural heritage. As outlined in section 7.5.25 of ES Chapter 7 Archaeology and cultural heritage [APP-086], a desk-based historic environmental baseline study was undertaken and is presented as ES Appendix 7.1 Historic environment baseline study [APP-117]. This was followed by two phases of Geophysical Survey and Geoarchaeological Monitoring of Ground Investigation work, along with a scheme of 'Priority Area' trial trenching. The results of this work are detailed in ES Appendix 7.3 Detailed gradiometer survey report - Phase 1 [APP-119] ES Appendix 7.5 Geoarchaeological monitoring report [APP-121], ES Appendix 7.8 Detailed gradiometer survey report – Phase 2 [APP-124], and ES Appendix 7.9 Trial trenching report [APP-125]. These surveys identified that further archaeological investigation will be required to mitigate disturbance of archaeological remains during the construction of the Project. The Applicant is working with the local planning authority Archaeologists and Historic England to agree the Outline Written Scheme of Investigation (Document reference 7.6, DCO Volume 7, Version 1) which sets out the scope and methods of this work to be undertaken by the Contractor. Following ongoing engagement, the Applicant has updated the Outline Written Scheme of Investigation (Document reference 7.6, DCO Volume 7, Version 1) for submission at Deadline 1.
RR-ACH-02	RR-354	Concerns over impacts on Bidbury and Bedhampton Park, including the designated historic conservation area.	The Project does not propose any works within Bidbury and Bedhampton Park (also known as Bidbury Mead). The Project will utilise pipelines that are being delivered by Portsmouth Water between Bedhampton Springs and Havant Thicket Reservoir. Therefore, the Project only proposes Pipelines between the Water Recycling Plant (WRP) site and Bedhampton Springs. These Pipelines pass under the A27 and Mill Lane using trenchless construction. Within the Bedhampton Springs site, above ground pipelines may be used. The effects on Old Bedhampton Conservation Area are assessed in ES Chapter 7 Archaeology and cultural heritage [APP-086]. Further detail on the

Reference	RR references	Summary of issue raised	The Applicant's response
			assessment of the impacts which may result in a change to the setting of Old Bedhampton Conservation Area is presented in ES Appendix 7.7 Heritage assets setting assessment [APP-123]. As detailed in paragraph 7.8.21 of ES Chapter 7 Archaeology and cultural heritage [APP-086], construction of the underground pipeline, compound B1-1 and entry/exit point for the trenchless construction works at Mill Lane directly to the west of Mill Lane within the southern part of the Old Bedhampton Conservation Area would give rise to a temporary moderate adverse (significant) effect reducing on completion of reinstatement works to a minor adverse permanent residual effect (not significant), persisting through operation as a result of visibility of the proposed above ground pipeline at the Old Mill Dam.

Table 2-4 Summary of issues raised on the theme of attitudes towards water recycling and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-WRA-01	RR-169, RR-204, RR-344	Support for the principle of water recycling and willingness to drink recycled water.	The Applicant welcomes support for the principle of water recycling and the willingness expressed by some respondents to drink water that uses recycled water as a source.
RR-WRA-02	RR-002, RR-066, RR-067, RR-098, RR-099, RR-113, RR-117, RR-151, RR-164, RR-172, RR-173, RR-182, RR-202, RR-227, RR-230, RR-262, RR-300, RR-329, RR-335	Objection to, or opposition to, the use of recycled water in the public drinking water supply.	The Applicant recognises the concerns raised about the use of recycled water in public drinking water supply. 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). Under the Project, treated wastewater would undergo advanced multi-barrier treatment before the resultant purified recycled water would be blended with spring water and final treatment to drinking water standards at Otterbourne Water Supply Works, as described in Environmental Statement (ES) Chapter 3 Description of the Proposed Development [APP-082]. The treatment regime, risk assessment, monitoring and operational controls would need to demonstrate compliance with the Water Supply (Water Quality) Regulations 2016 before recycled water could be used as part of public supply. The Applicant will continue to explain the treatment process and regulatory safeguards in clear terms through ongoing engagement.
RR-WRA-03	RR-050, RR-097, RR-145, RR-300	Preference for retaining the existing clean, spring or chalk water source and concerns that water recycling will compromise water purity.	The Applicant recognises that a preference for existing spring or chalk-water sources reflects concern that blending purified recycled water could alter the purity, taste or quality of supply. However, the Applicant has a statutory duty to maintain secure, wholesome and sufficient public water supplies. The need for the Project and its role in the future supply strategy are set out in the Case for the Project (Document reference 5.6, DCO Volume 5, Version 1). The forecast supply deficit means that relying only on existing sources would not provide the resilience or volume required to meet customer demand in both dry years and in normal weather conditions. The Project would not compromise the Applicant's duty to provide wholesome water that is safe and fit for human consumption. Recycled water would be subject to advanced

Reference	RR references	Summary of issue raised	The Applicant's response
			treatment, blending and final treatment before entering supply, with drinking water quality overseen by the DWI and required to comply with The Water Supply (Water Quality) Regulations 2016. This has been confirmed by the DWI in their letter, [PDA-038].
RR-WRA-04	RR-002, RR-113, RR-227, RR-249, RR-300, RR-329	Concerns over health and safety implications of drinking recycled water.	The Applicant recognises the concerns raised about the health and safety implications of drinking recycled water. However, recycled water would only enter public supply where the required treatment, monitoring and regulatory safeguards are in place. The Environment Agency (EA) is the regulatory body responsible for the control of any discharge of potentially polluting substances into the environment that can impact health and safety. The EA issue environmental permits to ensure compliance in line with regulation. The water quality of the output from the water recycling plant will be controlled and managed in accordance with the environmental permit. The Applicant will comply with the conditions of the environmental permit, to ensure that there are no unacceptable impacts to the environment from the discharge of recycled water. Please also refer to RR-WRPR-04 for more information. The Project would use advanced multi-barrier treatment, continuous monitoring, automated operational controls and final treatment at Otterbourne Water Supply Works before water is supplied to customers. Havant Thicket Reservoir is a key element of the Project which provides an environmental buffer, as required by the DWI which is a necessary step in the water recycling process and through supplementing the spring-fed reservoir with recycled water, The Applicant notes the water stored in Havant Thicket is not significantly different from the current water quality profile of water treated at Otterbourne Water Supply Works (Otterbourne WSW) prior to supply. The DWI regulates the water quality of new sources of supply through the requirements placed on the Applicant by the Water Supply (Water Quality) Regulations 2016, including Regulations 15, 27 and 28. These requirements will continue to apply in relation to Havant Thicket Reservoir, including once recycled water is utilised. For further information, please refer to RR-LPP-02 and Appendix D and 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).
RR-WRA-05	RR-009, RR-018, RR-230, RR-281, RR-300, RR-352, RR-354	Concerns that customers will reject tap water and switch to bottled water or home filtration if water recycling proceeds, with associated environmental consequences (plastic waste, carbon, increased abstraction from bottled water sources, and waste-disposal burden on local councils) and socio-economic impacts on vulnerable and low-income households are not considered in the assessment.	The concern that some customers could respond to water recycling by using more bottled water or home filtration is noted. Environmental Statement (ES) Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1) directly considers this issue. It explains that, following customer insight undertaken across the Applicant's region, communities are considered to be broadly accepting of the effectiveness of the technology at population level, although some concerns about drinking water safety and suitability are expected to persist for a minority of people. Where individuals choose not to drink mains supply water, this may result in an additional financial burden from purchasing bottled water. However, as this issue is likely to affect, at most, a small minority of the population, the overall

Reference	RR references	Summary of issue raised	The Applicant's response
			magnitude of impact is assessed as minor. For vulnerable groups, including people with existing health conditions or people on low incomes who may experience financial stress from purchasing water, ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1) assesses this as a minor adverse effect on health and wellbeing, which is not significant. This effect does not relate to a physical health risk, but to a mental health risk associated with a perceived effect. The Applicant will continue to engage with customers and stakeholders to explain how water recycling would produce safe and wholesome drinking water, why it is needed to secure resilient supplies, and how concerns about bottled water use have been considered in the assessment.
RR-WRA-06	RR-012, RR-214, RR-300, RR-354	Concerns over changes to the taste, odour or quality of tap water, with potential to affect customer behaviour and health.	Any change of source can result in slight variations in taste, which is common across the UK whenever water sources are blended or changed. Under the Project, recycled water would be remineralised before blending with spring water and would then receive final treatment at Otterbourne Water Supply Works. The DWI sets strict requirements for safety, taste and odour, and water supplied to customers would remain subject to those requirements regardless of source.
RR-WRA-07	RR-018, RR-084, RR-168, RR-192, RR-249, RR-354	Concerns that adding recycled water into drinking water supplies is unprecedented in the UK and requires Project specific justification, national debate and bespoke regulation.	Water recycling for public water supply is not without precedent. The UK already has a water recycling plant operated by Essex & Suffolk Water at Langford, which opened in 2002. The Langford scheme is an indirect reuse scheme that treats wastewater to augment river flows, with the water then abstracted and treated further for potable supply. The call for a wider national conversation should be considered in the context of the existing national policy and regulatory framework. The EA and DWI have each published positions on water recycling for public water supply, recognising that it can form part of the future supply mix where schemes are properly planned, assessed, permitted and regulated. Water recycling has also been identified through the current round of Water Resources Management Plans (WRMPs) as one response to future supply shortfalls, particularly in water-stressed areas of the South East and East of England. The Project is one of the schemes being advanced in that context and has been subject to scheme-specific consultation and assessment. This national context does not remove the need for project-specific scrutiny. For the Project, consultation has included engagement on the matters raised in this representation, including water quality, public health, treatment safeguards and the efficacy of water recycling as a means of addressing future water supply shortfalls. The DWI has confirmed that recycled water can be used where water companies demonstrate robust risk assessment, advanced multi-barrier treatment, continuous monitoring and compliance with The Water Supply (Water Quality) Regulations 2016. Water supplied to customers would therefore continue to be required to meet the same statutory standards for safety, taste and quality as any other drinking water source.

Reference	RR references	Summary of issue raised	The Applicant's response
			It is not the role of the DCO to speculate about how such substances will be regulated in the future. The Applicant will comply with the conditions of the environmental permit, ensuring that the recycled water does not cause harm to the environment. For further information about how the environmental permitting process will operate in relation to the Project, please 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).
RR-WRA-08	RR-168, RR-300	Concerns that international water recycling precedents (Australia, California, USA) are not comparable to the proposed Project as they are not certified for public drinking water consumption or are located in different countries.	International examples are not relied on as a substitute for UK-specific assessment or regulation. They are relevant because they demonstrate that water recycling, including potable reuse, is an established technology when supported by appropriate treatment, monitoring and regulatory controls. The Applicant acknowledges that schemes in Australia, California and elsewhere operate under different legal and regulatory frameworks. The acceptability of the Project will therefore be determined by the UK regulatory and consenting framework, not by international precedent alone. The DWI has confirmed that water recycling can be delivered safely where companies demonstrate robust risk assessment, advanced multi-barrier treatment, continuous monitoring and compliance with The Water Supply (Water Quality) Regulations 2016. Water supplied to customers would therefore need to meet the same statutory standards for safety, taste and quality as any other public water supply source.
RR-WRA-09	RR-078	Observation that water is naturally cyclic and that public objections to recycling are based on suspicion rather than science.	The Applicant notes the observation that water is naturally cyclical and that attitudes to recycling should be informed by evidence. Public trust is essential to the successful development and delivery of the Project. As such the Applicant will continue to engage openly on water recycling, following best practice by explaining the need for the Project, the treatment process, the regulatory safeguards and how water quality and safety would be monitored and assured.
RR-WRA-10	RR-018, RR-354	Concerns that this fundamental change in drinking water source from natural aquifers and rivers to recycled water may not be regulated as a 'new source' by the Drinking Water Inspectorate, and that the regulatory framework has gaps.	Regulation 15 of The Water Supply (Water Quality) Regulations 2016 sets specific sampling requirements for a source that has not previously been used for public water supply or has not been used for the preceding six months. Its purpose is to establish whether water from that source can be supplied as wholesome water and what treatment is necessary before it is introduced into supply. The issue raised is therefore whether the Project would be treated as a new source for the purposes of Regulation 15 and, if so, whether those source-specific sampling and assessment requirements would apply. The application of Regulation 15 is a matter for the DWI, as the relevant regulator, to determine having regard to the operation of the Project and the applicable regulatory framework. The Applicant will comply with the regulatory requirements that apply to the Project, including the requirements of The Water Supply (Water Quality) Regulations 2016 and any DWI expectations arising from its assessment of the Project. In addition, the discharge, abstraction and operation of the water recycling process would be subject to environmental regulation, including the relevant Environment Agency

Reference	RR references	Summary of issue raised	The Applicant's response
			permitting and abstraction controls. The Project would therefore not proceed outside the regulatory framework; it would be subject to drinking water quality regulation, environmental permitting, and the detailed design, operational and monitoring controls required before recycled water could be used as part of public water supply.
RR-WRA-11	RR-255, RR-300, RR-354	Concerns that the Applicant's poor record on pollution incidents and maintenance means public confidence is low and that they cannot be trusted to safely deliver water recycling.	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. The Applicant also has a strong record on drinking water quality performance. In 2025, it achieved 99.98% compliance with the standards in The Water Supply (Water Quality) Regulations 2016 for over 225,000 tests on treated water carried out at treatment works, service reservoirs and consumer properties. This is above the industry compliance record for the same year of 99.97%. 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.
RR-WRA-12	RR-169, RR-300	Comments that recycling treated wastewater to near-drinking quality only to be used for drinking is illogical, and that recycled water would be better suited to industrial or non-potable uses.	The treatment process is outlined in RR-WRA-02. The Applicant notes the suggestion that recycled water should be used for non-potable or industrial purposes rather than public water supply. The DWI has confirmed that water recycling can be delivered safely where companies demonstrate robust risk assessment, advanced multi-barrier treatment, continuous monitoring and compliance with the Water Supply (Water Quality) Regulations 2016. Water supplied to customers would therefore need to meet the same statutory standards for safety, taste and quality as any other public water supply source. The Project has been identified through the WRMP process because it is needed to address a forecast public water supply deficit in Hampshire and the wider South East. Non-potable reuse can have a role in some circumstances, but it would not, on its own, provide the volume, location or resilience benefits required to meet the identified supply need. The need for the Project is set out in Case for the Project (Document reference 5.6, DCO Volume 5, Version 1), and the options appraisal is set out in Scheme Development Report [APP-073] to [APP-075].

Reference	RR references	Summary of issue raised	The Applicant's response
			Please refer to RR-WRPR-04 for details for how the recycled water and, later, drinking water quality is regulated. Please also refer to RR-WRPR-03 for details of the efficacy of water recycling.
RR-WRA-13	RR-300	Objections that the Project will contaminate or pollute clean spring water from Bedhampton Springs with treated wastewater.	The Applicant does not accept that the Project would contaminate or pollute clean spring water or Havant Thicket Reservoir. Under the Project, advanced-treated recycled water would be blended with spring water from Bedhampton Springs, before being introduced to Havant Thicket Reservoir. It would not be discharged untreated or allowed to bypass the water recycling process. The potential effects of introducing this blend of recycled water and spring water into Havant Thicket Reservoir have been assessed through reservoir water quality modelling, including consideration of reservoir mixing, nutrient concentrations, dissolved oxygen, algal biomass, metals and downstream releases. The assessment concludes that, with the proposed treatment and operational controls, the Project would not result in unacceptable deterioration of water quality in Havant Thicket Reservoir or in receiving watercourses downstream. Relevant assessment material includes ES Chapter 19 Water environment (Document reference 6.1, Volume 6, Version 1) and ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, Volume 6, Version 1).
RR-WRA-14	RR-300	Concern over impacts of recycled water on local wildlife and aquatic species.	Potential effects on local wildlife and aquatic species have been assessed in the Environmental Impact Assessment (EIA) and reported in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, Volume 6, Version 1) and ES Chapter 9 Marine biodiversity (Document reference 6.1, Volume 6, Version 1). These assessments consider Havant Thicket Reservoir, downstream watercourses, chalk stream receptors, freshwater habitats and species, and the potential introduction or spread of invasive non-native species. These assessments consider the operational effects of introducing recycled water to Havant Thicket Reservoir and associated water-quality changes in downstream watercourses. They also consider the beneficial effects on the River Test and River Itchen chalk streams arising from reduced abstraction, together with construction effects on freshwater habitats and species and the potential introduction or spread of invasive non-native species. The assessment concludes that, with the proposed treatment, monitoring and operational controls, the Project would not result in significant adverse effects on aquatic ecological receptors. Water quality modelling indicates that Havant Thicket Reservoir would continue to support aquatic ecology, and downstream modelling predicts minor improvements in water quality in Riders Lane Stream and Hermitage Stream. Construction-related risks would be managed through standard and species-specific mitigation, including appropriate crossing methods, pollution prevention and ecological supervision.

Reference	RR references	Summary of issue raised	The Applicant's response
			Further information is provided in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, Volume 6, Version 1), ES Chapter 9 Marine biodiversity (Document reference 6.1, Volume 6, Version 1) and ES Appendix 19.11 Havant Thicket Reservoir water quality modelling [APP-206].
RR-WRA-15	RR-354	Concern that approval of this Project will set a precedent for further water recycling schemes across the country	Approval of this Project would not set aside the requirement for any future water recycling scheme to be justified, assessed, consented, permitted and regulated on its own merits. The Project is one of four water recycling schemes being advanced by the Applicant, one of 12 across England and one of seven major schemes identified in the current round of WRMPs, with most of these focused in the water stressed South East and East of England regions. The DWI has confirmed that water recycling can be delivered safely, outlining the robust regulatory requirements that water companies must demonstrate before recycled water can be put into supply. Please refer to the letter from the Drinking Water Inspectorate [PDA-038].
RR-WRA-16	RR-354	Concerns that Reverse Osmosis is not an established treatment process for effluent recycling at this scale in the UK and brings risks around public acceptance, market confidence, taste, and reputational damage.	Reverse osmosis is an established advanced treatment process internationally and forms part of a multi-barrier treatment approach, rather than operating as a single safeguard. Under the Project, reverse osmosis would be combined with other treatment, remineralisation, blending and final treatment before water entered public supply, as described in ES Chapter 3 Description of the Proposed Development [APP-082]. The process would be designed, tested, commissioned and operated to meet regulatory requirements, including DWI expectations for risk assessment, monitoring and compliance with statutory drinking water standards.
RR-WRA-17	RR-250	Reference to the Environment Agency position statement on wastewater recycling and the Drinking Water Inspectorate report as useful evidence.	The Applicant notes the reference to the Environment Agency position statement and DWI material on water recycling. These sources are relevant because they confirm that water recycling can form part of public water supply where schemes are properly planned, risk assessed, permitted, regulated and monitored. The Project has been developed in that context and would be required to comply with the applicable drinking water quality, environmental permitting and operational controls before recycled water could be used as part of public supply.
RR-WRA-18	RR-300	Objections on grounds that customers should not pay for, or be forced to accept, recycled water as drinking water.	The Project has been identified through the Applicant's WRMP and options appraisal processes to address a forecast public water supply deficit and to support the Applicant's statutory duty to maintain secure, wholesome and sufficient supplies. Relying only on existing sources would not provide the resilience or volume required to meet future demand. The need for the Project is set out in Case for the Project (Document reference 5.6, DCO Volume 5, Version 1). The acceptability of recycled water will be determined by the UK regulatory framework. The DWI has confirmed that water recycling can be delivered safely where companies demonstrate robust risk assessment, advanced multi-barrier treatment, continuous monitoring and compliance with the Water Supply (Water Quality) Regulations 2016. Water supplied to customers would therefore need to meet the same statutory

Reference	RR references	Summary of issue raised	The Applicant's response
			standards for safety, taste and quality as any other public water supply source.
RR-WRA-19	RR-300	Suggestion that the Applicant should trial drinking the recycled water themselves.	Water recycling is expected to become an increasingly important part of the future water supply mix, both for the Applicant and for other water companies responding to water scarcity, population growth and environmental pressures on existing sources. As further schemes are developed, a growing number of customers across the country are therefore likely to receive drinking water that includes recycled water (including the Applicant), whether as one component of a blended supply or, in some circumstances, as a more substantial part of the source water. Against that wider context, confidence in water recycling depends on demonstrating that each scheme can operate safely and consistently within the statutory drinking water framework. The Applicant has conducted extensive trials through its water recycling pilot plant with experts from the University of Brighton. Testing has included analysis of pharmaceuticals and personal care products, pesticides, trace organic contaminants, including Per- and Polyfluoroalkyl Substances (PFAS), and volatile organic compounds. Data from the 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, would continue to meet the strict water quality standards required by the DWI.

Table 2-5 Summary of issues raised on the theme of carbon and climate change and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-CCC-01	RR-003, RR-018, RR-036, RR-040, RR-049, RR-072, RR-073, RR-107, RR-129, RR-130, RR-157, RR-210, RR-225, RR-235, RR-242, RR-249, RR-271, RR-281, RR-300, RR-321, RR-331, RR-354, RR-355	Concerns over the high operational energy demand of the energy-intensive reverse osmosis treatment and the pumping of water over long distances, operating 365 days a year.	Operational energy consumption of the Project has been quantified within the Project's whole-life carbon assessment and identified in section 4.2 of the Outline Carbon Management Plan (Outline CMP) [APP-423]. Over the 100-year whole-life appraisal, energy is estimated to represent a relatively small portion of the Project's whole-life operational carbon (2.2%). In order to manage carbon emissions, the Applicant has prepared the Outline CMP [APP-423] document which is secured under the Development Consent Order (DCO). The document establishes the strategic objective of reducing greenhouse gas emissions to as low as reasonably practicable (ALARP) as well as an assessment criterion for ALARP. This helps ensure that opportunities to reduce carbon emissions continue to be identified, evaluated and implemented as the Project progresses through detailed design, construction and operation. The Applicant and Contractor will use these criteria to determine whether identified mitigation measures are practicable and feasible to implement, with measures that satisfy the criteria incorporated into the Project to support reducing carbon emissions to ALARP.
RR-CCC-02	RR-003, RR-036, RR-049, RR-129,	Concerns over the high construction carbon footprint and greenhouse gas emissions associated with building the Project's infrastructure.	Construction emissions were assessed as part of the whole-life carbon assessment presented in section 10.8 of Environmental Statement (ES) Chapter 10 Carbon and climate change [APP-089].

Reference	RR references	Summary of issue raised	The Applicant's response
	RR-264, RR-281, RR-326, RR-354		The Applicant incorporated carbon reduction measures throughout the design process and selected a project configuration that was identified as a lower-carbon solution compared with other feasible alternatives considered through the Regulators' Alliance for Progressing Infrastructure Development (RAPID) options appraisal process. ES Chapter 10 Carbon and climate change [APP-089] concluded that construction emissions would represent approximately 0.007% and 0.003% of the Fifth and Sixth Carbon Budgets respectively and would not materially affect the UK's ability to meet its carbon reduction commitments. Accordingly, the construction carbon effect was assessed as minor adverse and not significant in Environmental Impact Assessment (EIA) terms. The Applicant's Outline CMP [APP-423] establishes the strategic objective of reducing greenhouse gas emissions to as low as reasonably practicable (ALARP). It identifies construction activities, materials and supply chain emissions as key carbon hotspots, and establishes a framework through which opportunities to reduce emissions will continue to be identified, evaluated and implemented as the Project progresses through detailed design and construction. The Outline CMP [APP-423], which is a secured document under the DCO, sets out the Project's strategic carbon objective and ALARP assessment criteria, which secures that opportunities to reduce carbon emissions continue to be identified, evaluated and implemented as the Project progresses through detailed design, construction and operation. The Applicant and Contractor will use these criteria to determine whether identified mitigation measures are practicable and feasible to implement, with measures that satisfy these criteria incorporated into the Project to support reducing carbon emissions to ALARP.
RR-CCC-03	RR-018, RR-129, RR-354	Concerns over the magnitude of whole-life operational greenhouse gas emissions, including the reliance on a 100-year operational life assumption when the design life is stated as 60 years.	The assessment of operational phase carbon emissions is presented in section 10.8 of ES Chapter 10 Carbon and climate change [APP-089] and the Outline CMP [APP-423] and was undertaken using a whole-life carbon methodology in accordance with the PAS 2080:2023 Carbon Management in Buildings and Infrastructure and relevant UK Water Industry Research guidance. The assessment considered a 100-year operational period because the Project is expected to provide water resource benefits over the long term and infrastructure components that reach the end of their design life would be maintained, refurbished or replaced to enable continued operation. Consistent with the RAPID whole-life carbon guidance, replacement carbon was calculated using recognised asset life categories, with a precautionary assumption that replacement activities generate the same carbon emissions as the original installation. The Applicant therefore considers that the 100-year assessment period provides an appropriate basis for assessing the Project's whole-life carbon impacts and is consistent with the long-term purpose and operation of the Project.

Reference	RR references	Summary of issue raised	The Applicant's response
			In order to manage carbon emissions, the Applicant has prepared the Outline CMP [APP-423] document which is secured under the DCO. The document establishes the strategic objective of reducing greenhouse gas emissions to ALARP as well as an assessment criterion for ALARP, providing a framework through which opportunities to reduce carbon emissions will continue to be identified, evaluated and implemented as the Project progresses through detailed design, construction and operation. The Applicant and Contractor will use these criteria to determine whether identified mitigation measures are practicable and feasible to implement, with measures that satisfy the criteria incorporated into the Project to support reducing carbon emissions to ALARP. The Applicant acknowledges the respondent's comments regarding the long-term operational lifespan of the Project and the replacement requirements associated with components such as reverse osmosis membranes. The Water Recycling Plant (WRP) has an overall design life of approximately 60 years, which is consistent with major water infrastructure assets. The WRP comprises a range of assets with differing design lives. Major civil infrastructure, such as tunnel shafts, chambers and manholes, is designed to last up to 100 years, while buildings are designed for approximately 60 years. Process equipment would be routinely renewed throughout the life of the facility to maintain safe, efficient and reliable operation. The WRP will be designed to allow mechanical, electrical and control components to be replaced without diminishing the routine operation, performance or capacity of the facility. The need to replace individual components over time does not reduce the overall design life of the WRP but ensures that the facility continues to provide long-term water supply resilience and operational benefits throughout its intended lifespan. The design basis has also considered provision for changes in treatment requirements over the design life of the WRP to support the long-term operation of the asset. The pipelines will have a design life of approximately 100 years and their condition will be monitored and checked throughout operation. Isolation valves and washout valves, contained within accessible below-ground chambers, will be installed along the Pipeline route to facilitate maintenance and repair, as described in ES Chapter 3 Description of the Proposed Development [APP-082].
RR-CCC-04	RR-129, RR-214, RR-354	Concerns over the transparency and robustness of the carbon assessment for treatment chemicals, including powdered lime and carbon dioxide used for remineralisation, and whether transport, production and worst-case chemical demand have been fully captured.	Operational greenhouse gas emissions associated with treatment chemicals have been quantified within the whole-life carbon assessment and are included within the operational carbon baseline presented in ES Chapter 10 Carbon and climate change [APP-089] and the Outline CMP [APP-423]. This includes powdered lime and carbon dioxide, together with other treatment chemicals required for operation of the Project. The assessment accounts for emissions associated with both chemical manufacture and transport using the UK Water Industry Research (UKWIR) Carbon Accounting Workbook v18.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-CCC-05	RR-129, RR-354	Concerns that the operational carbon assessment uses mean flows rather than a reasonable worst-case drought flow of 90 Ml/d.	The operational carbon assessment methodology is described in ES Appendix 10.1 Carbon assessment methodology [APP-147]. The assessment was undertaken using mean "Full Period" operational flows, incorporating both normal operating conditions and drought conditions over the operational life of the Project. The methodology states that the use of mean "Full Period" flows was considered a reasonable likely worst-case approach for the carbon assessment. The Project has been designed to meet water resource needs during both normal operation and drought events, including extreme drought scenarios. However, operation at drought transfer rates would occur only during limited periods and would not be representative of long-term annual operation. Consequently, using continuous operation at a maximum drought flow rate of 90Ml/d throughout the Project life would not provide a realistic estimate of whole-life operational emissions.
RR-CCC-06	RR-129, RR-354	Concerns that emissions from pumping and pipeline transfers, from opening up the Broadmarsh landfill, and from induced operation at connected works have not been fully captured in the assessment.	The whole life carbon assessment includes operational greenhouse gas emissions associated with the Project, including those arising from pumping and pipeline transfers required to convey water through the scheme, together with emissions associated with treatment processes and operation of the proposed assets. These sources are reflected within the operational carbon assessment presented in section 10.8 of ES Chapter 10 Carbon and climate change [APP-089]. The Applicant understands the concern to relate to the potential for additional methane emissions arising from the degradation of landfill material following reopening of the Broadmarsh landfill. Methane emissions associated with the reopening of the Broadmarsh landfill are not included within the carbon assessment. Upon review of 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), it was found that the risk of methane emissions from landfill is very low and is not expected to be influenced by the construction or operation of the Project. Therefore, no fugitive emissions from landfill have been included in the carbon assessment. Section 10.5 of ES Chapter 10 Carbon and climate change [APP-089] considers the principles established by the Finch judgment, the potential for indirect emission sources and whether causal pathways exist between the Project and additional indirect carbon emission sources. The Applicant identified that there will be some minor connection works that link the Project to existing infrastructure operated by the Applicant. Potential emissions from these minor connection works, as well as utility connections have been accounted for in the assessment through the inclusion of an uncertainty factor, as outlined in ES Appendix 10.1 Carbon assessment methodology [APP-147]. There were no other activities at connected works as a result of the Project that were considered likely to result in additional emissions.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-CCC-07	RR-354	Concern that the carbon assessment excludes fugitive methane emissions from the former Broadmarsh landfill, and that excavation, disturbance and exposure of waste during construction could alter gas-generation or release pathways.	Methane emissions associated with the reopening of the Broadmarsh landfill are not currently included within the assessment. Upon review of 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), it was found that the landfill is currently uncapped and the risk of increased methane emissions from landfill is very low and is not expected to be influenced by the construction or operation of the Project. Therefore, no fugitive emissions from landfill have been included in the carbon assessment.
RR-CCC-08	RR-354	Concern over potential off-site carbon and energy impacts at Farlington WTW arising from Portsmouth Water using reservoir water that includes recycled effluent.	The water recycling element of the Project will be required to meet stringent water quality permit requirements before transfer to the reservoir. The water received at Havant Thicket Reservoir from the Project will be of a comparable quality to other sources, and emissions from treating the water are provided in the assessment detailed in ES Chapter 10 Carbon and climate change [APP-089]. Therefore, no additional emissions have been identified due to the use of this recycled water.
RR-CCC-09	RR-018, RR-192, RR-354	Concerns over the omission from the Environmental Statement of the indirect greenhouse gas effects of a predictable consumer shift from tap water to bottled drinking water and associated packaging emissions.	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, 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. Please also refer to the Applicant's responses to RR-277-34, RR-277-35, RR-277-37 and RR-277-38 in relation to the quality of recycled water. The Project would supply combined spring and recycled water to the Applicant's customers following storage in Havant Thicket Reservoir and final treatment at Otterbourne Water Supply Works (Otterbourne WSW). Portsmouth Water customers are only anticipated to receive water from Havant Thicket Reservoir through separate bulk supply arrangements in prolonged dry weather or emergency conditions. The Applicant does not anticipate an increase in bottled water use where recycled water is treated, monitored and regulated as proposed, and therefore not included in the carbon baseline.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-CCC-10	RR-018, RR-354	Comments on the relevance of the Supreme Court's decision in R (Finch) v Surrey County Council to the assessment of indirect greenhouse gas effects of the Project.	Section 10.5 of ES Chapter 10 Carbon and climate change [APP-089] considers the principles established by the Finch judgment, the potential for indirect emission sources and whether causal pathways exist between the Project and additional indirect carbon emission sources. Two potential indirect pathways were identified and considered in the assessment, as set out below: 1. Emissions arising from additional infrastructure developments, in connection with the Project. 2. Emissions associated with upgrades to existing infrastructure, in connection with the Project. The Applicant has identified that there will be some minor connection works that link the Project to existing infrastructure operated by the Applicant. Potential emissions from these minor connection works, as well as utility connections have been accounted for in the assessment through the inclusion of an uncertainty factor, as outlined in ES Appendix 10.1 Carbon assessment methodology [APP-147]. Activities required to update existing infrastructure, in connection with the Project were anticipated to be minor, such as upgrades to utility connections, increased fencing and security measures and new masts. The Applicant did not identify any other indirect pathways such as downstream carbon emissions from the consumption of water made available by the Project. No causal connection can be made from the provision of water sources specifically made available by the Project to any further activities associated with the use and consumption of that resource. No causal connections can also be made as to how water from the Project would be used, included with it could be distributed for residential, commercial or industrial purposes. For further information, please refer to section 10.5 of ES Chapter 10 Carbon and climate change [APP-089]. Indirect carbon effects associated with the Project have therefore been considered, and the Applicant's assessment is fully compliant and robust with applicable guidance such as the Institute of Sustainability and Environment Professional (ISEP) guidance 'Assessing Greenhouse Gas Emissions and Evaluating their Significance', and with relevance to the Finch judgement.
RR-CCC-11	RR-018, RR-129, RR-354	Concerns that the Outline Carbon Management Plan commits only to emissions being 'as low as reasonably practicable', with no baseline, quantified reduction target, monitoring or reporting mechanism, and cannot be secured or enforced through the DCO.	The Applicant notes that the commitment to reduce emissions to a level that is ALARP reflects the stage of development of the Project and the delivery model through which it will be implemented and is consistent with the requirement in paragraph 4.4.16 of the NPSWRI to ensure that greenhouse gas emissions are as low as reasonably practicable. Regarding the following points: 1. Baseline: The whole-life carbon assessment has been undertaken as a worst-case scenario estimate based on the outline design submitted as part of the DCO application and provides a baseline against which future carbon performance can be assessed.

Reference	RR references	Summary of issue raised	The Applicant's response
			2. Monitoring and reporting: The Outline CMP [APP-423] sets out a defined schedule for updating the CMP to inform the progress against the Project's carbon reduction objectives and delivery of commitments made under the ALARP. Updates are required at the completion of Contractor tender process, following completion of construction before start of the operational phase of the Project, and annually thereafter. 3. Carbon reduction target: The Applicant acknowledges that no reduction targets have been stated within the Outline CMP. This is intentional and is intended to drive ongoing performance based on the latest opportunities identified as the design of the Project develops. The Outline CMP [APP-423] and ALARP commitment ensure that mitigation measures continue to be reviewed regularly at future stages of development rather than carbon reduction activity stopping once an initial target has been achieved. The Contractor will be responsible for developing the detailed design, construction and operation of the Project. As the design matures, further opportunities for carbon reduction and optimisation are expected to be identified, with progress reporting secured through the Contractor arrangements and the DCO through the Outline CMP [APP-423]. The Applicant therefore considers that it would be inappropriate to set a fixed carbon reduction target at this stage against an outline design that is intended to evolve. 4. Enforceability: The Outline CMP [APP-423] secured through the DCO, sets out an ALARP strategic objective for carbon and clear assessment criteria. This provides an enforceable mechanism for continual carbon reduction throughout project development and delivery, rather than constraining the Project to a predetermined reduction target established prior to detailed design. The Applicant does not agree that the absence of a quantified reduction target renders the Outline CMP ineffective or unenforceable. Rather, the Outline CMP provides a legally binding framework through which carbon reduction opportunities will continue to be identified, assessed and implemented as the Project progresses.
RR-CCC-12	RR-018, RR-129, RR-354	Suggestions that the whole-life carbon assessment be examined as a Principal Issue and that a quantified carbon budget, mitigation targets and reporting obligations be secured as requirements in the DCO.	Please refer to the Applicant's response to RR-CCC-11. The Applicant notes that the commitment to reduce emissions to a level that is ALARP reflects the stage of development of the Project and the delivery model through which it will be implemented and is consistent with the requirement in paragraph 4.4.16 of the NPSWRI to ensure that greenhouse gas emissions are as low as reasonably practicable. Regarding the following points: 1. Baseline: The whole-life carbon assessment has been undertaken as a worst-case scenario estimate based on the outline design submitted as part of the DCO application and provides a baseline against which future carbon performance can be assessed. 2. Monitoring and reporting: The Outline CMP [APP-423] sets out a defined schedule for updating the CMP to inform the progress against the Project's

Reference	RR references	Summary of issue raised	The Applicant's response
			carbon reduction objectives and delivery of commitments made under the ALARP. Updates are required at the completion of contractor tender process, following completion of construction before start of the operational phase of the Project, and annually thereafter. 3. Carbon reduction target: The Applicant acknowledges that no reduction targets have been stated within the Outline CMP [APP-423]. This is intentional and is intended to drive ongoing performance based on the latest opportunities identified as the design of the Project develops. The Outline CMP [APP-423] and ALARP commitment ensure that mitigation measures continue to be reviewed regularly at future stages of development rather than carbon reduction activity stopping once an initial target has been achieved. The Contractor will be responsible for developing the detailed design, construction and operation of the Project. As the design matures, further opportunities for carbon reduction and optimisation are expected to be identified, with progress reporting secured through the Contractor arrangements and the DCO through the Outline CMP [APP-423]. The Applicant therefore considers that it would be inappropriate to set a fixed carbon reduction target at this stage against an outline design that is intended to evolve. 4. Enforceability: The Outline CMP [APP-423] secured through the DCO, sets out an ALARP strategic objective for carbon and clear assessment criteria. This provides an enforceable mechanism for continual carbon reduction throughout project development and delivery, rather than constraining the Project to a predetermined reduction target established prior to detailed design. The Applicant does not agree that the absence of a quantified reduction target renders the Outline CMP [APP-423] ineffective or unenforceable. Rather, the Outline CMP [APP-423] provides a legally binding framework through which carbon reduction opportunities will continue to be identified, assessed and implemented as the Project progresses.
RR-CCC-13	RR-354	Concern that the alternatives carbon comparison relies on outdated Gate 2 estimates from 2021, before the Water Recycling Plant capacity increased from 15 Ml/d to 60 Ml/d.	Gate 2 Options Appraisal Process Review within the Scheme Development Report - 2 of 3 documents [APP-074] considers the increase in carbon impacts since Gate 2. It explains that the mean and maximum flows assessed for the current scheme are higher than those assumed at Gate 2 and that the scheme is now expected to operate as a business-as-usual asset in normal years, rather than primarily during drought conditions. The updated assessment therefore reflects the higher throughput and utilisation associated with the revised operating scenario, alongside changes in project requirements. Notwithstanding this increase, the assessment estimates the Back Up Option's whole-life carbon emissions to be approximately 19% higher than the Selected Option. The assessment therefore demonstrates that, under the updated assumptions, the Selected Option continues to perform better in carbon terms than the Back Up Option.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-CCC-14	RR-036, RR-040, RR-210, RR-235, RR-249, RR-281, RR-331, RR-354	Concerns that the Project's high energy and carbon intensity conflicts with local and national carbon reduction goals, the water industry's commitment to operational carbon neutrality by 2030, and UK net zero targets.	The Applicant notes that the Project has been selected through the Applicant's Water Resources Management Plan (WRMP) as a necessary component of a resilient future water supply for the region. A range of alternative options were developed, assessed and compared in the WRMP to identify a best value plan capable of meeting long-term water supply needs while balancing environmental, resilience, social and economic considerations. Section 10.8 of ES Chapter 10 Carbon and climate change [APP-089] demonstrates that the Project will not lead to a significant increase in greenhouse gas emissions. With primary and tertiary mitigation in place, estimated emissions during the construction phase would constitute approximately 0.007% and 0.003% of the Fifth and Sixth Carbon Budgets respectively, and operational emissions would constitute approximately 0.004% and 0.008% of the Sixth and Seventh Carbon Budgets respectively. These conclusions adopt a conservative approach and do not take into account any further secondary mitigation that may be adopted in future. Therefore, carbon emissions released during the construction, operational and decommissioning phases of the Project are considered to have a minor adverse (not significant) effect, which would not have a material impact on the UK being able to meet its emission reduction targets. In addition, the Applicant's Outline CMP [APP-423] secured through the DCO, sets out an ALARP strategic objective for carbon and clear assessment criteria, through which opportunities to reduce emissions will continue to be identified, evaluated and implemented as the Project progresses through detailed design and construction. Measures that satisfy these criteria will be implemented to reduce carbon emissions to ALARP.
RR-CCC-15	RR-129, RR-354	Concerns that the Applicant's carbon calculation depends heavily on assumed future decarbonisation of the national grid rather than selecting a lower energy solution or on-site generation.	Power consumption is responsible for 2.2% of the whole-life operational carbon, as set out in the Outline CMP [APP-423]. This baseline calculation utilises the Department for Energy Security and Net Zero (DESNZ) Green Book supplementary guidance: valuation of energy use and greenhouse gas emissions for appraisal, which assumes the grid decarbonises over time. Whilst projected changes in grid carbon intensity are reflected within the assessment in line with the Green Book supplementary guidance, the Applicant is also committed to reducing operational energy demand and has embedded this as a requirement for the future Contractor to demonstrate its review and implementation of associated mitigation measures. The Outline CMP establishes the Project's approach to managing construction and operational carbon emissions and is aligned with the principles of PAS 2080. Renewable energy opportunities, including opportunities for on-site generation, have been considered during the development of the Project. The Applicant's approach to renewable energy is set out in Section 5.3 of the Outline CMP [APP-423]. There are insufficient viable generation opportunities available within the DCO limits to provide meaningful and efficient renewable energy contribution to the Project power demand. The Applicant considers

Reference	RR references	Summary of issue raised	The Applicant's response
			that decisions relating to renewable energy generation and low-carbon energy supply are most effectively considered through its wider energy management strategy. This enables renewable energy generation and procurement opportunities to be assessed across the broader asset portfolio, allowing investment to be directed towards solutions that deliver the greatest long-term cost and carbon reduction benefit. The Applicant therefore considers that a strategic, portfolio-based approach is better placed to secure reliable, scalable and resilient low-carbon energy supplies than project-specific renewable installations alone. The Applicant will be responsible for supplying metered electricity to the appointed Contractor. This creates a natural commercial incentive for the Contractor to identify and implement energy-efficient design solutions from the outset, reducing operational energy consumption and associated costs over the life of the Project. Any such energy efficiency improvements have not been relied upon in the whole-life carbon assessment and would therefore represent additional carbon reductions beyond those already included in the assessment. The Outline CMP [APP-423] establishes a strategic carbon objective to reduce carbon emissions to ALARP, together with defined assessment criteria. This framework is designed to drive ongoing management and reduction of greenhouse gas emissions throughout Project development and operation. The Applicant therefore considers that the Project does not rely heavily on future grid decarbonisation and that opportunities to reduce operational energy demand and associated greenhouse gas emissions will continue to be pursued throughout the Project lifecycle.
RR-CCC-16	RR-354	Concern over the transparency and completeness of published energy consumption figures, including the absence of a combined total, a peak (drought) figure, and a WRP specific kWh/m³ figure.	The Project's estimated operational power consumption is presented in ES Appendix 10.1 Carbon assessment methodology [APP-147] for the mean "Full Period" flows. The results are reported separately for the WRP to Bedhampton Springs transfer and the Bedhampton Springs to Otterbourne Water Supply Works (Otterbourne WSW) transfer. The "Full Period" flow represents the average flow across the assessment period, incorporating both normal operating conditions and periods of drought, and is therefore considered a reasonable basis for assessing operational energy demand.
RR-CCC-17	RR-128, RR-129, RR-354	Concerns that the Project's large and continuous electricity demand could constrain grid capacity and prevent future housing, employment and other growth in the Havant and Bedhampton area.	The Applicant does not consider that the Project will constrain grid capacity or prevent future housing, employment or economic growth within the Havant and Bedhampton area. Electricity network planning and reinforcement are managed by National Grid and the local distribution network operators in accordance with their statutory and regulatory obligations. Furthermore, the Project is intended to support planned population and economic growth within the region by providing resilient water infrastructure to accommodate future development. Further information on the socio-economic benefits of the Project is provided in ES Chapter 17 Socio-economics, tourism and health [APP-096].

Reference	RR references	Summary of issue raised	The Applicant's response
RR-CCC-18	RR-210, RR-331, RR-346, RR-354	Concerns that the high operational energy costs will be passed on to customers through inflated water bills, including costs of carbon offsetting or alternative energy sources.	The Outline CMP [APP-423], which is secured through the DCO, establishes a strategic objective to reduce greenhouse gas emissions to ALARP and sets out the criteria against which carbon reduction opportunities are assessed. One of the key means of reducing operational carbon emissions is through the incorporation of energy-efficient design that reduces electricity demand. This not only reduces operational greenhouse gas emissions but can also help manage operational energy costs over the lifetime of the Project. Any large-scale solutions addressing the scale of the water supply shortfall facing Hampshire are likely to have a substantial cost, particularly when compared to the historic practice of river and groundwater abstractions. Providing a new source of water to offset the reductions in abstractions from the environment will inevitably require more energy for the associated processes (e.g. water recycling, desalination) and/or pumping requirements (e.g. water transfers). The Project was selected as the preferred solution from an extensive options appraisal process. Project costs, carbon emissions, energy usage, environmental impacts and delivering best value for customers have been key factors in the Applicant's assessment and consideration of alternative solutions. The Project has also been selected through both Water Resources South East (WRSE) and the Applicant's WRMP24 processes, with best value as a golden thread through each. As with all 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-CCC-19	RR-225	General concern over the climate impacts of the Project.	Construction, operation and decommissioning emissions were assessed as part of the whole-life carbon assessment presented in section 10.8 of ES Chapter 10 Carbon and climate change [APP-089]. The significance conclusions presented in this chapter of the ES were derived using the framework from the Institute of Sustainability and Environmental Professionals guidance: Assessing Greenhouse Gas Emissions and Evaluating their Significance, and by having regard to relevant policy requirements, including paragraph 4.4 of the National Policy Statement for Water Resources Infrastructure (NPSWRI). The assessment concluded that the Project's emissions would not materially affect the UK's ability to meet its carbon budgets or net zero commitments. Construction emissions represent approximately 0.007% and 0.003% of the Fifth and Sixth Carbon Budgets respectively, while operational emissions represent approximately 0.004% and 0.008% of the Sixth and Seventh Carbon Budgets respectively. A high-level assessment of decommissioning emissions was undertaken, noting that specific methods for decommissioning are uncertain at present. In addition, there is currently no carbon budget established for the period when decommissioning of the Project would occur.

Reference	RR references	Summary of issue raised	The Applicant's response
			The estimated decommissioning emissions were 110 tonnes of CO_2e, with a high degree of uncertainty, acknowledging that the emissions are expected to be short-term and a single occurrence. The assessment also includes embedded mitigation measures and is supported by the Outline CMP [APP-423], which establishes a process for identifying, evaluating and implementing further carbon reduction measures during procurement, detailed design, construction and operation. These potential additional measures are not relied upon to reach the assessment conclusions and therefore provide additional opportunities for future carbon reductions. Therefore, the Applicant considers that the Project complies with paragraph 4.4.15 of the NPSWRI, as the increase in greenhouse gas emissions resulting from the Project is not of a scale that would have a material impact on the Government's ability to meet its greenhouse gas reduction obligations and commitments, including net zero and the statutory carbon budgets. The Project also complies with paragraph 4.4.16 of the NPSWRI, as greenhouse gas emissions have been reduced as low as reasonably practicable through the embedded strategic carbon objective and assessment criteria for carbon mitigation measures within the Outline CMP [APP-423], which is secured under the DCO. The effectiveness and proportionality of these measures have been considered in the context of the scale of the Project's emissions, which are not considered significant in the context of national carbon reduction targets and commitments. The Applicant considers this to be the most appropriate approach for the Project because responsibility for detailed design, construction and operation will transfer to the Contractor through the Direct Procurement for Customers (DPC) model. Rather than prescribing specific carbon reduction measures at the DCO stage, the Outline CMP [APP-423] establishes a framework that requires the Contractor to identify, evaluate and implement carbon reduction opportunities across the key emissions sources throughout the design, construction and operational phases. This approach ensures that carbon reduction remains embedded within decision-making while providing the flexibility needed to take advantage of future innovation, evolving technologies and supply chain expertise as the design develops.
RR-CCC-20	RR-018, RR-354	Comments on the Applicant's conclusion that construction and operational carbon effects are minor adverse and not significant in EIA terms, and whether this adequately addresses the availability of lower-energy alternatives, the adequacy of mitigation and potential exceedance of modelled demand.	The significance conclusions presented in ES Chapter 10 Carbon and Climate Change [APP-089] were derived using the framework from the Institute of Sustainability and Environmental Professionals guidance: Assessing Greenhouse Gas Emissions and Evaluating their Significance, and by having regard to relevant policy requirements, including paragraph 4.4 of the National Policy Statement for Water Resources Infrastructure (NPSWRI). The assessment concluded that the Project's emissions would not materially affect the UK's ability to meet its carbon budgets or net zero commitments. Construction emissions represent approximately 0.007% and 0.003% of the Fifth and Sixth Carbon Budgets respectively, while operational emissions represent approximately 0.004% and 0.008% of the Sixth and Seventh Carbon Budgets respectively. Therefore, the Applicant considers that the

Reference	RR references	Summary of issue raised	The Applicant's response
			Project complies with paragraph 4.4.15 of the NPSWRI, as the increase in greenhouse gas emissions resulting from the Project is not of a scale that would have a material impact on the Government's ability to meet its greenhouse gas reduction obligations and commitments, including net zero and the statutory carbon budgets. The Project also complies with paragraph 4.4.16 of the NPSWRI, as greenhouse gas emissions have been reduced as low as reasonably practicable through the embedded strategic carbon objective and assessment criteria for carbon mitigation measures within the Outline CMP [APP-423], which is secured under the DCO. The effectiveness and proportionality of these measures have been considered in the context of the scale of the Project's emissions, which are not considered significant in the context of national carbon reduction targets and commitments. The Applicant has considered alternatives through the RAPID options appraisal process. The selected Project configuration was identified as a lower-carbon option than several other feasible alternatives capable of meeting the water resource need, including desalination and larger water recycling schemes. The assessment also includes embedded mitigation measures and is supported by the Outline CMP [APP-423], which establishes a process for identifying, evaluating and implementing further carbon reduction measures during procurement, detailed design, construction and operation. These potential additional measures are not relied upon to reach the assessment conclusions and therefore provide additional opportunities for future carbon reductions. The operational assessment has been undertaken using a precautionary whole-life carbon methodology and includes conservative assumptions regarding future chemical-related emissions. The Applicant therefore considers that the assessment provides a robust basis for concluding that construction and operational carbon effects would be minor adverse and not significant in Environmental Impact Assessment (EIA) terms.
RR-CCC-21	RR-354	Concerns that topographical constraints along the pipeline route will require either increased construction depth or additional pumping, adding to the Project's energy and carbon costs.	Topography and hydraulic performance have been important considerations in the development of the pipeline route and transfer system. The pipeline route has been developed through an iterative options appraisal and route selection process, with alternative routes and pipeline corridors evaluated and progressively refined in response to engineering, environmental and other constraints. The Scheme Development Report [APP-073 to APP-075 – 3 documents] describes how the initial pipeline routes identified through the options appraisal were developed into pipeline corridor sections and evaluated to identify a preferred pipeline corridor, allowing the route to be refined in response to more localised constraints. The hydraulic design has also been developed having regard to the local topography and the pumping requirements of the transfer system. Hydraulic studies have considered the pipeline route and configuration, pipe friction losses and pipeline diameter, together with opportunities to optimise the hydraulic configuration.

Reference	RR references	Summary of issue raised	The Applicant's response
			Accordingly, the design response is not simply to accommodate topographical constraints through increased pipeline depth or additional pumping. The route and hydraulic configuration have been developed together to achieve a viable transfer system and will be further refined by the Contractor during the detailed design within the parameters of the DCO at a later stage. The greenhouse gas assessment and Outline CMP [APP-423] have been developed using the best available information at the current stage of design development and provide a robust baseline for understanding and managing the Project's expected greenhouse gas emissions. The Outline CMP [APP-423] establishes a strategic objective for greenhouse gas emissions to be reduced to ALARP, which will apply to future design decisions, including any refinements required in response to topographical constraints. Any changes that could increase energy consumption or greenhouse gas emissions will therefore be considered through the Project's carbon management process, and opportunities to avoid, reduce or mitigate those impacts will be identified and implemented where reasonably practicable. The Applicant therefore considers that the Project has established an appropriate framework to manage potential changes arising through detailed design while continuing to pursue reductions in operational energy demand and associated greenhouse gas emissions.

Table 2-6 Summary of issues raised on the theme of construction compound location and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-CCL-01	RR-358	Objections to the use of the field adjacent to Highbridge near Eastleigh as a construction compound.	This construction compound (Construction compound L-10) would support trenchless construction under the River Itchen. 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. 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.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-CCL-02	RR-358	Suggestion that equipment and plant be accommodated in nearby yards at Highbridge Farm commercial area as an alternative construction compound location.	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.

Table 2-7 Summary of issues raised on the theme of construction impacts and effects and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-CIE-01	RR-040, RR-065, RR-128, RR-129, RR-223, RR-281, RR-300, RR-354	Concerns over disruption to local communities during construction, including residents in the Havant area, Rowlands Castle and surrounding villages. A suggestion that more mitigation is needed.	Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091] assesses the effects of the Project on local communities, including the Havant area. The assessment considers the in-combination effects of the Project on amenity for residential properties, community land and facilities, and commercial land and property, drawing on the findings of other assessments, including 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]. Residents in the Havant area, Rowlands Castle and surrounding villages were consulted as part of the Summer 2024 Consultation. The Applicant produced a Preliminary Environmental Information Report (PEI Report) and consulted on initial proposals for mitigation of the Project. The Applicant has had regard to the feedback received, as reported in the Consultation Report [APP-029]. Within Havant area, the following components of the Project will be constructed: • The Water Recycling Plant (WRP) • The Pipeline from Budds Farm Waste Treatment Works (WTW), an existing facility, to the WRP. • The Pipeline from the WRP to Bedhampton Springs, an existing facility. • The Pipeline from the WRP towards Otterbourne Water Supply Works (WSW) an existing facility, as it heads east from the WRP for approximately the first 3.5km. The Project will use pipelines between Bedhampton Springs and Havant Thicket Reservoir, together with Havant Thicket Reservoir, both of which are being delivered separately by Portsmouth Water. Accordingly, these elements do not give rise to construction effects associated with the Project. Rowlands Castle and the surrounding villages are approximately 5km from the nearest construction works and no effects have been identified. **Construction of the WRP** Minor adverse effects, which are not significant, are predicted for residents, community land and facilities, specifically Broadmarsh Coastal Park and Storehouse Lake Angling Association, and commercial property and land.

Reference	RR references	Summary of issue raised	The Applicant's response
			Construction of the pipeline from Budds Farm WTW to the WRP Minor adverse effects, which are not significant, are predicted for residents. There are no relevant receptors for community land and facilities or commercial property and land, as the Pipeline would be underground. **Construction of the pipeline from the WRP to Bedhampton Springs** No effects are predicted because construction of the Project in this area would not require the temporary or permanent loss of any community land and facilities or commercial property and land, nor would it affect access to or boundary features of residential property, community land and facilities or commercial property and land. **Construction of the Pipeline from the WRP to Break Pressure Tank and Intermediate Pumping Station E (BPT/IPS-E)** Residential properties could be impacted temporarily by multiple road or land closures, resulting in a minor adverse effect. Relevant closures include Mill Lane, Widley Walk and B2177 Southwick Road. In addition, residential areas around Widley and Drayton could experience effects as a result of the temporary, short-term lane closure on the B2177 Portsdown Hill Road to facilitate the construction of a temporary access for construction compound E-1. The duration of proposed closures would vary depending on the construction activity undertaken in each location. In most cases, the closures would involve short-term overnight closures. The coordination of road closures proposed in proximity to each other, including in the area north of the B2177 Portsdown Hill Road, is detailed in the Traffic Management Strategy [APP-416]. This would result in a minor adverse effect, which is not significant. It is not anticipated that the construction of the Pipeline between the WRP site and Otterbourne WSW would result in any significant in-combination effects on amenity for residential receptors, with at most a minor adverse effect. Mitigation measures to limit the effects of construction are set out in the Outline Construction Environmental 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) and will be further developed through detailed management plans prepared by the Contractor post-consent, including but not limited to, a Noise and Vibration Management Plan, a Stakeholder and Customer Communications Plan and a Dust Management Plan.
RR-CIE-02	RR-223, RR-354	Concern over road excavation, conflicts with other utility services along the pipeline route, and the potential need for temporary shutdown of services to residents and businesses.	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. A Traffic Management Strategy (TMS) [APP-416] has also been prepared and details all locations where the pipeline crosses a public highway and whether open cut or trenchless crossing techniques are proposed. As detailed within the Traffic Management Strategy, trenchless crossing techniques are proposed at all routes that would be considered important at a national or

Reference	RR references	Summary of issue raised	The Applicant's response
			regional level, and the majority of roads used by bus services. For those more minor roads where open cut techniques are proposed, traffic signals are proposed where feasible or alternative routes have been identified. The Applicant has identified the statutory utilities and other organisations whose assets may be impacted 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 Development Consent Order (DCO) [APP-023] will ensure that any assets are adequately protected during the construction of the Project. 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) specifies that the Contractor's community relations personnel shall notify affected communities and other relevant stakeholders prior to the commencement of potentially disruptive construction activities. This will enable those affected to plan ahead and reduce uncertainty, including through alignment with the actions set out in the Equality Impact Assessment Action Plan, in Appendix A of the Equality Impact Assessment (Document reference 7.13, DCO Volume 7, Version 1). Therefore, where temporary shutdown of services may be required communities will be consulted in advance.
RR-CIE-03	RR-354	Concern over the complexity of construction at specific crossings, including conflicts with the electricity sub-station at the New Road and Bedhampton Road crossing to Park Lane, and the Hermitage Stream crossing.	The complexity of construction at the specific crossings referenced are as follows: **Electricity substation (New Road)** The Project is not due to interact with the New Road, with the nearest proposed construction being approximately 270m from the junction between New Road and Bedhampton Road. Planned infrastructure around this area includes the construction of pipelines between Bedhampton Springs and Havant Thicket Reservoir, which are being delivered by Portsmouth Water. **Bedhampton Road/Park Lane** The nearest point of Park Lane is approximately 390m from the nearest proposed construction associated with the Project. Planned infrastructure around this area includes the construction of pipelines between Bedhampton Springs and Havant Thicket Reservoir, which are being delivered by Portsmouth Water. **Hermitage Stream** The Hermitage Stream is due to be crossed by the pipeline between Budds Farm Wastewater Treatment Works (WTW) and the WRP. This section of the Pipeline is due to be constructed using trenchless construction methods, as set out in Table A-2 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). This construction method has been selected, in part, to avoid or reduce impacts on third-party infrastructure and thereby reduce construction complexity.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-CIE-04	RR-028	Concern over the reliability of controls for settlement and construction risks.	LQGC15 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) specifies that contractors are to ensure that construction activities are to be undertaken so that impacts on surrounding structures, property and buried services are reduced where practicable. LQGC15 further specifies that ground movement assessments and predictions, informed by the post-consent detailed design, will be used to inform the Contractor's Safe System of Work. The Contractor will establish the potential construction-induced ground movements affecting receptors within the predicted zone of influence and will implement good practice measures, including monitoring before, during and after the works, to avoid or reduce impacts from settlement and sub-surface movement during construction. Ground movement monitoring during the works will be compared against the design predictions, with trigger levels and associated actions defined within the detailed CEMP(s) and the Contractor's method statements and specifications. Construction risks will be mitigated through the Contractor's compliance with the Construction (Design and Management) Regulations 2015. This will support health and safety during construction through appropriate planning of works, appointment of suitably competent personnel, cooperation and coordination, effective communication of risks and engagement with workers on risk management.
RR-CIE-05	RR-128, RR-129	Concerns over the potential harmful effects of pipeline washouts and requests for independent expert assessment of washout likelihood and the feasibility of tankering away discharged water.	The potential effects of pipeline washouts have been assessed within ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1). The assessment assumes that washout discharges associated with testing, commissioning and routine maintenance activities are managed in a controlled manner, with washout water collected and removed for appropriate disposal. Emergency releases are exceptional events and have been assessed within ES Chapter 14 Major accidents and disasters [APP-093]. Mitigation and operational controls are secured through WE15 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and the Operational Environmental Management Plan [APP-422]. On this basis, the Applicant considers that the potential effects of washout activities, together with the proposed management and disposal arrangements, have been appropriately assessed within the DCO application and that no further independent assessment is required.
RR-CIE-06	RR-129, RR-354	Suggestions that trenchless construction be used, and secured through the DCO, where the pipeline crosses sensitive ecological features, such as wildlife corridors and hedgerows.	Trenchless techniques have been considered and are used at a number of locations, having regard to environmental receptors and engineering constraints as detailed in Table A-2 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).

Reference	RR references	Summary of issue raised	The Applicant's response
			The Scheme Development Report [APP-073 to APP-075 - 3 documents] highlights how the environment was considered in the route selection process. Where linear features of greater environmental sensitivity were identified, trenchless crossings were identified to avoid or reduce potential 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) also identifies locations where reduced working widths will be used to limit habitat loss and vegetation removal, with specific working-width reductions set out in Appendix A. ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) provides a detailed impact assessment on terrestrial and freshwater biodiversity, including ancient woodland. A range of measures have been embedded within the Project design to avoid or reduce environmental effects. With mitigation in place, no residual likely significant adverse effects on ecological features are anticipated. Primary mitigation measures include a minimum of 15m exclusion zone from any construction works to designated ancient woodland habitat, together with measures to avoid the loss or deterioration of ancient and veteran trees, as 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).
RR-CIE-07	RR-210	Concern over the adequacy of standardised trench plugs (clay stanks) to account for hydrodynamic pressures unique to the Stroudwood Lane valley contours.	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 through the DCO, will manage the effects of construction. Detailed CEMPs will be produced by the Contractor and submitted for approval in accordance with the corresponding requirement in Schedule 2 to the draft DCO [APP-023]. This includes preparation of a Construction Drainage Plan to manage the quality and quantity of construction stage drainage. Measures required to be included in the Construction Drainage Plan are set out in WE4 and WE5 within Table 5-1 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 located drains and prepare 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 and will include measures to minimise water within the working area and ensure ongoing drainage of surrounding land. A detailed Water Monitoring Plan will be developed by the Contractor 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 Water Monitoring Plan will be produced and submitted for approval in accordance with the corresponding requirement in Schedule 2 to the draft DCO [APP-023] and will be based on ES Appendix 19.9 Outline Water Monitoring Plan [APP-204]. The strategy includes long-term groundwater monitoring in key areas, from installation to post-construction, to establish seasonal variability in

Reference	RR references	Summary of issue raised	The Applicant's response
			groundwater levels and monitor groundwater fluctuations before, during and after construction.
RR-CIE-08	RR-129, RR-223	Concern over the lack of clear mitigation plans for construction disruption.	The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) sets out how the Project will avoid, reduce and mitigate effects on the environment during construction. During construction, the Contractor will adhere to all legislative and regulatory requirements at the time. The control measures included in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) are designed to achieve regulatory compliance as a minimum and, where relevant, to accord with good practice and mitigate or control environmental effects. Detailed CEMP(s) will be prepared by the Contractor post-consent and submitted for approval in accordance with the corresponding requirement in Schedule 2 to the draft DCO [APP-023] and will include site-specific construction methodologies, risk assessments and management plans. 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 concluded that construction of the Pipeline is not anticipated to result in any significant in-combination effects on amenity for residential receptors, with at most a minor adverse effect.
RR-CIE-09	RR-281, RR-354	Concerns over the scale of construction works, including the Water Recycling Plant, pumping stations, shafts, kilometres of pipelines and materials used.	The Project has been identified as the Strategic Resource Option to address the water resources need in the region through the Applicant's Water Resources Management Plan (WRMP). The Project is required to address increasing water scarcity in the face of climate change, population growth and the need to reduce abstractions from Hampshire's precious chalk streams. The project selection process is set out in the Scheme Development Report [APP-073 to APP-075 - 3 documents] and ES Chapter 4 Consideration of alternatives [APP-083]. Despite the scale of the Project, mitigation measures have been identified to avoid or reduce construction effects. These 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) and further highlighted in the Environmental Statement chapters.
RR-CIE-10	RR-354	A statement agreeing that construction works in multiple areas along the pipeline routes may be particularly challenging.	The Applicant acknowledges the statement. The Applicant will continue to refine the design of the Pipeline within the parameters set out in the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) and wider DCO documentation. This will be supported by further pre-construction surveys and investigations that will inform the detailed design. Despite the potential challenging areas of the Project, mitigation measures have been identified 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 further highlighted in the ES chapters.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-CIE-11	RR-331	Concerns over the risk of irreversible environmental damage arising from pipeline construction failures, drilling fluid frac-out or rupture at high-risk infrastructure crossings including the River Itchen SAC.	ES Chapter 14 Major accidents and disasters [APP-093] sets out the assessment and description of the expected significant adverse effects on the environment arising from the vulnerability of the Project to risks of relevant major accidents and disasters. Table 14-5 of ES Chapter 14 Major accidents and disasters [APP-093] provides a summary of the scope of the assessment. The elements scoped out, as agreed in the Environmental Impact Assessment (EIA) Scoping Opinion, are confirmed in ES Appendix 5.3 Response to EIA Scoping Opinion [APP-106]. Risks from pipeline construction failures are highlighted and mitigated as follows: • Activities within the scope of health and safety legislation were agreed in the EIA Scoping Opinion to be scoped out of the assessment. • Construction risks associated with system failures and flooding during construction were agreed to be scoped out of the assessment, subject to demonstration of relevant mitigation being secured. ES Appendix 5.5 Commitments Register (Document reference 6.2, DCO Volume 6, Version 1) lists the relevant mitigation measures and confirms how they will be secured through the DCO. • Drilling fluid frac-out is covered by the construction risks associated with system failures and flooding during construction, which were agreed to be scoped out of the assessment subject to relevant mitigation being secured. ES Appendix 5.5 Commitments Register (Document reference 6.2, DCO Volume 6, Version 1) lists the relevant mitigation and confirms how they will be secured through the DCO. In addition, measure WE14 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) requires the Contractor to develop a Drilling Fluid Management Plan. This will set out how the risk of fluid breakouts will be reduced and, in the event of an outbreak during trenchless construction works, how the breakout will be managed and mitigated to reduce environmental impacts. • Rupture of the Pipeline at high-risk locations is covered by the operational assessment of industrial accidents in Table 14-9 in ES Chapter 14 Major accidents and disasters [APP-093]. The assessment concludes that mitigation comprising the use of protective strips to restrict certain activities and interaction with the Pipeline, implementation of a Pollution Management Plan and Emergency Response Plan, and use of isolation valves would reduce the risk to as low as reasonably practicable (ALARP), with no significant adverse effect anticipated.

Table 2-8 Summary of issues raised on the theme of consultation and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-CON-01	RR-001, RR-009, RR-011, RR-018, RR-022, RR-024, RR-028, RR-033, RR-065, RR-080, RR-094, RR-106, RR-112, RR-128, RR-129, RR-130, RR-140, RR-153, RR-159, RR-166, RR-167, RR-173, RR-188, RR-192, RR-201, RR-212, RR-216, RR-218, RR-228, RR-229, RR-230, RR-236, RR-245, RR-246, RR-251, RR-269, RR-275, RR-281, RR-283, RR-284, RR-290, RR-293, RR-294, RR-300, RR-352, RR-354	Concerns over the general inadequacy of pre-application consultation on the Project.	The Consultation Report [APP-029] and Table 1-1 in Consultation Report Annex 1 – Consultation Compliance Checklist [APP-030] demonstrate how the Applicant complied with the Planning Act 2008 (PA 2008) in undertaking meaningful and adequate consultation across the pre-application stage of the Development Consent Order (DCO) process. The adequacy of consultation was also considered by all seven host local authorities when the Applicant consulted them in preparing the Adequacy of Consultation Milestone (AoCM) as part of the pre-application stage. All seven local authorities assessed the Applicant as having complied with the duties to consult and publicise. Subsequently, the seven host local authorities confirmed through their Adequacy of Consultation Representations during the acceptance stage that the Applicant had complied with sections 42, 47 and 48 of the PA 2008. The Planning Inspectorate concurred and the application has been accepted for examination.
RR-CON-02	RR-002, RR-009, RR-018, RR-026, RR-044, RR-046, RR-094, RR-129, RR-192, RR-200, RR-216, RR-230, RR-283, RR-354	Concerns that consultation did not take place at a formative stage before the selection of water recycling via Havant Thicket Reservoir in December 2021.	Public Consultation 2021 focussed on the desalination proposal, as presented in the Water Resources Management Plan 2019 (WRMP19) as the Preferred Strategy, and alternative options under consideration to address future water supply needs. The consultation sought feedback on: • The Fawley desalination proposal, presented as the 'base case' and the preferred option to address water supply shortages. • Eight alternatives as backup solutions should the 'base case' not be delivered. The backup solutions presented for consultation comprised of smaller capacity desalination alternatives, alongside water recycling and water transfer options. The alternatives were part of the wider range of strategic options being considered. This consultation made clear that further environmental assessment, technical appraisal and design development would continue following consultation and would inform any option taken forward. The feedback from Public Consultation 2021 was considered as part of the options appraisal process in which the decision was taken to select water recycling and transfer, the Project, rather than the 'base case'. For more information, please see Chapter 5 in the Consultation Report [APP-029] and Chapter 3 of the Scheme Development Report [APP-073].

Reference	RR references	Summary of issue raised	The Applicant's response
RR-CON-03	RR-002, RR-009, RR-018, RR-129, RR-192, RR-352, RR-354	Concerns that the Applicant failed to follow the statutory consultation process required by the Water Industry Act 1991 (sections 37A–37C) following a material change to the Water Resources Management Plan.	Section 37A(5) of the Water Industry Act 1991 requires water undertakers to review its plan before the anniversary of the date it was published and send a statement of conclusions to the Secretary of State. Section 37A(6) then requires the water undertaker to prepare and publish a revised plan where a) the review indicated a material change in circumstances, b) it is directed to do so by the Secretary of State, or c) in any event within five years. The Applicant maintains that the change in the preferred approach from desalination to the Project did not represent a material change to WRMP19. WRMP19 identified a 75Ml/d desalination scheme at Fawley but required investigation of strategic alternative schemes in parallel with developing the preferred strategy. The Project represents a refinement of that strategic backup option identified in WRMP19. The case for the Applicant's decision not to reconsult on desalination was set out in Annex 8 of the Gate 2 submission at 4.2 and is copied below: *"There is limited guidance available as to what constitutes a "material change of circumstances". In England, the Water Resources Planning Guideline – Version 9 published in February 2021 ("the Guideline") provides at section 3.9 that "…you must consult with the Environment Agency and/or Natural Resources Wales on any substantial changes that you wish to make to your final plan. For example, implementation of new resources not mentioned in your plan. If the changes are 'material' you must prepare a revised draft plan for re-consultation. Material changes are those likely to significantly impact customers through higher bills, changing their security of supply or significantly affect the environment. The Environment Agency and/or Natural Resources Wales will provide technical guidance to the relative governments.* *"Southern Water considers that, on the basis of information currently available, there is a strong case that when compared with Fawley desalination, the selection of Option B.4 or B.5 would not significantly impact customers through higher bills, change their security of supply or significantly affect the environment. On the contrary, it is considered that Option B.4 and Option B.5 each has fewer environmental impacts than the option included within WRMP19, such that lesser environmental impacts would result. In addition, B.4 and B.5 are each less expensive to deliver than Fawley desalination, and so would not be expected to significantly impact customers through higher bills – indeed, both could result in lower bills than would have been the case with Fawley desalination. It is also not considered that selection of Option B.4 or B.5 would significantly impact customers through changing their security of supply as against the option in WRMP19.* *"On that basis, Southern Water has concluded that there is no material change of circumstances in relation to WRMP19 resulting from the selection of the Selected Option and the Back-Up Option at Gate 2. Notwithstanding this position, however, preparation of WRMP24 is already underway, and through the preparation and consultation on draft WRMP24 there will be a mechanism for extensive consultation and engagement around the changes from the WRMP19 preferred strategy.*

Reference	RR references	Summary of issue raised	The Applicant's response
			"This is reported in Southern Water's WRMP19 Annual Review." Water Resources Management Plan 2024 (WRMP24) has now been subject to the required consultation, as has the regional planning exercise that was also part of this planning and engagement/consultation process. The Applicant now has permission to publish WRMP24 in December 2026 from the Department for Environment, Food and Rural Affairs (Defra).
RR-CON-04	RR-018, RR-129, RR-192, RR-294, RR-354	Concerns that consultation failed to comply with the Gunning Principles, including the duty to provide sufficient information for intelligent consideration.	The Applicant has had regard to the Gunning Principles when undertaking statutory consultation for the Project. Full details can be found in section 3.6 of the Consultation Report [APP-029]. The Applicant's regard is summarised below. **Principle 1: Consultation must be carried out when proposals are at a formative stage** The Summer 2022 Consultation represented the first stage of consultation on the emerging proposals, providing an early opportunity to gather initial views from stakeholders and local communities. The Summer 2024 Consultation was undertaken before the Project design and environmental assessments were finalised, enabling feedback to influence the Project's development. Responses were reviewed and taken into account as the Project evolved, with the same approach adopted for the Spring 2025, Autumn 2025 and Spring 2026 Consultations. **Principle 2: There is sufficient information given for the proposal to allow for consultees to provide 'intelligent consideration'** Multiple pre-application consultations were carried out throughout the development of the Project, presenting materials of appropriate detail to each stage. Furthermore, the materials shared were sufficient for consultees to give intelligent consideration to the proposals and were proportionate to each stage of consultation, with targeted materials provided where consultations related to specific design refinements. **Principle 3: There is adequate time for intelligent consideration and response** The Applicant allowed consultees sufficient time to review consultation materials and provide feedback. The Summer 2024 Consultation ran for 56 days, exceeding the statutory minimum of 28 days, while the Spring 2025, Autumn 2025 and Spring 2026 consultations ran for 32, 28 and 30 days respectively. **Principle 4: 'Conscientious consideration' must be given to the consultation responses before a decision is made** In accordance with section 49 of the PA 2008, the Applicant collated, analysed and carefully considered all consultation responses, using feedback to inform the ongoing development of the Project. Consultation feedback influenced the evolution of the proposals, including design refinements consulted upon in Spring 2025, Autumn 2025 and Spring 2026. The Applicant also demonstrated how consultation responses had been taken into account

Reference	RR references	Summary of issue raised	The Applicant's response
			through the submission of an AoCM to the Planning Inspectorate in October 2025.
RR-CON-05	RR-018, RR-129, RR-294, RR-354	Concerns that consultation did not comply with the duties to consult under sections 42, 47 and 48 of the PA 2008.	The Consultation Report [APP-029] details that the Applicant complied with the requirements of sections 42, 47 and 48 of the PA 2008. Sections 9.3,10.3,11.3 and 12.3 of the Consultation Report [APP-029] outline collectively the processes that the Applicant took at each stage to identify prescribed bodies, relevant local authorities and relevant section 44 persons with an interest in land where applicable under section 42 of the PA 2008. In addition, methods of notification for section 42 stakeholders are also detailed. Section 9.5 demonstrates compliance with the 2024 Statement of Community Consultation (SoCC) produced for the Summer 2024 Consultation, please see Appendix E.9 of the Consultation Report Appendix E – 2024 SoCC [APP-041]. Section 10.5 demonstrates the Applicant's compliance with section 47 of the PA 2008 for the Spring 2025 Consultation Sections 9.6 and 10.6 present the Applicant's process for publicising the Summer 2024 Consultation and Spring 2025 Consultation. Table 9-7 and table 10-5 outline the publications where notices were published within regional and national newspapers, as well as placing notices at 5km intervals along the Project route, thereby complying with section 48. Compliance with the PA 2008 is summarised in table 1-1 in Consultation Report Annex 1 – Consultation Compliance Checklist [APP-030]. Each of the host authorities confirmed, when consulted on the AoCM, that in their opinion the Applicant had, at that point, complied with the requirements of sections 42, 47 and 48 of the PA 2008. The Applicant did not receive any comments from the Planning Inspectorate that required additional steps pre-application. The local authorities' positions were subsequently confirmed through Adequacy of Consultation Representations. The Planning Inspectorate concurred and the application has been accepted for examination.
RR-CON-06	RR-003, RR-005, RR-006, RR-018, RR-026, RR-046, RR-081, RR-094, RR-128, RR-129, RR-140, RR-153, RR-159, RR-193, RR-200, RR-216, RR-230, RR-246, RR-283, RR-354	Concerns that those most likely to be affected by the Project were not adequately identified, notified or consulted, contrary to the Water Industry Act 1991 (section 37B).	Consultation under the Water Industry Act 1991 (for WRMPs) is different to that under the PA 2008 (for this Project). The consultation on the WRMP seeks input in relation to the high-level proposals for securing water resources over the next 50 years. Notwithstanding this, the communities likely to be impacted by the construction and operation of the Project were correctly identified and notified through the DCO pre-application stage consultations. Consultation under the DCO process was both targeted at those likely to be impacted by the construction and operation of the project, via direct mailing, newspaper publicity, site notices, local events, webinars, and wider via social media posts and publicity in local and national newspapers to ensure everyone had the opportunity to be aware of the Project and make comments during formal consultation.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-CON-07	RR-009, RR-018, RR-060, RR-094, RR-106, RR-140, RR-157, RR-159, RR-200, RR-230, RR-239, RR-245, RR-269, RR-275, RR-283, RR-290, RR-352, RR-354	Concerns that Portsmouth Water customers and residents of West Sussex who will receive recycled water were not consulted on the change to their drinking water source.	The PA 2008 does not require direct consultation with every potential end user of water supplied through the wider network. However, pre-application consultation activities were open to all interested parties and included engagement across the areas potentially affected by, or interested in, the Project. The Summer 2024 Consultation included a Consultation Zone D which covered Hampshire and the wider area, including most of the Portsmouth Water supply area. Notices relating to the statutory consultations were placed in both local and national newspapers. Portsmouth Water's WRMP24 material demonstrates that Portsmouth Water customers and stakeholders were aware of, and engaged with, the Project and the potential use of recycled water via Havant Thicket Reservoir. Portsmouth Water consulted on its draft WRMP24 from 15 November 2022 through extensive engagement materials and methods. Please also refer to the Applicant's response to Action Point ISH1-03 in 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) in relation to consultation on the change of supply.
RR-CON-08	RR-018, RR-153, RR-354	Concerns that residents and parish councils in East Hampshire, including Horndean Parish Council, were not directly engaged or provided with consultation materials locally.	The 2024 SoCC produced for the Summer 2024 Consultation (see Appendix E.9 of the Consultation Report Appendix E – 2024 SoCC [APP-041]), set out the Applicant's approach to raising awareness and promoting the Summer 2024 Consultation to stakeholders via the use of Consultation Zones. Much of East Hampshire is not located within the proximity of the pipeline routes or other assets that are associated with the Project and thus are not likely to be affected by the building of its infrastructure. However, the parts of it that are, including Horndean Parish Council, fell within Consultation Zones C and D, which included promotion of consultation via posters, adverts in papers and social media campaigns. As well as consultation material being available to view online, more locally to Horndean parish a deposit location at Waterlooville Library was stationed for stakeholders to see physical copies in the Summer 2024 Consultation and available via request at the Spring 2025 Consultation. Two in-person events were also held in Havant during the Summer 2024 Consultation for stakeholders to view consultation materials and ask the Project team questions in person.
RR-CON-09	RR-018, RR-129, RR-153, RR-354	Concerns that the 2021 non-statutory consultation focused on Fawley desalination and was not designed or adequate to support selection of an alternative option, including the Hampshire Water Transfer and Water Recycling Project.	The non-statutory Public Consultation 2021 presented plans for a desalination plant at Fawley, alongside alternative backup solutions, such as water recycling and water transfer, in case desalination proved undeliverable. The consultation was not intended to present a choice between desalination and the alternative options. Feedback to Public Consultation 2021 included comments on the energy use, cost and environmental impacts of desalination. Consultees generally favoured alternative solutions, particularly water transfer and water recycling, believing these would have lower environmental impacts and costs. This feedback contributed to a further options appraisal which identified the Project as the preferred solution to address the water supply

Reference	RR references	Summary of issue raised	The Applicant's response
			deficit in Hampshire. Refer to Chapter 5 of the Consultation Report [APP-029] and Chapter 3 of the Scheme Development Report [APP-073].
RR-CON-10	RR-018, RR-153, RR-192, RR-354	Concerns that consultation on alternatives did not begin at the earliest stages of scheme evolution, as required by NPSWRI paragraph 3.5.	WRMP19 required the Applicant to investigate strategic alternatives, including water recycling, in parallel with developing the preferred desalination option. That is clear in WRMP19 and also the price review 2019 (PR19) Final Determinations published at the same time in December 2019. The Applicant's Gate 1 submission reported the Base Case as Fawley (Option A.1) along with other desalination options (Options A.2 and D.1) and water recycling (Options B.1, B.2, B.3, B.4 and B.5) and water transfer (Options D.2). This was also reflected in Public Consultation 2021 which set out the 'base case', a desalination plant at Fawley, and the alternative backup options in case desalination proved undeliverable, noting that option B.1 was the strategic alternative option presented in WRMP19 but was not subsequently being progressed as an alternative to the base case given environmental concerns. Public Consultation 2021 highlighted the work being undertaken to develop a desalination plant at Fawley noting that the desalination proposal and the alternative options were all at an early feasibility stage of development. A significant proportion of respondents agreed that water recycling alternatives would be an acceptable alternative to a desalination plant at Fawley. Considering this, the Applicant engaged with regulators and other stakeholders on the options appraisal process and confirmed the new preferred solution in December 2021 in the interim update and then later in Gate 2 documents. Consistent with the purpose of the consultation, information was presented across the alternative options to enable stakeholders to understand the broad characteristics, opportunities and constraints associated with each and to provide feedback that could inform option selection. Public Consultation 2021 was therefore intended to seek views on the strategic options under consideration rather than on detailed designs. As all options were at an early stage of development, the environmental information available was necessarily high-level and indicative in nature. Feedback received from consultees formed one of a number of inputs to the options appraisal process. Further detail was later developed to inform the options appraisal process carried out to inform the Applicant's progression of a strategic water resource through the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process.
RR-CON-11	RR-018, RR-354	Concerns that consultation materials, including the Overview Map, did not clearly show which communities would receive recycled water, particularly customers in the Portsmouth Water supply area.	The Applicant believes that the comments relate to the overview map shared as part of the Summer 2022 Consultation. That consultation focused on the likely effects of constructing and operating the Project infrastructure; it was not intended to identify or consult every customer who may later receive water from the Project. 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

Reference	RR references	Summary of issue raised	The Applicant's response
			communication. This approach has been communicated through the 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. Please also refer to the Applicant's response to Action Point ISH1-03 in 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) in relation to consultation on the change of supply.
RR-CON-12	RR-018, RR-354	Concerns that insufficient information was provided in consultation materials on alternative options, environmental impacts, water quality modelling and technical matters to enable intelligent consideration.	Multiple pre-application consultations have been carried out throughout the development of the Project, presenting materials of appropriate detail at each stage to allow for consultees to give intelligent consideration to the proposals. The consultation materials at each stage complied with the statutory requirement that the information provided enabled consultation bodies to develop an informed view of the likely significant effects of the proposals (The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017). Regarding alternative options for the Project, Public Consultation 2021 consulted on alternative options should the Applicant's desalination proposal not be progressed. The alternatives consulted on were a smaller capacity desalination proposal, alongside water recycling and water transfer proposals. These were described as backup solutions. The Summer 2022 Consultation appropriately addressed the process undertaken to select the Project, pipeline corridor options, zones for Above Ground Plant (AGP), and the proposed site for the Water Recycling Plant (WRP). Any identification of likely environmental impacts was necessarily high level and indicative at that formative stage of project development. With regard to the statutory consultations, the Summer 2024 Consultation included material which described the design development process since the Summer 2022 Consultation. The Applicant also presented the preliminary environmental information in the form of a Preliminary Environmental Information Report (PEI Report). Extensive water quality modelling had progressed in 2025, and the Spring 2025 Consultation included this updated environmental water quality information, and information regarding 25 design refinements. The Autumn 2025 Consultation described and consulted on eight design refinements and was targeted to specific landowners who may be impacted by the proposed refinements. The Spring 2026 Consultations included two design refinements and was also of a targeted nature.
RR-CON-13	RR-018, RR-354	Concerns that key technical documents, including Options Appraisal, Strategic Environmental Assessment and Habitats Regulations Assessment materials, were classified as restricted or heavily redacted and were not readily accessible for scrutiny.	The redactions mentioned by Interested Parties related to documents submitted as part of the RAPID regulatory process and were made under prescribed rules relating to sensitive material but did not inhibit understanding of the design development and option selection. The Applicant also presented the preliminary environmental information in the form of a PEI Report as an opportunity to understand the Environmental Impact

Reference	RR references	Summary of issue raised	The Applicant's response
			Assessment (EIA) at an early stage. In addition, the Habitats Regulations Assessment (HRA), as referenced within the PEI Report, has been published.
RR-CON-14	RR-018, RR-028, RR-217, RR-354	Concerns over the timing of consultations during summer holiday and pre-election (purdah) periods, reducing public participation.	The extension of Public Consultation 2021 (a result of the Applicant responding to feedback from some residents in Fawley) resulted in it coinciding with the pre-election period for local elections. The pre-election period ran from the 25 March 2021 to 6 May 2021, during which time local members, being elected officials at government level, such as councillors, will generally refrain from making public announcements. As the Applicant had already provided six weeks in advance of the pre-election period commencing for public bodies and local authorities to respond, the extension was not considered to impact upon or to have been influenced by the pre-election period. The Summer 2022 Consultation overlapped with the school summer holidays; however, the Applicant provided sufficient time for stakeholders to respond and allowed 6 weeks. In addition, a hybrid approach to consultation with information available online on the dedicated consultation website for the Project, webinars, as well as in-person events. This format was selected to maximise accessibility, clarity and reach, allowing stakeholders to participate in a way that was convenient to them. Statutory consultations for the Project were not undertaken during school holiday times or pre-election periods.
RR-CON-15	RR-018, RR-354	Concerns that consultation was inadequately publicised, including absence of, or poorly located, site notices, lack of direct mailing to customers, and only a single press release, at Havant Thicket Reservoir, the WRP site and along the pipeline routes.	As set out in the Consultation Report [APP-029] and the 2024 SoCC (see Appendix E.9 of the Consultation Report Appendix E – 2024 SoCC [APP-041]), the Applicant had multiple channels for publicising the Summer 2024 Consultation. Split into four Consultation Zones, stakeholders received notification letters, leaflets, emails, posters, newspaper adverts across multiple and social media campaigns, depending on their proximity to the pipeline route. An email was also sent to members of the wider community who had previously provided email contact details and expressed an interest to be kept informed about updates regarding the Project. As Havant Thicket Reservoir is a Portsmouth Water project, the Applicant asked for placement of posters at the site. The Applicant placed site notices for the statutory consultation. Information on site notices are detailed within sections 9.3, 10.3 and 11.3 of the Consultation Report [APP-029], outlining maps of placement and number of notices.
RR-CON-16	RR-018, RR-354	Concerns that consultation documents and materials were not deposited in libraries or public buildings in communities that would receive recycled water, including Southampton, Winchester, Gosport, Chichester and Hayling Island.	For the Summer 2024 Consultation, the Applicant provided access to the consultation brochure in the deposit locations listed in the 2024 SoCC (see Appendix E.9 of the Consultation Report Appendix E – 2024 SoCC [APP-041]), which did not include Southampton, Winchester, Gosport, Chichester and Hayling Island. The Summer 2024 Consultation was intended to enable communities in the vicinity of the Project to comment on the proposed infrastructure and its likely effects during construction and operation, rather than to engage all customers who may later receive a change of supply. Accordingly, the locations were chosen to service communities within the

Reference	RR references	Summary of issue raised	The Applicant's response
			vicinity of the Project, and were selected following consultation with host local authorities. Wider deposit locations based on potential future supply areas were not considered necessary as targeted engagement with customers affected by a change of source will be undertaken closer to switch-on, when the supply areas and operational information are sufficiently mature for communications to be accurate and useful. Notwithstanding that, Consultation Zone D covered Hampshire and the wider area, including most of the Portsmouth Water supply area. Notices relating to the statutory consultations were placed in both local and national newspapers.
RR-CON-17	RR-018, RR-354	Concerns over the accessibility and usability of the online only 2021 consultation platform and subsequent consultation websites.	Covid restrictions precluded normal consultation practice. The Town and Country Planning (Development Management Procedure, Listed Buildings and Environmental Impact Assessment) (England) (Coronavirus) (Amendment) Regulations 2020 were in force at the time of Public Consultation 2021. Therefore, the Applicant had regard to this when undertaking this consultation. Although some COVID-19 restrictions were lifted on 8 March 2021, in-person events did not take place and a digital first approach was adopted. A virtual room was developed so members of the public and stakeholders could access consultation materials while adhering to Covid restrictions at the time. Following feedback received from some residents in Fawley who said they had not been contacted directly or had not seen the consultation promotion, the Applicant responded by distributing notification letters and extending the consultation for an additional 33 days, from the original 42 days.
RR-CON-18	RR-018, RR-129, RR-281, RR-354	Concerns that the 2024 statutory consultation summary feedback report excluded 385 emails and 3 letters (39% of responses), contrary to the duty under section 49 of the PA 2008.	The issue raised by Interested Parties refers to the pie chart statistics presented in the Applicant's interim reporting in January 2025 via Appendix F.30 (Summer 2024 Summary of Feedback Report) of the Consultation Report Appendix F – Statutory Summer 2024 Consultation - 7 of 7 documents [APP-048]. The pie charts only reported the data that the Applicant received through the feedback form closed questions as these directly answered the questions asked in the feedback form. This is stated in the text in the Summer 2024 Summary of Feedback Report. All responses received, including letters, emails and the feedback form, were included in the summary under the 'what you told us' section for each theme. Section 9.7 of the Consultation Report [APP-029] sets out the framework and approach used to analyse the Summer 2024 Consultation feedback. Section 9.8 of the Consultation Report [APP-029] is a summary of all feedback received to the Summer 2024 Consultation and section 9.9 of the Consultation Report [APP-029] is a summary of the Applicant's response to that feedback.
RR-CON-19	RR-018, RR-354	Concerns that consultation responses and objections were not conscientiously taken into account by decision makers and did not trigger a review of alternatives.	The consideration of relevant responses received to pre-application statutory consultation and publicity has been set out in the following locations: • Summer 2024 Consultation

Reference	RR references	Summary of issue raised	The Applicant's response
			○ Section 9.7 of the Consultation Report [APP-029]; and ○ Appendix F.29 (The Applicant's response to feedback) [APP-047] • Spring 2025 Consultation ○ Section 10.7 of the Consultation Report [APP-029]; and ○ Appendix G.25 (The Applicant's response to feedback) [APP-050] • Autumn 2025 Consultation ○ Section 11.7 of the Consultation Report [APP-029]; and ○ Appendix H.9 (The Applicant's response to feedback) [APP-051] • Spring 2026 Consultations ○ Section 12.7 of the Consultation Report [APP-029]; and ○ Appendix I.13 (The Applicant's response to feedback) [APP-052] Having regard to all feedback received, the Applicant did not consider it necessary to revisit any of the options appraisal carried out either as part of WRMP19 or the subsequent options appraisal process in 2021 as part of the RAPID Gated process, nor consider any further alternatives thereafter, other than those already under consideration through the Water Resources South East (WRSE) Regional Plan and the Applicant's WRMP24 water resources planning processes running in parallel to the development of the Project.
RR-CON-20	RR-018, RR-129, RR-300, RR-354	Concerns over the level of public opposition indicated by consultation responses and community meetings, including that 68% of 2024 respondents did not support the Project and a 20% fall in support since 2022.	The Applicant takes community consultation very seriously and has provided the local community with opportunities to influence the evolution of Project. It is not, however, the purpose of consultation, nor is it necessary, to reach a majority consensus on the use of water recycling as a sustainable water source. The Applicant has a statutory duty to maintain a secure and resilient supply of potable water. The need for additional water resources, and the identification and assessment of potential options to meet that need, were considered through the WRMP and options appraisal processes which were subject to consultation and environmental assessment and led to the identification of water recycling as part of the preferred strategy for securing a resilient future water supply. Feedback received to the various consultations has informed the design of the Project.
RR-CON-21	RR-009, RR-011, RR-018, RR-141, RR-284, RR-352, RR-354	Concerns that the Applicant has not been open and transparent about the Project, including the implications for the source of drinking water and the plans for a future pipeline extending into West Sussex.	Multiple consultations have been carried since 2021 which have been clear about all aspects of the Project and its development, including water recycling and how this new source will support supplies in Hampshire. Pipeline routing options have been articulated clearly and transparently throughout consultation from the Summer 2022 Consultation. 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

Reference	RR references	Summary of issue raised	The Applicant's response
			approach has been communicated through the 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. The supply of water to Sussex has been identified in WRMP24 as a possible longer-term opportunity associated with Havant Thicket Reservoir. Should a future proposal be taken forward through subsequent water resources planning processes, the details of how it could be delivered would be developed and consulted upon at that time, as appropriate. Please also refer to the Applicant's response to Action Point ISH1-03 in 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) in relation to consultation on the change of supply.
RR-CON-22	RR-018, RR-354	Concerns that the Applicant refused requests to establish a water recycling stakeholder sub-group in 2022 and 2023, requiring the community to initiate its own public meetings.	Stakeholder engagement has been undertaken through a range of consultation and stakeholder engagement activities, including participation in Portsmouth Water's Havant Thicket Reservoir Stakeholder Group. The Applicant has actively participated in this forum since its inception, providing updates on the Project and its relationship with the consented Havant Thicket Reservoir scheme. The Applicant did not consider it necessary to establish a separate stakeholder group focused solely on water recycling, as relevant matters could be discussed through existing engagement mechanisms, including the Havant Thicket Reservoir Stakeholder Group and formal consultation processes. Stakeholders and local communities were able to provide feedback throughout the Project's development through meetings, briefings, consultation events, and statutory consultation periods. Alongside engagement activities, local groups were encouraged to provide feedback at formal consultation stages.
RR-CON-23	RR-018, RR-031, RR-354	Concerns that customers have not been consulted on whether they are prepared to drink recycled water, and that engagement with recipient customers is not planned until 2033.	It has not been the Applicant's intent, through the DCO or WRMP consultations, to consult on willingness to drink purified recycled water. Prior to any change of source for drinking water, the Applicant would engage all customers likely to be affected by this as per the engagement plan communicated to regulators through the RAPID gated process. This would be carried out much closer to that point in time, rather than 8-9 years in advance. Please also refer to the Applicant's response to Action Point ISH1-03 in 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) in relation to consultation on the change of supply.
RR-CON-24	RR-018	Concern that no information indicates that ethnic or religious groups with potential spiritual or moral objections to drinking recycled water have been consulted.	The Consultation Report [APP-029] outlines the Applicant's consultation with seldom heard groups, including ethnic and religious groups. Sections 6.2 and 9.2 list out how the Applicant engaged with seldom heard groups, with section 10.2 referencing approaches for consultation being replicated from Summer 2024 Consultation. Any feedback received from these groups has had regard

Reference	RR references	Summary of issue raised	The Applicant's response
			given in Appendix F.29 of the Consultation Report Appendix F – Statutory Summer 2024 Consultation - 6 of 7 documents [APP-047] and Appendix G.25 of the Consultation Report Appendix G – Statutory Spring 2025 Consultation - 2 of 2 documents [APP-50].
RR-CON-25	RR-018, RR-354	Concerns that the Applicant's AoCM Report (October 2025) does not adequately reflect deficiencies in the consultation process.	The Applicant's pre-application consultation on the Project has not been deficient; it has undertaken compliant consultation. Each of the host local authorities confirmed, when consulted on the AoCM, that in their opinion the Applicant had, at that point, complied with the requirements of sections 42, 43 and 47 of the PA 2008. This position was subsequently confirmed through their Adequacy of Consultation Representations. The Planning Inspectorate has determined through DCO acceptance that adequate consultation was undertaken prior to submission.
RR-CON-26	RR-018, RR-354	Concerns that the Applicant misrepresented facts in consultation materials, including claims of regulator approval and dismissive statements on alternative options such as aquifer storage.	The Public Consultation 2021 presented plans for a desalination plant at Fawley, alongside alternative solutions, such as water recycling and water transfer, in case desalination proved undeliverable (refer to Chapter 5 of the Consultation Report [APP-029]). At the time of the 2021 consultation, the desalination proposal and the alternative options were all at an early feasibility stage of development. Consistent with the purpose of the consultation, information was presented across the options to enable stakeholders to understand the broad characteristics, opportunities and constraints associated with each and to provide feedback. The selection of the Project has been through extensive options appraisals starting with WRMP19 where water reuse was identified as a backup to desalination at Fawley, then through work undertaken to inform the RAPID Gated process, the WRSE Reginal Planning process and feeding through into the emerging WRMP24. The Project was selected and its design consulted on through the DCO process. Key stakeholders, notably the Environment Agency (EA) have confirmed 'there is a lack of viable alternatives to the Applicant's Project that can provide the necessary scale of water supply resilience needed, and in the time frames required' (Draft Statement of Common Ground – Environment Agency, (Document reference 5.8, DCO Volume 5, Version 2). Consultation feedback received has been carefully considered alongside the wider options appraisal process. This feedback, together with the appraisal work, has reinforced the conclusion that no other solutions are capable of meeting the water need required, as confirmed by the EA.
RR-CON-27	RR-018, RR-354	Concerns that Portsmouth Water's Wave 1 customer survey and Drinking Water Inspectorate (DWI) funded research on public perception of water recycling have been used out of context to overstate public support.	The Applicant notes the concerns raised regarding references to the Cranfield University study commissioned by the DWI. References to the study's finding that there was "a relatively high level of support (79% agreement) for the utilisation of water recycling to supplement drinking water supplies" were used as part of wider engagement and communication activities to help explain water recycling, public attitudes towards it and the broader context in which water recycling schemes are being considered. The Applicant does not consider that the finding was presented in a manner intended to mislead the

Reference	RR references	Summary of issue raised	The Applicant's response
			public regarding levels of support for water recycling. The figure quoted reflects the headline finding reported by the study itself. The Applicant nevertheless recognises that the Cranfield study was not solely intended to measure support levels. The study also examined the influence of factors such as terminology, information provision and public understanding on perceptions of water recycling and included recommendations regarding engagement and communication. These findings have informed the Applicant's approach to consultation and stakeholder engagement. In particular, consultation materials have sought to provide clear explanations of the water recycling process, explain the need for additional water resources, and provide information regarding water quality standards, treatment processes and regulatory oversight. The Applicant has also sought to use clear and consistent terminology when describing water recycling. The Applicant has not relied solely upon the DWI/Cranfield research in understanding public attitudes. The Cranfield study itself recognised that perceptions of water recycling are influenced by local context, wider views on water resource management and trust in organisations responsible for delivering water services, and that public views may differ when proposals become relevant to specific communities. In recognition of this, the Applicant commissioned additional polling across the Applicant's and Portsmouth Water region in 2024 using a methodology based on the Cranfield study. This research involved 1,925 respondents and found that 60% of respondents supported the use of recycled water for drinking purposes, with a further 20% expressing a neutral position. The research also identified areas where further engagement and explanation would be beneficial, including around the water recycling process, safety, regulation and public health considerations. These findings have informed the Applicant's continuing approach to engagement and communication regarding water recycling.
RR-CON-28	RR-005, RR-018, RR-066, RR-284, RR-354	Concerns that the Project represents a material change from the originally consented spring fed Havant Thicket Reservoir and that the public and councillors were not made aware that Havant Thicket Reservoir could be used for recycled water.	Water recycling formed part of the options presented within WRMP19 and were consulted upon through that process. The use of Havant Thicket Reservoir is a refinement of that fundamental option, not a material change. Consultation under the PA 2008 relates to the specific Project for which development consent is sought and does not reopen the strategic decisions made through the WRMP process regarding the need for the Project. The Public Consultation 2021 presented plans for a desalination plant at Fawley, alongside alternative solutions, such as water recycling and water transfer, in case desalination proved undeliverable. Refer to Chapter 5 of the Consultation Report [APP-029]. Following the outcome of the 2021 options appraisal process as part of RAPID's gated process, the Summer 2022 Consultation then presented the use of water recycling and water transfer as the proposed solution to address the water shortfall in Hampshire. The Applicant's Summer 2022 Consultation made it very clear that the Applicant would be applying for a DCO for the Project and set out the next steps for that process. It included a very clear description of the Project and

Reference	RR references	Summary of issue raised	The Applicant's response
			the fact this included storage of recycled water within the consented Havant Thicket Reservoir. The original Havant Thicket Reservoir planning application was for the storage of spring water only and it was consented on that basis. The Local Planning authorities (LPAs) (Havant Borough Council and East Hampshire District Council) and other stakeholders were aware at the time the Havant Thicket Reservoir application was being determined in June 2021 that the Applicant was considering proposals to make best use of the reservoir as part of its options appraisal process. The LPAs made clear that the application must be determined on the proposal put forward and not on alternative proposals being considered by the Applicant at that time. Whilst the Applicant's emerging WRMP24 favours the use of Havant Thicket Reservoir for the storage of recycled water, the DCO process will now determine whether this should be consented. The Applicant, regulators and the LPA have always been open and transparent about the possible use of the reservoir for storing recycled water once this was realised as viable option.
RR-CON-29	RR-026, RR-094, RR-283	Concerns regarding West Sussex County Council's position that there was no legal requirement to consult West Sussex residents on the Project.	The PA 2008 consultation duties are framed around prescribed bodies, relevant local authorities, persons with an interest in land, and consultation with local communities. This approach was adopted and explained in the 2024 SoCC (see Appendix E.9 of the Consultation Report Appendix E – 2024 SoCC [APP-041]), and the statutory publicity materials for the Project. The PA 2008 does not require direct consultation with every potential end user of water supplied through the wider network. A comparable example is that consultation on a new electricity transmission line would normally focus on the route, land, construction, environmental and community effects of the infrastructure comprising the scheme, rather than consulting every electricity customer who may ultimately benefit from power transmitted through the network on the principle of reinforcement. The consultation of the pre-draft and draft 2024 SoCC also considered wider notification, including Havant Borough Council's request for direct customer notification, but this was not taken forward because the strategy remained focused on people living in the vicinity of the Project boundaries, host communities and those most likely to experience impacts from the construction and operation of the Project infrastructure.
RR-CON-30	RR-046, RR-081, RR-212, RR-218	Suggestions that the Project should be subject to independent peer review or assessment by bodies outside government agencies.	The Applicant does not consider that a separate independent peer review outside the statutory DCO process is required. The application and supporting evidence are subject to detailed examination by the independent Examining Authority appointed by the Planning Inspectorate, which scrutinises the evidence submitted by the Applicant and all Interested Parties. The examination process enables statutory consultees, local authorities, technical regulators and other interested parties to challenge evidence, submit their own evidence and seek clarification on matters of concern. The Secretary of State's decision is informed by the recommendations of the Examining Authority following this independent examination.

Reference	RR references	Summary of issue raised	The Applicant's response
			In addition, the Project's technical assessments have been prepared by suitably qualified specialists and have been discussed and commented on by the relevant statutory bodies and regulators within their respective areas of expertise. The Applicant is therefore satisfied that the DCO process provides an appropriate and robust framework for independent scrutiny of the Project
RR-CON-31	RR-060, RR-080, RR-106, RR-140, RR-173, RR-176, RR-245, RR-246, RR-290, RR-300	Requests for a proper, extended or new public consultation on the Project with those affected.	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 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 AoCM as part of the pre-application procedure and through their Adequacy of Consultation Representations. The consultation was undertaken in accordance with the 2024 SoCC, which had been developed in consultation with the host local authorities to ensure that communities were being appropriately engaged. The communities likely to be impacted by the construction and operation of the Project were correctly identified and notified through the DCO pre-application stage consultation. Consultation under the DCO process was targeted at those likely to be impacted by the construction and operation of the project, and the use of direct mailing, newspaper publicity, site notices, local events and webinars and wider via social media posts and advertisements or notices in local and national newspapers ensured everyone had the opportunity to be aware of the proposals and make comments. The Applicant has communicated the proposal for water recycling over a considerable period throughout its public consultations which were undertaken in accordance with the statutory requirements and prescribed consultee categories applicable at the time. Consultation activities were open to all interested parties and included engagement across the areas potentially affected by, or interested in, the Project.
RR-CON-32	RR-005, RR-065, RR-066, RR-166	Concerns over the lack of public confidence in, and mistrust of, the Project and the Applicant.	Please see the Applicant's response to RR-WSWO-01 and RR-WSWO-02. The Applicant recognises the importance of public confidence and has sought to address concerns through transparent engagement and evidence-based assessments. Water recycling is a well-established and internationally proven technology, and the Project will be subject to robust regulatory oversight, multiple treatment barriers, continuous monitoring, and compliance with all relevant statutory requirements.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-CON-33	RR-168, RR-193, RR-250, RR-354	Comments on the nature and effectiveness of consultation events, exhibitions and engagement with specific stakeholder groups (including landowners, horse owners and the wider Applicant's customer area).	Four consultation zones were developed to assist engagement with the local community, including landowners, equestrians and relevant facilities, for the Summer 2024 Consultation. The Consultation Zones were: • Zone A - affected landowners, tenants and businesses within the draft Order Limit • Zone B - businesses and people living within 1km of the draft Order Limits • Zone C - businesses and people living within 5km of the draft Order Limits • Zone D - Hampshire and the wider area. In addition to consulting the above, Members of Parliament representing areas within and adjacent to the four zones and affected local interest groups such as residents' associations, community groups, and non-prescribed environmental organisations outside of those consultation bodies prescribed under the EIA Regulations were also engaged. The Applicant also consulted with prescribed consultees (section 42(1)(a)), as presented in Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended), relevant local authorities (section 42(1)(b)) and persons with an interest in land (PILs) (section 42(1)(d)). Six in-person consultation events were held to support the Summer 2024 Consultation. Venues for these consultation events were selected to ensure accessibility. The Applicant published section 48 notices, sent leaflets, published advertisements within local newspapers circulating in the vicinity in which the Project would be situated, displayed posters and publicised details of the consultation via the Applicant's Facebook and Instagram accounts. The Applicant was available at the consultation events to answer questions, all consultation documents were available to view, and feedback forms, the PEI Report Non-Technical Summary and the Consultation Brochure were available to take away. Additionally, information was provided on the Project in the form of display materials including pop-up banners (that included information about different elements of the Project, such as proposed locations for AGP) and display boards showing the preferred proposed pipeline route sections. Across the six in-person consultation events there were 769 attendees. The events each ran for six hours to enable as many people to participate as possible. To respond to concerns raised about undertaking consultation with the Applicant's customers, please refer to the response to RR-CON-06 and RR-CON-07.

Table 2-9 Summary of issues raised on the theme of cumulative effects and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-CEF-01	RR-354	Request that the Examining Authority examines whether the assessment of in-combination effects properly accounts for other water recycling schemes proposed in the region.	The Applicant acknowledges the request for the Examining Authority to examine the assessment of interactions and subsequent effects between the Project and other water recycling schemes. For this Project this is termed the 'Cumulative Effects Assessment' (CEA), with the 'in-combination assessment' covering effects from the interaction between individual effects of the Project, i.e. the interrelationship between different environmental topics. The CEA includes consideration of the Project with 'Other development, which is related or consequential, but which is proposed to be consented or delivered separately'. This is referring to development that is related or consequential to the Project and this assessment is set out in Environmental Statement (ES) Appendix 20.2 CEA [APP-209], under section 1.5, concluding no residual likely significant cumulative effects. With respect to other water recycling schemes, none were identified for consideration in the CEA. Table 20-9, within ES Chapter 20 Cumulative and in-combination effects [APP-099] provides the tiered methodology used to identify 'other development' projects for consideration in the CEA. Table 20-9 sets out the three tiers of other existing and or approved development as set out in Table 2 of the Planning Inspectorate (2024) Nationally Significant Infrastructure Projects: Advice on CEA. There were no other identified recycling schemes that fell into one of the three tiers: • Is under construction, permitted application under the Planning Act (2008) or submitted application under the Planning Act or other regime but not yet determined (Tier 1). • Is a project on the Planning Inspectorate's programme of projects (Tier 2). • Is a project on the Planning Inspectorate's programme of projects where a scoping report have not been submitted; identified in the relevant Development Plan and emerging Development Plan, or identified in other plans and programmes as appropriate, which set the framework for future development consents or approvals, where such development is reasonably likely to come forward (Tier 3).
RR-CEF-02	RR-266	Request that the Examining Authority scrutinises the cumulative effects of continued wastewater and reject water discharges to sea.	The CEA, set out ES Appendix 20.2 CEA [APP-209], includes the assessment of the interrelationship between the Project and other marine applications in section 1.7. The assessment concludes there are no residual likely significant cumulative effects identified. ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) provides the assessment of reject water from the Water Recycling Plant being released into the sea via the Eastney Long Sea Outfall (LSO). Paragraphs 19.8.90 to 19.8.94 conclude the changes in water quality parameters and salinity are insignificant, and would not result in any changes to water quality and changes would not extend into connected water bodies such as Langstone Harbour or the tidally influenced Hermitage Stream. Table 19-62 provides the assessment of chemical release from the combined discharge at Eastney LSO and concludes changes in the currently consented

Reference	RR references	Summary of issue raised	The Applicant's response
			parameters would be insignificant compared to natural variation experienced within the receiving water or within variations experienced within the wastewater itself. Significant changes to water quality associated with the currently consented parameters at Eastney LSO are not predicted. The discharge of reject water via the Eastney LSO will also be subject to an environmental permit. Paragraph 3.8.3 of the National Policy Statement for Water Resources Infrastructure confirms that the Secretary of State "should work on the assumption that, in terms of the control and enforcement, the relevant pollution control or other consenting regime will be properly applied and enforced. Decisions under the Planning Act 2008 should complement *but not duplicate* those taken under the relevant pollution control regime". Accordingly, the Examination should also assume that the environmental permit will effectively control the risk of impacts, including cumulatively, from this discharge.

Table 2-10 Summary of issues raised on the theme of design of AGP and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-DAGP-01	RR-309	Comment on the building heights of the Above Ground Plant as an issue the Examining Authority should consider.	The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) sets out the maximum building height parameters for each Above Ground Plant (AGP) site. The proposed maximum height of each building has been established by having regard to the expected plant and maintenance requirements, ensuring that sufficient space is allowed for safe operability and maintainability. The landscape and visual effects associated with the AGPs have been assessed as part of the Environmental Statement (ES) Chapter 13 Landscape and visual [APP-092]. The detailed design will be developed in accordance with the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) and within the maximum building height parameters established for the relevant AGP site. Screening and integration into the landscape will be considered at each site, taking account of the local character by using materials and a colour palette appropriate to the local context.
RR-DAGP-02	RR-309	Comment on the incorporation of solar photovoltaic (PV) in the design of the Above Ground Plant as an issue the ExA should consider.	The Applicant notes the suggestion that the Examining Authority should consider the incorporation of PV solar technology within the design of the AGP. The Applicant has sought to develop the Project in a manner that supports its efficient and sustainable operation of the Project, taking account of engineering, environmental, operational, safety and site-specific considerations. The design of individual Project components, including AGPs, has been informed by these considerations and has been assessed through the design development process.

Reference	RR references	Summary of issue raised	The Applicant's response
			The Applicant recognises the potential benefits of renewable energy technologies, including solar PV, in reducing operational energy demand and supporting wider sustainability objectives. However, the suitability of incorporating such technologies depends on a range of factors, including operational requirements, available space, technical feasibility, maintenance considerations, environmental effects and value for money. Renewable energy opportunities, including opportunities for on-site generation, have been considered during the development of the Project. The Applicant's approach to renewable energy is set out in Section 5.3 of the Outline Carbon Management Plan (Outline CMP) [APP-423]. The Outline CMP establishes the Project's approach to managing construction and operational carbon emissions and aligned with the principles of PAS 2080. The Applicant considers that decisions relating to renewable energy generation and low-carbon energy supply are most effectively considered through its wider energy management strategy. This enables renewable energy generation and procurement opportunities to be assessed across the broader asset portfolio, allowing investment to be directed towards solutions that deliver the greatest long-term cost and carbon reduction benefit. The Applicant therefore considers that a strategic, portfolio-based approach is better placed to secure reliable, scalable and resilient low-carbon energy supplies than project-specific renewable installations alone. Accordingly, photovoltaic solar technology is not currently proposed as a design principle or committed component of the AGPs.
RR-DAGP-03	RR-206	A suggestion that the Applicant should demonstrate the resilience of the system during abnormal operating conditions, including equipment or monitoring failure, sensor malfunction, operator error, accidental industrial discharges to the sewerage network, cyber security incidents, prolonged power outages and extreme weather events.	The Applicant has considered a range of scenarios covering normal, abnormal and credible failure conditions, as assessed in ES Chapter 14 Major accidents and disasters [APP-093]. The Operational Environmental Management Plan [APP-422] requires the development of an Emergency Response Plan which will include a suite of Incident Management procedures covering system failures. Resilience measures have been considered across the Project. At the Above Ground Plant (AGP) sites, facilities for standby generation will be provided for use in emergencies. Mitigation measures to reduce risks to as low as reasonably practicable (ALARP), including risks associated with flooding, system failure, industrial accidents, cyber-attack are set out in ES Chapter 14 Major accidents and disasters [APP-093]. All the pumps and equipment in the pumping stations at the Water Recycling Plant (WRP) site will be equipped with flow, level, and remote water quality monitoring and control which will centrally alarm if there were to be a deviation or system failure. While the system will fail-safe, the WRP site will be operational and attended by operatives 24 hours a day. Further information about the measures incorporated into the design of the WRP to manage abnormal conditions are set out in ES Chapter 3 Description of the Proposed Development [APP-082].

Reference	RR references	Summary of issue raised	The Applicant's response
			Collectively, these measures ensure that operational risks are managed and reduced to ALARP.

Table 2-11 Summary of issues raised on the theme of design of the WRP and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-DWRP-01	RR-018	Concerns over the size, appearance and nighttime lighting of the Water Recycling Plant.	The Applicant recognises the concerns regarding the size, appearance and night-time lighting of the proposed Water Recycling Plant (WRP). These matters have been assessed in the Landscape and Visual Impact Assessment (LVIA) contained within Environmental Statement (ES) Chapter 13 Landscape and visual [APP-092]. The WRP has been carefully sited close to the existing Budds Farm Wastewater Treatment Works and within an area already influenced by existing industrial development, major transport infrastructure and urban development. The design has incorporated existing landscape features where possible and includes additional planting to help integrate the WRP into its surroundings and reduce its visibility over time. In terms of appearance, the WRP will be designed in accordance with the Project's Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1), including the use of appropriate materials, colours, earthworks and landscape planting to minimise visual contrast and help the development fit within its local setting. Existing vegetation around the site will be retained where practicable and supplemented with new planting to soften views and provide visual screening. The LVIA assessed views from a number of representative locations around Langstone Harbour and the surrounding area, including the Solent Way, Broadmarsh Coastal Park, Farlington Marshes and Hayling Billy Coastal Path. The assessment concludes that views of the WRP would generally be filtered or screened by existing and proposed vegetation and would be seen in the context of existing urban and industrial development. Night-time lighting has also been considered as part of the assessment. Lighting will be designed to provide safe and secure operation of the facility while minimising light spill beyond the site boundary. The LVIA concludes that any visible lighting would be experienced in the context of the existing urban and industrial lighting environment around Havant and Portsmouth, with existing and proposed vegetation further helping to filter views. The assessment found that, while there would be temporary visual effects during construction, these effects would reduce as landscape mitigation planting becomes established. By Year 15 of operation, residual landscape and visual effects associated with the WRP are assessed as minor and not significant.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-DWRP-02	RR-084	A suggestion that the Applicant should demonstrate the consequences of credible worst case failures at the Water Recycling Plant, including single and combined failures across instrumentation, sensors, calibration, electrical, software, membrane, chemical dosing, pressure, treatment process, operator error, maintenance and isolation equipment.	The Applicant has considered a range of scenarios covering normal, abnormal and credible failure conditions, as assessed in ES Chapter 14 Major accidents and disasters [APP-093]. The OEMP [APP-422] requires the development of an Emergency Response Plan which will include a suite of Incident Management procedures covering system failures. Resilience measures have been considered across the Project. At the Above Ground Plant (AGP) sites, facilities for standby generation will be provided for use in emergencies. Mitigation measures to reduce risks to ALARP, including risks associated with flooding, system failure, industrial accidents, cyber-attack are set out in ES Chapter 14 Major accidents and disasters [APP-093]. All the pumps and equipment in the pumping stations at the (WRP site will be equipped with flow, level, and remote water quality monitoring and control which will centrally alarm if there were to be a deviation or system failure. While the system will fail-safe, the WRP site will be operational and attended by operatives 24 hours a day. Further information about the measures incorporated into the design of the WRP to manage abnormal conditions are set out in ES Chapter 3 Description of the Proposed Development [APP-082]. Collectively, these measures ensure that operational risks are managed and reduced to ALARP.
RR-DWRP-03	RR-354	Concern over the consequences of a burst in the recycled water pipeline in residential areas, including release pressure, dispersal of wastewater, and the practicality of future repairs and maintenance given the developed nature and depth of the pipeline routes.	The Applicant acknowledges the comment. Emergency releases are assessed as low likelihood with embedded mitigation set out in ES Chapter 14 Major accidents and disasters [APP-093]. All commissioning-stage measures are secured through the Outline Construction Environmental Management Plan (CEMP) (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), while all operational controls are detailed within the OEMP [APP-422]. The OEMP [APP-422] requires an Emergency Response Plan to be produced at a future stage. This will include incident management procedures covering accidents and pollution arising from a high-pressure recycled water pipe leak or rupture. Incident classification and escalation protocols will be developed in accordance with the Pipelines Safety Regulations 1996, together with environmental containment measures and coordination with environmental authorities, where reasonably practicable. These measures reduce the risk to ALARP. The pipelines will have a design life of approximately 100 years and their condition will be monitored and checked throughout operation. Isolation valves and washout valves, contained within accessible below-ground chambers, will be installed along the Pipeline route to facilitate maintenance and repair, as described in ES Chapter 3 Description of the Proposed Development [APP-082].
RR-DWRP-04	RR-354	Concerns over the use of washouts at river and stream locations posing risks to the environment through discharge of geochemically different water and	As outlined in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1), during normal operation the washout valves would be inspected and tested to check that the valves are operational. All source

Reference	RR references	Summary of issue raised	The Applicant's response
		potential invasive species transfer, and the Applicant's treatment of washouts as operationally exceptional.	water resulting from the testing of washout valves would be collected directly by a tanker, with no source water discharged to the environment, either to land or a watercourse. The risk of Invasive Non-Native Species (INNS) being released during emergency washouts or Pipeline leaks will be mitigated through the implementation of an Emergency INNS Management Plan, which will be developed post-consent and is secured in the INNS Biosecurity Plan [APP-425]. This is secured by Requirement 14 in Schedule 2 to the draft DCO [APP-023].
RR-DWRP-05	RR-281	Concern over the 60-year design life of the WRP and the need for future replacement or updating.	The Applicant acknowledges the respondent's comments regarding the long-term operational lifespan of the Project and the replacement requirements associated with components such as reverse osmosis membranes. The WRP has an overall design life of approximately 60 years, which is consistent with major water infrastructure assets. The WRP comprises a range of assets with differing design lives. Major civil infrastructure, such as tunnel shafts, chambers and manholes, is designed to last up to 100 years, while buildings are designed for approximately 60 years. Process equipment would be routinely renewed throughout the life of the facility to maintain safe, efficient and reliable operation. The WRP will be designed to allow mechanical, electrical and control components to be replaced without diminishing the routine operation, performance or capacity of the facility. The need to replace individual components over time does not reduce the overall design life of the WRP but ensures that the facility continues to provide long-term water supply resilience and operational benefits throughout its intended lifespan. The design basis has also considered provision for changes in treatment requirements over the design life of the WRP to support the long-term operation of the asset.

Table 2-12 Summary of issues raised on the theme of the EIA approach and methodology and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-EIAA-01	RR-354	A suggestion that the ExA should examine the extent to which specific impacts have been considered by the Applicant and the adequacy of proposed mitigation.	The Applicant notes the concern regarding whether the potential environmental effects of the Project have been appropriately assessed and mitigated as part of the Development Consent Order (DCO) Application. The Environmental Impact Assessment (EIA) has been undertaken in accordance with the methodology set out in Environmental Statement (ES) Chapter 5 EIA approach and methodology [APP-084]. The assessment also had regard to the ES Appendix 5.2 EIA Scoping Opinion [APP-105], and with the ES Appendix 5.3 Applicant's Response to EIA Scoping Opinion [APP-106] explaining how comments and recommendations raised through the scoping process have been addressed within the EIA.

Reference	RR references	Summary of issue raised	The Applicant's response
			Information regarding the Project design, construction assumptions and assessment parameters is provided in 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 Environmental Impact Assessment. The environmental topic chapters then assess the likely significant effects arising based on those parameters and identify any additional mitigation measures required. Construction and operation phase effects associated with the Project are assessed within the ES topic chapters. Mitigation, monitoring and management measures identified through the EIA are secured through the draft DCO [APP-023] and associated management plans, including the Outline Construction Environmental 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), the Framework Construction Traffic Management Plan [APP-415], the Outline Landscape and Ecology Management Plan (Document reference 7.5, DCO Volume 7, Version 1), the Outline Written Scheme of Investigation (Document reference 7.6, DCO Volume 7, Version 1), the Operational Environmental Management Plan [APP-422] and ES Appendix 19.9 Outline Water Monitoring Plan [APP-204]. These documents identify the monitoring, reporting, management and corrective actions required during construction and operation of the Project and are secured through relevant requirements in Schedule 2 to the draft DCO [APP-023]. The Applicant therefore considers that the likely significant effects of the Project have been appropriately identified and assessed through the EIA process. Appropriate mitigation, monitoring and management measures have been identified where required and are secured through the draft DCO [APP-023] and the associated management plans submitted with the DCO Application.
RR-EIAA-02	RR-026, RR-206	Suggestions that the evidence base underpinning the EIA should be independently peer-reviewed and verified by parties outside Government agencies and the Applicant.	The Environmental Statement (ES) has been prepared in accordance with the requirements of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and relevant national policy and guidance. The Environmental Impact Assessment (EIA) has been undertaken by suitably qualified technical specialists using recognised assessment methodologies, published guidance, site-specific surveys and technical studies appropriate to each environmental topic assessed. The competence of the organisations and individuals responsible for preparing the assessments is set out in ES Appendix 5.4 Statement of Competence [APP-107]. ES Chapter 5 EIA approach and methodology [APP-084] sets out the overarching assessment framework adopted for the Project, including the assessment methodologies and significance criteria applied throughout the EIA. The ES topic chapters explain the specific methodologies used for each environmental discipline and identify the guidance, standards and assessment criteria that informed the assessments.

Reference	RR references	Summary of issue raised	The Applicant's response
			The Applicant notes that the EIA process includes consultation with relevant statutory bodies and technical stakeholders, whose comments have informed the development of the assessments where relevant. The Examination process also provides an opportunity for Interested Parties, statutory consultees and the Examining Authority to scrutinise the environmental information submitted in support of the DCO Application. The Applicant therefore considers that the environmental evidence base supporting the Project is robust, proportionate and appropriate for the purposes of the DCO Application.
RR-EIAA-03	RR-028, RR-294, AS-033	Concerns over whether safeguards, monitoring, independent audit and enforceable controls are sufficient to assess and control operational risks throughout the lifetime of the Project.	The operational mitigation, monitoring and management measures identified through the EIA are secured through the draft DCO [APP-023], the Operational Environmental Management Plan (OEMP) [APP-422] and the Environmental Statement Appendix 19.9 Outline Water Monitoring Plan [APP-204]. These documents identify the monitoring, reporting, management and corrective actions required during operation of the Project, secured through relevant requirements in Schedule 2 to the draft DCO [APP-023]. The OEMP is required to be maintained under review over the lifetime of the Project, including being updated as appropriate to reflect changes in legislation, relevant standards, statutory guidance and recognised industry best practice (see paragraph 1.1.3 of the OEMP). The Applicant considers that the Project includes an appropriate framework of monitoring, management and regulatory oversight to identify and manage operational risks throughout its operational lifetime. For further information about the relationship between the DCO and the applicable regulatory regimes, please refer to Appendix D and 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).
RR-EIAA-04	RR-073, RR-270, RR-286, RR-300	General concerns about the environmental impact of the Project on the local area.	The ES has been prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and assesses the likely significant environmental effects of the Project during construction, operation and decommissioning. The assessment framework, methodology and significance criteria adopted for the EIA are set out in ES Chapter 5 EIA approach and methodology [APP-084]. This chapter explains how environmental effects have been identified, assessed and reported across the various environmental topics and their respective study areas considered within the ES The ES includes topic-specific assessments covering a wide range of environmental matters. Each assessment identifies relevant environmental receptors, evaluates the likely significant effects of the Project during construction, operation and decommissioning and identifies mitigation measures where required. The Applicant therefore considers that the likely significant environmental effects of the Project on the local area have been comprehensively assessed

Reference	RR references	Summary of issue raised	The Applicant's response
			within the ES and that appropriate mitigation and management measures have been identified and secured in the draft DCO [APP-023] to avoid, reduce or manage adverse effects where required.
RR-EIAA-05	RR-354	Concern that flexibility in the Project is not adequately bounded by assessed parameters.	The parameter approach to assessing the environmental effects of the Project is set out 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 maximum design parameters and reasonable worst case assumptions where aspects of detailed design will be developed post consent. These parameters are secured in the draft DCO [APP-023] and then the detailed design must remain within the defined parameters and design commitments, such as those included in the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). 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]. The Applicant therefore considers that the flexibility incorporated within the Project is clearly defined in the DCO Application and appropriately assessed in the ES.
RR-EIAA-06	RR-354	Concern over the carbon assessment and whether all Project components and factors necessary to assess a reasonable and precautionary worst case have been taken into account.	The assessment presented in ES Chapter 10 Carbon and climate change [APP-089] and carbon methodology presented in ES Appendix 10.1 Carbon assessment methodology [APP-147] incorporated a number of conservative assumptions in order that a robust and precautionary assessment of Greenhouse Gas emissions is undertaken. These included applying a 24.7% uncertainty uplift to construction and replacement carbon emissions, assuming no reduction in the carbon intensity of construction activities during the construction period, applying conservative assumptions for material wastage and disposal of excavated materials, and assuming replacement assets generate the same carbon emissions as their original installation. For operational emissions, the assessment assumed no future decarbonisation of chemical manufacturing processes, noting that chemicals representing the largest source of operational emissions. This precautionary assumption has been adopted reflecting that there is currently no agreed decarbonisation trajectory for the chemical sector. The assessment also uses mean "Full Period" operational flows incorporating both normal and drought conditions over the operational life of the Project. The methodology states that the use of mean "Full Period" flows was considered a realistic worst-case approach for the carbon assessment. It is therefore considered that the carbon assessment has been undertaken on a reasonable and precautionary worst case basis.

Reference	RR references	Summary of issue raised	The Applicant's response
			The following responses provide further detail on how the carbon assessment has considered Project components and factors to assess a reasonable and precautionary worst case: • RR-CCC-02 – consideration of construction of the Project components • RR-CCC-03 – whole-life operational assessment for 100-year operational period • RR-CCC-04 – consideration of treatment chemicals • RR-CCC-05 – consideration of flow rates • RR-CCC-06 – consideration of emissions from pumping stations, constructing on Broadmarsh landfill (from an emissions perspective) and operating connected works • RR-CCC-07 – consideration of methane release from constructing on Broadmarsh landfill
RR-EIAA-07	RR-354	Comments supporting inclusion of environmental mitigation and enhancement areas as topics for examination, with a reserved position pending further review.	The Applicant acknowledges the support for the inclusion of environmental mitigation and enhancement areas (see Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) and Outline Landscape and Ecology Management Plan (Document reference 7.5, DCO Volume 7, Version 1)) as topics for examination.
RR-EIAA-08	RR-294, RR-354	Concerns that impacts on protected habitats, water bodies, landscape, carbon, energy demand and long-term operation have not been fully assessed with effective mitigation and safeguards secured in the DCO.	The ES has been prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and includes topic-specific assessments of the likely significant environmental effects of the Project during construction, operation and decommissioning. The methodology applied across the EIA is set out in ES Chapter 5 EIA approach and methodology [APP-084]. Protected habitats and biodiversity are assessed in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) and ES Chapter 9 Marine biodiversity (Document reference 6.1, DCO Volume 6, Version 1), which consider likely significant effects during construction, operation and decommissioning, together with embedded and additional mitigation measures. Water body and water environment effects are assessed in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1), including potential effects on groundwater, surface water, water quality and water resources during construction and operation. Landscape and visual effects are assessed in ES Chapter 13 Landscape and visual [APP-092], which considers likely significant effects on landscape character, visual receptors and designated landscapes during construction, operation and decommissioning. Carbon emissions, climate resilience and climate change effects are assessed in ES Chapter 10 Carbon and climate change [APP-089], including the assessment of greenhouse gas emissions and climate resilience during construction and operation.

Reference	RR references	Summary of issue raised	The Applicant's response
			The assessment of these topics has been undertaken in accordance with the methodology set out in ES Chapter 5 EIA approach and methodology [APP-084] and having regard to the ES Appendix 5.2 EIA Scoping Opinion [APP-105] and the ES Appendix 5.3 Response to the EIA Scoping Opinion [APP-106]. Environmental mitigation, monitoring and management measures identified through the EIA are secured through the certified management plans, strategies and other control documents submitted with the DCO Application, together with the relevant requirements contained within Schedule 2 to the draft DCO [APP-023]. The Commitments Register (Document reference 6.2, DCO Volume 6, Version 1) provides a consolidated record of these commitments and identifies the mechanism through which each commitment is secured. The Environment Agency is the regulatory body responsible for the control of any discharge of potentially polluting substances into the environment. The water quality of the output from the water recycling plant will be controlled by and managed in accordance with the environmental permit. It is not the role of the DCO to speculate about how such substances will be regulated in the future. The Applicant will comply with the conditions of the environmental permit, ensuring that the recycled water does not cause harm to the environment. For further information about the relationship between the DCO and the applicable regulatory regimes, please refer to Appendix D and 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).
RR-EIAA-09	RR-354	Concern over the adequacy of the EIA in addressing modelling, indirect foreseeable effects, direct impacts and sludge disposal.	The EIA is supported by a range of technical models which have informed the assessment of likely significant environmental effects. In relation to water quality, extensive modelling was undertaken to assess potential effects associated with recycled water, reservoir operation, compensatory flows, marine discharges and surface water drainage. This is reported within ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) and supporting technical appendices, including the ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1), ES Appendix 19.3 Hydrogeological Impact Assessment [APP-198], ES Appendix 19.7 Nutrient Assessment [APP-202], - ES Appendix 19.9 Outline Water Monitoring Plan [APP-204], ES Appendix 19.5 Eastney Long Sea Outfall Solent Dispersion Modelling [APP-200], ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1) and ES Appendix 19.6 Havant Thicket Reservoir compensatory flows water quality modelling [APP-201]. The EIA has considered both direct and indirect likely significant effects in accordance with the methodology set out in ES Chapter 5 EIA approach and methodology [APP-084]. This includes the assessment of direct, indirect, secondary, cumulative, temporary, permanent, beneficial and adverse effects,

Reference	RR references	Summary of issue raised	The Applicant's response
			as required by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Direct and indirect effects are therefore considered throughout the topic specific assessments presented within the ES. The Applicant has also considered whether the Project gives rise to indirect greenhouse gas emissions. ES Chapter 10 Carbon and climate change [APP-089] considers potential indirect emissions pathways and concludes that no additional indirect greenhouse gas emission pathway arises beyond those assessed within the ES. The proposed treatment process at the WRP does not produce a solid stream and sludge management is therefore not required.
RR-EIAA-10	RR-354	Concern that the deadline for representations has not allowed sufficient time to fully review the Environmental Statement and supporting documents.	The statutory timetable for submission of Relevant Representations is established by the Planning Act 2008 process and administered by the Planning Inspectorate rather than the Applicant. The Applicant has complied with all relevant statutory requirements relating to consultation and submission of the DCO Application. In addition, the Relevant Representation stage is not intended to constitute the sole opportunity for Interested Parties to review and comment on the ES. Following registration as an Interested Party, stakeholders have the opportunity to submit Written Representations, respond to questions issued by the Examining Authority, comment on submissions made by other parties and participate in hearings throughout the examination. The DCO Examination process therefore provides appropriate opportunities for detailed review and consideration of the ES and other application documents.
RR-EIAA-11	RR-354	Concern that the assumptions made and assessment methodology within the EIA should have been clearly documented.	The ES has been prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and includes topic-specific assessments of the likely significant environmental effects of the Project during construction, operation and decommissioning. The overarching approach to the EIA is set out within ES Chapter 5 EIA approach and methodology [APP-084]. This chapter describes the assessment framework applied across the Project, including the approach to baseline characterisation, impact assessment, significance evaluation, mitigation, cumulative effects assessment and the use of design assumptions and assessment parameters. Each ES topic chapter contains sections describing the assessment methodology applied for that environmental topic. These sections explain the relevant assessment approach, guidance, study area, baseline data sources, survey information, significance criteria and assessment methods adopted. Separate sections are also provided within the topic chapters to identify assumptions and limitations relevant to the assessment, where applicable. Topic specific assumptions and limitations are identified separately within the relevant ES topic chapters and supporting appendices, rather than within the methodology sections themselves. The Applicant therefore considers that the assessment methodologies, assumptions and limitations relevant to the EIA have been clearly documented

Reference	RR references	Summary of issue raised	The Applicant's response
			within ES Chapter 5 EIA approach and methodology [APP-084], the relevant topic chapters and supporting technical appendices.
RR-EIAA-12	RR-354	A suggestion that the EIA must consider reasonably foreseeable indirect effects, such as consumers turning away from tap water, in line with the R (Finch) v Surrey County Council judgment.	The EIA has been undertaken in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and the methodology set out in ES Chapter 5 EIA approach and methodology [APP-084]. The assessment identifies and evaluates the likely significant environmental effects of the Project, including indirect and secondary effects where these are considered reasonably foreseeable. The Applicant therefore considers that the scope of the assessment is appropriate and that reasonably foreseeable indirect effects have been considered in accordance with the EIA methodology presented within the ES and in line with the R (Finch) vs Surrey County Council case. The concern that some customers could respond to water recycling by using more bottled water or home filtration is noted. ES Chapter 17 Socio-economics, tourism and health [APP-096] directly considers this issue. It explains that, following customer insight undertaken across the Applicant's region, communities are considered to be broadly accepting of the effectiveness of the technology at population level, although some concerns about drinking water safety and suitability are expected to persist for a minority of people. Where individuals choose not to drink mains supply water, this may result in an additional financial burden from purchasing bottled water. However, as this issue is likely to affect, at most, a small minority of the population, the overall magnitude of impact is assessed as minor. For vulnerable groups, including people with existing health conditions or people on low incomes who may experience financial stress from purchasing water, ES Chapter 17 Socio-economics, tourism and health [APP-096] assesses this as a minor adverse effect on health and wellbeing, which is not significant. This effect does not relate to a physical health risk, but to a mental health risk associated with a perceived effect. The Applicant will continue to engage with customers and stakeholders to explain how water recycling would produce safe and wholesome drinking water, why it is needed to secure resilient supplies, and how concerns about bottled water use have been considered in the assessment. 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. Please also refer to the Applicant's response to Action Point ISH1-03 in 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) in relation to consultation on the change of supply.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-EIAA-13	AS-034	Concerns that the EIA improperly scopes out existing infrastructure (including the Eastney Long Sea Outfall) by treating it as requiring only an operational change of use assessment.	As set out in paragraph 3.2.2 of ES Chapter 3 Description of the Proposed Development [APP-082], the Project would include the use of some existing infrastructure including the Eastney Long Sea Outfall (LSO). As no changes are proposed for the Eastney Transfer Tunnel and Long Sea Outfall, there is no assessment of construction effects to present in the ES. The EIA Scoping Opinion [APP-105] confirms the ES is required to assess the effects associated with any change of use of existing infrastructure (Scoping ID 2.1.3). This includes operational effects from changes in release volumes and concentrations of treated wastewater from the existing Eastney LSO, as assessed in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) and ES Chapter 9 Marine biodiversity (Document reference 6.1, DCO Volume 6, Version 1). The Applicant considers the ES to be robust with respect to the scope of the assessment of existing infrastructure.

Table 2-13 Summary of issues raised on the theme of interface with the Applicant's existing infrastructure and assets and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-ISWI-01	RR-238	Concern that the Applicant's existing Otterbourne WSW does not have sufficient water processing capability to treat the additional water arising from the Project to the required standards for the 2030s.	The Applicant is upgrading the water processing capability at Otterbourne Water Supply Works (Otterbourne WSW) to the required standards and capacity through its Capital Delivery programme, with the upgraded works planned to be commissioned and in operation in readiness for the Project.
RR-ISWI-02	RR-168, RR-354	Comments on the operational interdependence of the WRP with existing water supply infrastructure at Bedhampton Springs and Otterbourne WSW.	The Applicant and Portsmouth Water are jointly developing a commercial agreement, including operation and maintenance principles for the filling of Havant Thicket Reservoir and abstraction from the reservoir for transfer to Otterbourne WSW. The parties are working closely through established technical working groups to ensure that the design, operation and maintenance of the Project integrate with Portsmouth Water's infrastructure at Bedhampton Springs. As part of the design development, the Applicant is also working closely with its Capital Delivery and Otterbourne WSW operational teams to ensure that the Project is appropriately integrated with the existing treatment works and can operate effectively and sustainably.

Table 2-14 Summary of issues raised on the theme of land quality and ground conditions and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-LQGC-01	RR-018, RR-036, RR-095, RR-128, RR-129, RR-247,	Concerns about constructing the Water Recycling Plant (WRP), High Lift Pumping Station and associated infrastructure at the former Broadmarsh	The Applicant notes the comments regarding Broadmarsh landfill (Site 72). Broadmarsh landfill, reported as Harts Farm Way landfill in Environmental Statement (ES) Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1), is unlined and operates on the

Reference	RR references	Summary of issue raised	The Applicant's response
	RR-260, RR-298, RR-354	landfill (Site 72). Reasons for concern include unknown contaminants within the landfill.	'dilute and disperse' principle. This means that the leachate retained by the bund wall is able to migrate out of the landfill via the underlying superficial deposits and enter the groundwater, resulting in it entering the surrounding water environment. This being the case, the construction activities on and through the landfill are not considered to represent the creation of a new preferential pathway for contaminants because it is already active across the landfill. The construction activity seeks to not exacerbate the situation through implementation of measures within the Outline Construction Environmental Management Plan (CEMP) (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) such as AQ17 which involves permanently covering exposed landfill areas as soon as practicable. This would reduce the potential risk of rain infiltration, therefore reducing the risk of increased leachate generation from rainwater as well as reducing odour emissions. In addition, the Outline Foundation Works Risk Assessments – 2 of 3 and 3 of 3 [APP-418 and APP-419] have been completed specifically for the former landfill areas, and outline how the piling activities and tunnel / shaft construction will not give rise to the potential for new preferential pathways for contaminants to be created or exacerbate existing ones.
RR-LQGC-02	RR-050, RR-071, RR-095, RR-128, RR-129, RR-192, RR-260, RR-281, RR-306, RR-354	Concerns over the risk of leachate migration and contamination of Langstone Harbour (SPA, SAC, SSSI and Ramsar site) arising from construction activity on the Broadmarsh landfill.	The Applicant acknowledges the concerns regarding Broadmarsh landfill. Broadmarsh landfill, reported as Harts Farm Way landfill in ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1), is unlined and operates on the 'dilute and disperse' principle. This means that the leachate retained by the bund wall is able to migrate out of the landfill via the underlying superficial deposits and enter the groundwater, resulting in it entering the surrounding water environment. This being the case, the construction activities on and through the landfill are not considered to represent the creation of a new preferential pathway for contamination as it is already active across the landfill. The construction activity seeks to not exacerbate the situation through implementation of measures within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) such as AQ17 which involves permanently covering exposed landfill areas as soon as practicable. This would reduce the potential risk of rain infiltration, therefore reducing the risk of increased leachate generation from rainwater as well as reducing odour emissions. In addition, the Outline Foundation Works Risk Assessments – 2 of 3 and 3 of 3 [APP-418 and APP-419] have been completed specifically for the former landfill areas, and outline how the piling activities and tunnel / shaft construction will not give rise to the potential for new preferential pathways for contamination being created or exacerbating existing ones. The assessment presented in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) concludes that the measures included in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), such as WE18 (casting of piled foundations in situ) and the Outline Foundation Works Risk Assessment – 2 of 3 documents

Reference	RR references	Summary of issue raised	The Applicant's response
			[APP-418] would be sufficient to prevent significant adverse effects on water quality in Langstone Harbour during construction of the Water Recycling Plant site and Pipelines. ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1) concludes that these measures would also prevent deterioration in water body status.
RR-LQGC-03	RR-071, RR-095, RR-129, RR-354	Concerns over the risk of contaminants leaching to the underlying chalk aquifer used for public water supply through piling and tunnel shaft construction.	The Applicant acknowledges the concerns regarding contaminants leaching to the underlying chalk aquifer. The chalk aquifer underlying the WRP site and Budds Farm are both within areas of reclaimed former marine / estuary land where saline groundwater conditions are likely to be prevalent and therefore future potable abstraction is highly unlikely. The groundwater at these locations is not presently utilised for public supply. In the absence of a receptor there is no viable contaminant linkage. ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) also notes that due to the predominant southerly groundwater flow (i.e. from the hills of the South Downs in the north towards the coast in the south), impacts on sensitive receptors to the north of the WRP and tunnels (such as the Bedhampton-Havant spring complex) are likely to be limited and of a negligible magnitude of impact (the WRP site and Pipeline are not within the Source Protection Zone of the abstractions at Bedhampton). The Applicant acknowledges that, due to the proximity of the sea, there is a risk of saline intrusion as a result of the dewatering works during construction of the shafts in the WRP site and Budds Farm area. This will be a factor in the groundwater control design which will be secured through the appropriate licence and permitting regimes as set out in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). The assessment presented in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) concludes that application of the measures included in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), such as WE1 which requires the Contractor to adhere to the Environment Agency's Approach to Groundwater Protection 2018 Framework, and the Outline Foundation Works Risk Assessments – 2 of 3 and 3 of 3 documents [APP-418 and APP-419] would be sufficient to prevent significant adverse effects on water quality in the chalk principal aquifer and the secondary aquifers supported in the superficial alluvium. ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1) also concludes that these measures would prevent deterioration in the status of the groundwater body.
RR-LQGC-04	RR-128, RR-306, RR-354	Concerns over landfill gas mobilisation, including methane migration along pipelines and tunnels, presenting risks to workers, buildings and off-site receptors.	The Applicant acknowledges the concerns regarding landfill gas mobilisation. Broadmarsh landfill / Site 72, reported as Harts Farm Way landfill in ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1), operates on a 'dilute and disperse' principle with no landfill capping system. Therefore, the majority of ground gas vents directly to

Reference	RR references	Summary of issue raised	The Applicant's response
			atmosphere through the cover soils. During construction, there is an increased exposure risk to site workers, however, precautions will be undertaken to comply with the relevant health and safety legislation and guidance as secured within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). The Outline Foundation Works Risk Assessments – 2 of 3 and 3 of 3 [APP-418 and APP-419] have been completed specifically for the former Broadmarsh / Site 72 landfill area following CL:AIRE guidance 'Piling and Penetrative Ground Improvement methods on Land Affected by Contamination March 2025' to discuss how the proposed foundations will not result in increased emissions as a result of vibration or other effects from ground improvement (pollution scenario 6). As outlined in the Outline Foundation Works Risk Assessments – 2 of 3 and 3 of 3 [APP-418 and APP-419] vibration is not considered sufficient or prolonged enough to cause significant volumes of gas to migrate off site. The trenchless crossings, including the tunnels, will be constructed in the bedrock below landfill level therefore the creation of a preferential pathway for contaminants is not viable as there will be no direct or indirect contaminant linkage. Outside of the landfill area at the WRP and Budds Farm, viable ground gas source/s were not identified. This is outlined in the Outline Foundation Works Risk Assessments - 3 of 3 documents [APP-419] which was completed for the wider Project.
RR-LQGC-05	RR-129, RR-306, RR-354	Concerns over the risk of leachate contamination of the Hermitage Stream from construction on the Broadmarsh landfill.	The Applicant acknowledges the concerns regarding the risk of leachate contamination of the Hermitage Stream from construction on the Broadmarsh landfill. Broadmarsh landfill, reported as Harts Farm Way landfill in ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1), is unlined and operates on the 'dilute and disperse' principle. This means that the leachate retained by the bund wall is able to migrate out of the landfill via the underlying superficial deposits and enter the groundwater, resulting in it entering the surrounding water environment. This being the case, the construction activities on and through the landfill are not considered to represent the creation of a new preferential pathway for contamination because it is already active across the landfill. The construction activity seeks to not exacerbate the situation through implementation of environmental measures within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) such as AQ17 which involves permanently covering exposed landfill areas as soon as practicable. This would reduce the potential risk of rain infiltration, therefore reducing the risk of increased leachate generation as well as reducing odour emissions. In addition, the Outline Foundation Works Risk Assessments – 2 of 3 and 3 of 3 [APP-418 and APP-419] have been completed specifically for the former landfill areas, and outline how the piling activities and tunnel / shaft construction will not give rise to the potential for new preferential pathways for contamination to be created or exacerbate existing ones.

Reference	RR references	Summary of issue raised	The Applicant's response
			The assessment presented in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) concludes that the measures included in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3)and the Outline Foundation Works Risk Assessment – 2 of 3 documents [APP-418] would be sufficient to prevent significant adverse effects on water quality in Hermitage Stream and Langstone Harbour during construction of the Water Recycling Plant site and Pipelines. ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1) concludes that these measures would also prevent deterioration in water body status.
RR-LQGC-06	RR-129, RR-266, RR-306, RR-354	Concerns that the proposed piling methods (including continuous flight auger piles) cannot adequately seal the unlined landfill and cannot eliminate new contamination pathways.	The Applicant acknowledges the concerns that the proposed piling methods cannot adequately seal the unlined landfill and cannot eliminate new contamination pathways. An Outline Foundation Works Risk Assessment – 2 of 3 documents [APP-418] has been completed specifically for the former landfill areas following CL:AIRE guidance 'Piling and Penetrative Ground Improvement methods on Land Affected by Contamination March 2025' to discuss how the proposed foundations (including continuous flight auger piles) will not have an adverse impact by creating new pathways for the migration of contamination. As identified in paragraph 4.7.4 of the Outline Foundation Works Risk Assessment – 2 of 3 documents [APP-418] the landfill is unlined and operates on the 'dilute and disperse' principle, and leachate retained by the bund wall is able to migrate out of the landfill via the underlying superficial deposits and enter the groundwater resulting in it entering the surrounding water environment. This being the case, the construction of the piles through the landfill and into the natural strata is not considered to represent the creation of a new preferential pathway for contamination because it is already active across the landfill and the Project seeks not to exacerbate the situation. In relation to ground gas, continuous flight auger piles are solid, therefore new ground gas pathways would not be created, as discussed in the Outline Foundation Works Risk Assessment – 2 of 3 documents [APP-418].
RR-LQGC-07	RR-354	Concerns over the risk of releasing pungent odours from opening and excavating the landfill during site levelling and tunnel shaft construction.	The Applicant notes the comments regarding risk of releasing pungent odours from opening and excavating the landfill during site levelling and tunnel shaft construction. The approach undertaken in relation to the assessment of construction phase odour considered an area of worst-case risk at the site of the WRP. A qualitative odour risk assessment has been undertaken within ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1) in accordance with the Institute of Air Quality Management guidance on the assessment of odour for planning. As part of this assessment, receptors downwind of the prevailing wind direction relative to the WRP were considered, including residential dwellings and the adjacent business park. Good practice mitigation measures to control odour were identified as appropriate to the construction activities for the Project, including specific

Reference	RR references	Summary of issue raised	The Applicant's response
			measures at the WRP site in relation to potential disturbance to the historic landfill. These commensurate odour control measures are detailed within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) (AQ16 which involves material damping down, misting or other similar measures and AQ17 which involves permanently covering exposed landfill areas as soon as practicable). With these measures in place the risk of odour exposure is reduced. The assessment presented in ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1) concluded that there would be no significant odour effects on human receptors as a result of the excavation of the historical landfill site during the construction of the WRP.
RR-LQGC-08	RR-354	Concerns over rainwater infiltration and oxygen ingress re-activating waste degradation processes, increasing gas, odour and leachate generation.	The Applicant acknowledges the concerns regarding rainwater infiltration and oxygen ingress re-activating waste degradation processes, increasing gas, odour and leachate generation. Harts Farm Way landfill is unlined and operates on a 'dilute and disperse' principle with no landfill capping system. Therefore, rainwater is currently able to infiltrate into the landfill. The proposed construction methodologies for the Project seek to not exacerbate the situation through implementation of the environmental measures outlined in Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). Environmental measures include, for example, AQ17 which involves permanently covering exposed landfill areas as soon as practicable. This would reduce the potential risk of rain infiltration and oxygen therefore reducing the risk of increased leachate, ground gas and odour during the construction process. The assessments presented in ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1) and ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1) concluded that, with mitigation measures in place, there would be no significant effects in relation to gas, odour or leachate generation as a result of the construction of the Project.
RR-LQGC-09	RR-354	Concerns over the effect of tidal influence on the landfill gas regime, making it more difficult to classify and mitigate.	The Applicant acknowledges the concerns over the effect of tidal influence on the landfill gas regime. As discussed in ES Appendix 11.2 Geotechnical and geo-environmental reports ([APP-162] – for document 12 of 18 documents), a ground gas risk assessment based on site specific monitoring data was undertaken for the Water Recycling Plant (WRP) site in order to establish the ground gas regime. The assessment provided within ES Appendix 11.2 Geotechnical and geo-environmental reports ([APP-162] – for document 12 of 18 documents) concluded that due to the ground gas monitoring results, the WRP site is to be designated as a Characteristic Situation 3 and that ground gas protection measures would be required. Examples of the mitigation measures applicable to a Characteristic Situation 3 are provided within ES Appendix 11.2 Geotechnical and geo-environmental reports ([APP-162] – for document 12 of 18 documents), and the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). The mitigation

Reference	RR references	Summary of issue raised	The Applicant's response
			measures related to Characteristic Situation 3 are considered to be robust for the Project and consider the potential for tidal influence.
RR-LQGC-10	RR-354	Concerns over ongoing ground settlement, void creation and instability at the Broadmarsh landfill, including damage to pipes and services and new pathways for gas and leachate.	Ground settlement and the potential creation of pathways for gas or leachate migration have been considered within the Project design and construction planning. Environmental measure WE3, as outlined in Table 5-1 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) requires a Voids Treatment Protocol to be developed and agreed with the Environment Agency, setting out how any voids encountered within the chalk during construction will be identified and treated to avoid impacts on groundwater flow or quality. In addition, the ES Appendix 19.9 Outline Water Monitoring Plan [APP-204] requires a watching brief during construction to identify any previously unknown dissolution features or voids within the chalk. For tunnelled sections, the annulus around the tunnel is continuously grouted as part of the construction process. This prevents the formation of new preferential pathways that could otherwise enable groundwater, gas, leachate or contaminants to migrate. As a result, the risk of settlement-related pathways developing as a consequence of the tunnel works is considered to be low. Long-term settlement of the WRP could arise from degradation of pile material due to extended contact with contaminated soil, leachate or groundwater, as highlighted in the Outline Foundation Works Risk Assessment - 2 of 3 documents [APP-418]. The consequence of contamination, given the nature of the source (High - 4) and sensitivity of the receptor (High - 4) is assessed as Medium. Assuming the use of an appropriate concrete mix, the probability of degradation of in-ground concrete due to attack by aggressive chemicals, hydrocarbons or naturally occurring sulphates and acids is assessed to be Unlikely. By combining a Medium consequence and Unlikely probability, as set out in Table 4-5 of the Outline Foundation Works Risk Assessment - 2 of 3 documents [APP-418], the associated risk of degradation of pile materials and the creation of new pathways is assessed to be Low. Accordingly, the associated risk of long-term settlement of the WRP is also considered to be Low.
RR-LQGC-11	RR-177	Comments on the historical refusal of a planning application for Clay Extraction, Landfill and Waste Recycling Facility near the Havant Thicket Reservoir site (No. F522954/10C in 19974) due to the potential contamination risk posed to the surrounding groundwater.	The Applicant acknowledges the comments relating to historical refusal of a planning application for clay extraction, landfill and waste recycling facilities near to the Havant Thicket Reservoir site and the reasons for the previous refusal. Unlike the previous planning applications which were refused, there will be no pathway by which the recycled water can interact with the surrounding groundwater as the recycled and the spring water in the reservoir will be contained within Havant Thicket Reservoir. In addition, it will have undergone advanced treatment techniques to convert the treated water into purified recycled water at the water recycling treatment plant to render it suitable for its storage in the reservoir. This treatment involves the treated water being pumped through two filtering processes. The first of these, micro-filtration, is to remove remaining impurities that could block the membranes during reverse

Reference	RR references	Summary of issue raised	The Applicant's response
			osmosis. The reverse osmosis process removes dissolved ions, phosphorus, impurities, bacteria and pharmaceuticals. The next stage within the water recycling process would be the advanced oxidation process involving the use of ultraviolet light and hydrogen peroxide to break down any remaining impurities. To ensure the water is stable for onward pumping and blending, minerals such as calcium and magnesium salts removed during the earlier stages of treatment would be added back in. Further details are provided in ES Chapter 3 Description of the Proposed Development [APP-082].
RR-LQGC-12	RR-129, RR-354	Concerns that decommissioning of below-ground infrastructure at the Broadmarsh landfill has not been assessed, including long-term risks of site settlement, void collapse and new pathways for leachate and landfill gas.	Decommissioning of below-ground infrastructure at the Broadmarsh landfill (reported as Harts Farm Way landfill in ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1)), has been assessed in paragraphs 11.8.252 to 11.8.272 of ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1), which includes an assessment of the potential impacts to land quality and ground conditions receptors during the decommissioning phase of the Project. The assessment for the decommissioning phase of the Project assumed that, following the end-of-life cycle, buried pipeline infrastructure would be left in situ, drained, capped and potentially grouted depending on industry good practices at the time. An assessment of the potential impacts associated with the decommissioning of the Project, including buried pipeline infrastructure, concluded that there would be no significant effects following the implementation of mitigation measures which are anticipated to be similar in nature to measures contained within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). Consent for the decommissioning of the infrastructure associated with the Water Recycling Plant site is not being sought as part of the DCO application and this would be sought at the time of decommissioning. The condition of the infrastructure associated with the Project will be reviewed at the end of their expected life, which for the Water Recycling Plant itself is 60 years. Given that the landfill ceased accepting waste in the 1980s, the passage of time and ongoing waste degradation processes will mean that leachate and landfill gas generation are expected to have reduced to negligible levels, such that these long-term risks will no longer be of material concern. The Project will be designed to accommodate the conditions of building on a former landfill site, i.e. suitable foundation solutions and pavement solutions to negate the long-term risks to below ground structures in relation to settlement and/or void collapse as outlined in, for example, the Outline Foundation Works Risk Assessment – 2 of 3 documents [APP-418].
RR-LQGC-13	RR-129, RR-306, RR-354	Suggestions that construction effects at Site 72 should be treated as a Principal Issue and examined at an Issue Specific Hearing on ground contamination and leachate.	The Applicant acknowledges the concerns regarding construction on Site 72 (reported as Harts Farm Way landfill in ES)Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1)). The assessment process of assessing the sites suitability in relation to ground contamination issues (which includes leachate) is discussed in ES Appendix 11.2 Geotechnical and geo-environmental reports ([APP-162] – for document

Reference	RR references	Summary of issue raised	The Applicant's response
			12 of 18 documents). The application documents discuss the source-pathway-scenario with a pictorial diagram of potential and active pollutant linkages shown within the additional technical note supplied to Havant Borough Council, (ES Appendix 11.1 Response to Havant Borough Council Environmental Control Officer [APP-150]). It is for the Examining Authority to determine the matters requiring Issue Specific Hearings. However, the Applicant would like to reiterate that documentation has been produced to show that in relation to contamination risks (including leachate migration), the site is developable for its intended end use without it causing a significant effect to the surrounding environment through the implementation of appropriate mitigation measures. Appropriate mitigation measures identified include, for example, implementation of permanently covering exposed landfill areas as soon as practicable as secured within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). In addition, the Outline Foundation Works Risk Assessments – 2 of 3 and 3 of 3 [APP-418 and APP-419] have been completed specifically for the former landfill areas, and outline how the piling activities and tunnel / shaft construction will not give rise to the potential for new preferential pathways for contamination being created or exacerbating existing ones.
RR-LQGC-14	RR-354	Concerns that the pipeline routes and tunnels connecting to Site 72 will open up multiple migration pathways for landfill gas and leachate off-site, including risks of explosion in confined spaces.	The Applicant acknowledges the concerns regarding Site 72 (reported as Harts Farm Way landfill in ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1)). Site 72 is connected to the wider Project via trenchless crossings / tunnelling methodologies sealed within the solid underlying geology beneath the landfill. There is an absence of a viable route by which a new migration pathway would be opened up for either the migration of ground gas or leachate. A shaft will be sunk through the landfill, underlying superficial geology and into the bedrock. The shaft is the only viable route by which a preferential pathway for contaminants and ground gas could be created, and this is discussed in the Outline Foundation Works Risk Assessments – 2 of 3 and 3 of 3 [APP-418 and APP-419] which have been completed specifically for the former landfill areas. The risk assessments discuss how the piling activities and tunnel / shaft construction will not give rise to the potential for new preferential pathways for contaminants and ground gas to be created or exacerbate existing ones. If there is no risk of preferential pathway creation, there is no risk of ground gas migrating off site and causing an explosion in a confined space off site due to the absence of a contaminant linkage.
RR-LQGC-15	RR-354	Concerns that proposed mitigation and enhancement measures are inadequate to offset the increased risk of leachate migration to Langstone Harbour from Broadmarsh landfill construction.	The Applicant acknowledges the concerns regarding the proposed mitigation and enhancement measures. Broadmarsh landfill, reported as Harts Farm Way landfill in ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1), is unlined and operates on the 'dilute and disperse' principle, and leachate retained by the bund wall is able to migrate out of the landfill via the underlying superficial deposits and enter the groundwater resulting in it entering the surrounding water environment. This being the case, the construction activities on and through the landfill are not

Reference	RR references	Summary of issue raised	The Applicant's response
			considered to represent the creation of a new preferential pathway for contaminants because it is already active across the landfill. The construction activity seeks to not exacerbate the situation through implementation of measures within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) which are considered to be appropriate by the Applicant for the Project. In addition, the Outline Foundation Works Risk Assessments – 2 of 3 and 3 of 3 [APP-418 and APP-419] have been completed specifically for the former landfill areas and outline how the piling activities and tunnel / shaft construction will not give rise to the potential for new preferential pathways for contaminants to be created or exacerbate existing ones. The assessment presented in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) concludes that the measures included in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), such as WE18 (casting of piled foundations in situ), and the Outline Foundation Works Risk Assessment – 2 of 3 documents [APP-418] would be sufficient to prevent significant adverse effects on water quality in Hermitage Stream and Langstone Harbour as a result of leachate migration during construction of the Water Recycling Plant and Pipelines. ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1) concludes that these measures would also prevent deterioration in water body status.

Table 2-15 Summary of issues raised on the theme of land use and agriculture and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-LUA-01	RR-006, RR-023, RR-099, RR-100, RR-132, RR-179, RR-181, RR-193, RR-210, RR-226, RR-282, RR-285, RR-299	Concerns over the loss, reduction and fragmentation of established grazing land used by livery yards, private horse owners and equestrian properties along the pipeline route.	The Applicant acknowledges concerns regarding the temporary loss, reduction and fragmentation of established grazing land used by livery yards, private horse owners and equestrian properties along the pipeline route. 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 may be temporarily taken out of agricultural use. Following installation of the pipeline and completion of construction, the land would be reinstated to its pre-existing agricultural use in accordance with the Outline Soil Resource Management Plan (SRMP), contained within the Outline Construction Environmental Management Plan (CEMP) (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). The assessment of agricultural land use specifically considers impacts arising from disruption to movements of livestock, loss of access or boundary features, disruption to water supplies and drainage systems, 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), include maintaining access for landowners and occupiers, incorporating stiles,

Reference	RR references	Summary of issue raised	The Applicant's response
			gates or gaps within temporary fencing where reasonably practicable, and providing additional access points across the construction working width where reasonably practicable to mitigate field severance. These measures are intended to minimise disruption to agricultural and grazing activities during construction and to maintain the continued operation of affected holdings, where reasonably practicable. Commitment LUA6 states where grazing land is severed, the Contractor will ensure that troughs, standpipes or field supplies located within the working area are moved to a new temporary or agreed permanent location, 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] concludes that construction may result in temporary impacts on agricultural land use; however, these effects would generally be short-term and temporary in nature, with land over the pipeline being reinstated following construction. Permanent losses of agricultural land are largely restricted to the Above Ground Plant (AGP) sites which are of limited spatial scope (less than five hectares combined) and none of the AGP sites are located on equestrian properties. As a result, effects on agricultural land use are minor adverse and considered to be not significant. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) requires ongoing engagement with affected landowners and occupiers throughout construction. Commitment LUA5 within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) provides that where agricultural business operations, land use activities or other functions linked to affected land are affected or interrupted, compensation is payable in accordance with the relevant provisions of the Development Consent Order (DCO) and the statutory Compensation Code. Commitment LUA6 further provides that, where grazing land is severed, troughs, standpipes or field supplies within the working area will be moved to a new temporary or agreed permanent location.
RR-LUA-02	RR-006, RR-023, RR-100, RR-132, RR-179, RR-181, RR-193, RR-285	Concerns that reduced grazing will prevent field rotation and rest, leading to overgrazing, soil poaching, loss of forage and unsafe ground conditions for horses.	The Applicant acknowledges concerns regarding the potential effects of the Project on equestrian land uses, including grazing land used by private horse owners and livery businesses. The Applicant recognises that temporary restrictions on the availability of grazing land may affect how land is managed during construction. As set out in ES Chapter 12 Land use and agriculture [APP-091], agricultural land temporarily required during construction would be reinstated following completion of the works and returned to its pre-existing agricultural use through the appropriate handling, storage and reinstatement of soils in accordance with the Outline SRMP contained within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3).

Reference	RR references	Summary of issue raised	The Applicant's response
			The assessment considers temporary and permanent impacts on agricultural land use, including disruption to movements of livestock, loss of access or boundary features, disruption to water supply and drainage systems, 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) include maintaining access for landowners and occupiers, providing additional access points across the construction working width where reasonably practicable to mitigate field severance, and relocating troughs, standpipes or field supplies where grazing land is severed. The assessment concludes that the temporary use of agricultural land would be short-term and temporary in nature, with land reinstated following construction. As a result, effects on agricultural land use would be minor adverse and not significant. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) requires ongoing engagement with affected landowners and occupiers throughout construction. Commitment LUA5 provides that where agricultural business operations, land use activities or other functions linked to affected land are affected or interrupted, compensation is payable in accordance with the relevant provisions of the DCO and the statutory Compensation Code.
RR-LUA-03	RR-006, RR-023, RR-100, RR-132, RR-179, RR-181, RR-193, RR-210, RR-226, RR-285, RR-299	Concerns over direct impacts on horse welfare arising from reduced turnout, movement and grazing, including risks of equine grass sickness and mud fever.	The Applicant acknowledges concerns regarding the likely significant effects of the Project on horse welfare arising from reduced turnout and grazing due to some available land being occupied by construction activities. The Applicant acknowledges concerns regarding the health and welfare of horses associated with temporary restrictions on grazing land and turnout. While specific veterinary effects on individual horses were not separately assessed within the ES Chapter 12 Land use and agriculture [APP-091], as this is outside the expertise of the Land Use and Agriculture discipline, the assessment considers the effects of temporary land take, access restrictions and changes in the operating environment on equestrian land uses and agricultural holdings. 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 of the pipeline and completion of construction, the land would be restored to its pre-existing agricultural use through appropriate handling, storage and reinstatement of soils in accordance with the Outline SRMP, 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 assessment considers temporary and permanent impacts on agricultural land use, including disruption to movements of livestock, loss of access, disruption to water supply and drainage systems, and severance of agricultural fields, that would also apply to land used for grazing horses. Commitments secured through the Outline CEMP (Document reference 7.1, DCO Volume 7,

Reference	RR references	Summary of issue raised	The Applicant's response
			Version 1 for document 1 of 3) include maintaining access for landowners and occupiers, providing additional access points across the construction working width where reasonably practicable to mitigate field severance, and relocating troughs, standpipes or field supplies where grazing land is severed. The assessment concludes that the temporary use of agricultural land would be short-term and temporary in nature, with land reinstated following construction. The ES concludes that effects on agricultural land use would be minor adverse and not significant. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) also includes ongoing engagement with affected landowners and occupiers throughout construction. Where it is determined that agricultural business operations, land use activities or other functions linked to affected land would be affected or interrupted, compensation is payable in accordance with the relevant provisions of the DCO and the statutory Compensation Code. The Applicant will continue to engage with affected landowners, occupiers and operators regarding the practical management of construction activities and measures to minimise disruption where reasonably practicable.
RR-LUA-04	RR-023, RR-132, RR-193, RR-282, RR-299	Concerns that horses with existing medical conditions and retired or elderly horses requiring 24-hour turnout, will be disproportionately affected and cannot readily be relocated.	The Applicant acknowledges the concerns raised regarding horses with existing medical conditions, retired horses, and horses that may require specialist management arrangements, including continuous access to grazing land. ES Chapter 12 Land use and agriculture [APP-091] identifies equestrian centres as receptors that may experience temporary and short-term impacts due to construction activity. A desk-based assessment was undertaken for equestrian centre receptors and concluded that temporary loss of land, potential access disruption and changes to the operating environment could occur during construction. These receptors were assessed as having low sensitivity, with a moderate adverse magnitude of impact, resulting in a minor adverse effect that is not significant. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) includes measures to maintain access and mitigate field severance where reasonably practicable, including the provision of access points across the construction working width by agreement with the landowner or occupier. The Applicant will continue to engage with affected landowners, occupiers and operators regarding the practical management of construction activities and measures to minimise disruption where reasonably practicable.
RR-LUA-05	RR-006, RR-099, RR-181, RR-193	Concerns over the lack of suitable alternative livery and grazing provision in the local area, with several yards recently closing, and the cumulative impact on displaced horse owners.	The Applicant acknowledges the concerns raised regarding the potential effects of construction activities on equestrian facilities and grazing land, including concerns relating to the availability of alternative livery and grazing provision. ES Chapter 12 Land use and agriculture [APP-091] identifies a number of equestrian and outdoor activity receptors within the study area. The

Reference	RR references	Summary of issue raised	The Applicant's response
			assessment identifies that equestrian facilities could experience temporary and short-term impacts arising from construction activity. These receptors are assessed as having low sensitivity, with a moderate magnitude of impact due to the temporary loss of land, potential impacts on access arising from traffic delays and a temporary change in the operating environment, resulting in a minor adverse effect, which is not significant. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) includes measures to maintain access and mitigate field severance where reasonably practicable, including the provision of access points across the construction working width by agreement with the landowner or occupier. The Applicant will continue to engage with affected landowners, occupiers and operators regarding the practical management of construction activities and measures to minimise disruption where reasonably practicable.
RR-LUA-06	RR-006, RR-193, RR-226	Concerns over the additional financial burden on horse owners and threats to the viability of livery yards, including increased feed and livery costs and potential business closure.	The Applicant acknowledges concerns regarding the potential effects of the Project on livery yard operations and horse owners, including concerns relating to increased costs, potential disruption to business operations and the availability of grazing land and livery provision during construction ES Chapter 12 Land use and agriculture [APP-091] identifies a number of equestrian and outdoor activity receptors within the study area. The assessment considers equestrian centres that could experience temporary and short-term impacts due to construction activity. A desk-based assessment undertaken for equestrian centre receptors concludes that these receptors could experience temporary and short-term impacts arising from construction activity. These receptors are assessed as having low sensitivity, with a moderate magnitude of impact due to the temporary loss of land, potential impacts on access arising from traffic delays and a temporary change in the operating environment, resulting in a minor adverse effect, which is not significant. The Applicant will continue to engage with affected landowners, occupiers and operators regarding the practical management of construction activities and measures to minimise disruption where reasonably practicable. Where it is determined that agricultural business operations, land use activities or other functions linked to affected land would be affected or interrupted, compensation is payable in accordance with the relevant provisions of the DCO and the statutory Compensation Code.
RR-LUA-07	RR-132, RR-226, RR-285	Concerns over construction-phase disruption to livery yard operation, including noise, machinery, fencing and large vehicles creating an environment incompatible with keeping horses.	The Applicant acknowledges the concerns raised regarding potential disruption to livery yard operations during construction, including the presence of construction machinery, fencing, large vehicles and the potential effects on horses. Noise and vibration effects associated with construction of the Project have been assessed in Environmental Statement ES Chapter 15 Noise and vibration [APP-094], including the potential effects of airborne noise, ground-borne noise, vibration and construction traffic noise. The Outline CEMP

Reference	RR references	Summary of issue raised	The Applicant's response
			(Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) secures a range of best practicable means measures to manage noise and vibration during construction. These include scheduling works, where practicable, to reduce noise and vibration emissions at highly sensitive times, selecting plant and working methods that reduce noise and vibration emissions, locating noisy equipment to reduce noise levels at sensitive receptors, avoiding multiple noisy activities occurring close to receptors at the same time, and providing acoustic screening and enclosures where required. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) also commits that a Noise and Vibration Management Plan (NVMP) will be prepared. ES Chapter 15 Noise and vibration [APP-094], concludes that, with the mitigation measures secured through the Outline CEMP and NVMP, residual construction noise and vibration effects would be no worse than minor adverse and not significant. ES Chapter 12 Land use and agriculture [APP-091] recognises that agricultural land would be temporarily required during construction. The assessment specifically considers impacts arising from disruption to movements of livestock, loss of access or boundary features, disruption to water supplies and drainage systems, and severance of agricultural fields. Commitment 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, where reasonably practicable, access points will be provided across the construction working width to mitigate field severance. Commitment LUA6 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) further provides that, where grazing land is severed, the Contractor will ensure that troughs, standpipes or field supplies located within the working area are moved to a new temporary or agreed permanent location. Following installation of the pipeline and completion of construction, land would be reinstated to its pre-existing agricultural use in accordance with the Outline SRMP contained within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). Commitment LUA1 requires the Contractor to prepare and adhere to a detailed SRMP for the management, handling and reinstatement of soils. The assessment concludes that construction may result in temporary impacts on agricultural land use; however, these effects would generally be short term and temporary in nature, with land reinstated following construction. As a result, effects on agricultural land use are considered to be minor adverse and not significant. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) also requires ongoing engagement with affected landowners and occupiers throughout construction. Commitment LUA5 provides that where agricultural business operations, land use activities or other functions

Reference	RR references	Summary of issue raised	The Applicant's response
			linked to affected land are affected or interrupted, compensation is payable in accordance with the relevant provisions of the DCO and the statutory Compensation Code.
RR-LUA-08	RR-006, RR-034, RR-193, RR-226, RR-331	Concerns over damage to soil integrity, compaction, drainage and pasture quality, including the loss of specific soil characteristics that individual horses depend on for welfare, and requests for guarantees on reinstatement, timescales and long-term restoration of the land to safe and sustainable use.	All soil handling will be undertaken in accordance with good practice principles set out in the Outline SRMP, which is provided at Appendix B of the Outline Construction Environmental Management Plan CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). The Outline SRMP 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, and includes measures relating to soil handling, storage and reinstatement to minimise the risk of damage to soils during construction. The Outline SRMP contained within 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 Outline SRMP contained within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) confirms at paragraph B.2.16 that an Agricultural Liaison Officer (ALO) will be appointed and will be responsible for: undertaking and preparing a Record of Condition to capture the condition of the land prior to commencement of construction; coordinating surveys of agricultural field drains; undertaking site inspections to monitor working practices and ensure that the SRMP is being adhered to; and agreeing reinstatement measures between the landowner and the Contractor. The Applicant cannot provide an absolute guarantee that every individual characteristic of the land will remain unchanged. However, the measures within the detailed SRMP and the post-Construction Drainage Plan will ensure that land and soil is reinstated to a similar condition to their pre-construction condition and that they can continue to perform the same functions as before, as noted in ES Chapter 12 Land use and agriculture [APP-091]. The ALO will be appointed for up to one year post-construction. Paragraph B.10.5 of the Outline SRMP notes that any defects on reinstated land identified and agreed between the landowner, Contractor and ALO will be ameliorated by the Contractor prior to handing back the land.
RR-LUA-09	RR-193, RR-285	Suggestions that impacts should be assessed by reference to the actual use of the land and the horses dependent on it, rather than the physical footprint of the pipeline alone.	The Applicant acknowledges the request for the assessment to consider the way in which the affected land is used by the equestrian facility, rather than solely the physical footprint of the Pipeline. ES Chapter 12 Land use and agriculture [APP-091] considers the likely significant effects on equestrian centres arising from temporary loss of land, potential access disruption and changes to the operating environment. It concludes that the identified effects would be temporary and short-term, resulting in a minor adverse effect that would not be significant. The Applicant

Reference	RR references	Summary of issue raised	The Applicant's response
			will continue to engage with affected owners and operators regarding the use of the land and the practical measures that may reduce disruption during construction. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) includes a commitment that the Contractor will proactively engage with affected landowners, occupiers and operators, undertake engagement as early as reasonably practicable, minimise disruption where practicable, and facilitate discussions regarding timing, sequencing and alternative arrangements.
RR-LUA-10	RR-193, RR-285	Requests that permission be refused unless the Applicant demonstrates no reasonable alternative route or construction method that would avoid loss of grazing, and that robust conditions be imposed if consent is granted.	The Applicant acknowledges that the temporary loss of grazing land during construction is a concern raised by respondents. As assessed in ES Chapter 12 Land use and agriculture [APP-091], the majority of land required for the pipeline would be subject to temporary possession only and would be reinstated following construction. Measures secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and the Outline Soil Resource Management Plan are intended to enable agricultural activities, including grazing, to resume following reinstatement. Where grazing land is severed the Contractor will ensure that troughs, standpipes or field supplies located within the working area are moved to a new, temporary or agreed permanent location. The assessment concludes that impacts on agricultural land use would be temporary and short-term and would result in a minor adverse effect that is not significant. The Applicant's response to RR-LUA-07 explains how a majority of the land use requirement is temporary and short-term, how disruption to agricultural activity including grazing will be minimised, and how land will be reinstated in order that agricultural uses will be able to resume. The Applicant does not agree that development consent should be refused on this basis. The development and refinement of the Pipeline alignment, including the consideration of reasonable alternatives and construction methods, is described in the Scheme Development Report [APP-073 to APP-075 – 3 documents] and ES Chapter 4 Consideration of alternatives [APP-083]. The selected alignment reflects consideration of engineering, environmental, land use and community factors. Measures to avoid or reduce effects during construction are secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and will be developed further through the detailed CEMP(s) and associated management plans that will be prepared in accordance with the requirements in Schedule 2 to the draft DCO [APP-023].
RR-LUA-11	RR-331	Concerns that open-cut trenching through London Clay areas will permanently damage agricultural soil integrity and cause deep-seated compaction rendering land unusable for years.	All soil handling will be undertaken in accordance with good practice principles set out in the Outline 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). The Outline SRMP contained within the Outline CEMP 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, and

Reference	RR references	Summary of issue raised	The Applicant's response
			includes measures relating to soil handling, storage and reinstatement to minimise the risk of damage to soils during construction. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) includes measure WE4, relating to the implementation of a post-Construction Drainage Plan, confirming the purpose of which 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 measures of the SRMP and the post-Construction Drainage Plan will ensure that land and soil is reinstated to a similar condition to their pre-construction condition and that they can continue to perform the same functions as before, as noted in ES Chapter 12 Land use and agriculture [APP-091]. The Outline SRMP contained within 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 ALO will be appointed and will be responsible for: undertaking and preparing a Record of Condition to capture the condition of the land prior to commencement of construction; coordinating surveys of agricultural field drains; undertaking site inspections to monitor working practices and ensure that the SRMP is being adhered to; and agreeing reinstatement measures between the landowner and the Contractor. By following the good practice principles of the Outline SRMP contained within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), such as soil only being tracked with machinery under suitable soil moisture and weather conditions, and no trafficking of vehicles/plant or materials storage occurring on reinstated soil, compaction will be minimised. Where defects are identified and are agreed between the landowner, ALO and the Contractor, these will be ameliorated by the Contractor before the land is handed back. As confirmed in paragraph B.2.15, the ALO will remain appointed for up to one year post construction in order to manage remediation issues.
RR-LUA-12	RR-006	Concerns over the effect of construction works on agricultural soil quality, fertility, drainage and long-term usability of land.	The Applicant acknowledges the concerns raised regarding the potential effects of construction works on agricultural soil quality, fertility, drainage and the long-term usability of agricultural land. All soil handling will be undertaken in accordance with good practice principles set out in the Outline 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). The Outline SRMP also provides that soils above the pipeline will be reinstated as soon as reasonably practicable following installation. The timing and management of reinstatement will be agreed with the landowner, and measures will be implemented to minimise disruption to agricultural activities. Following reinstatement, land will be returned to agricultural use in accordance with the principles set out in the SRMP. The Outline SRMP contained within 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 (ALO) will be appointed and will be

Reference	RR references	Summary of issue raised	The Applicant's response
			responsible for: undertaking and preparing a Record of Condition to capture the condition of the land prior to commencement of construction; coordinating surveys of agricultural field drains; undertaking site inspections to monitor working practices and ensure that the SRMP is being adhered to; and agreeing reinstatement measures between the landowner and the Contractor. The ALO will be appointed for up to one year post-construction during which time they may be contacted about any longer-term defects identified. Furthermore, the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) includes measure WE4, relating to the implementation of a post-Construction Drainage Plan, confirming the purpose of which is to restore the soil structure and drainage status to at least the same condition as recorded prior to commencement of the construction works. In this way, any effects on the long-term usability of reinstated land will be minimised.
RR-LUA-13	RR-226, RR-282, RR-299	Concerns that, where suitable alternative accommodation cannot be found, owners may be forced into decisions to euthanise horses, particularly elderly horses, with profound emotional consequences for owners.	The Applicant acknowledges the concern that, if suitable alternative accommodation for horses could not be secured, horse owners may face difficult decisions regarding the future care of their animals. The EIA includes an assessment of Ash House Farm Equestrian Centre in Environmental ES Chapter 12 Land use and agriculture [APP-091], Section 12.8. Ash House Farm is identified as an equestrian/outdoor activities business in Section J. As part of the assessment of equestrian-centre receptors, it was assigned a low sensitivity due to the nature of the activities undertaken, with a moderate adverse magnitude of impact arising from the potential temporary loss of land, traffic-related delays affecting access and potential changes to the operating environment. This results in an overall minor adverse effect, which is not significant. That assessment notwithstanding, and taking into account subsequent relevant representations, the Applicant acknowledges that Ash House Farm Livery Yard is an established equestrian business, recognises that the temporary occupation of land within the construction working width, and that the associated loss of or disruption to that land during construction, could have implications for the operation and viability of the business during construction and for a period thereafter whilst land is reinstated. The Applicant further recognises that, due to the nature of the business and the need to provide continuous care for horses kept on site, accommodating horses during construction may present particular challenges. The Applicant will seek to engage further to better understand the effect of the temporary construction on the overall business, and to explore how best 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 detailed design once the Applicant can confirm the final working areas required The Applicant will continue to engage with the landowners and occupiers on the difficulties they may encounter during construction activities. If mitigation is not reasonably practicable, then the Applicant confirms that compensation will

Reference	RR references	Summary of issue raised	The Applicant's response
			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-LUA-14	RR-132	Concerns over the stress, anxiety and mental-health consequences for horse owners arising from uncertainty over the pipeline and the prospect of losing access to grazing or having to relocate horses.	The Applicant acknowledges the concerns raised regarding stress, anxiety and uncertainty experienced by horse owners in relation to potential temporary impacts on grazing land and the possible need to relocate horses during construction. ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1) recognises that wellbeing and mental health form an important component of health and that changes to access, disruption to activities and uncertainty associated with construction can contribute to stress and anxiety for some individuals. The assessment identifies that indirect health impacts can arise where disruption affects access to facilities, recreation and established activities, and specifically recognises that stress and anxiety can result from temporary disruption and changes to a person's normal environment. The Environmental Impact Assessment includes an assessment of Ash House Farm Equestrian Centre in ES Chapter 12, Land use and agriculture [APP-091] Section 12.8. Ash House Farm is identified as an equestrian/outdoor activities business in Section J. As part of the assessment of equestrian-centre receptors, it was assigned a low sensitivity due to the nature of the activities undertaken, with a moderate adverse magnitude of impact arising from the potential temporary loss of land, traffic-related delays affecting access and potential changes to the operating environment. This results in an overall minor adverse effect, which is not significant. That assessment notwithstanding, and taking into account subsequent relevant representations, the Applicant acknowledges that Ash House Farm Livery Yard is an established equestrian business, recognises that the temporary occupation of land within the construction working width, and that the associated loss of or disruption to that land during construction, could have implications for the operation and viability of the business during construction and for a period thereafter whilst land is reinstated. The Applicant further recognises that, due to the nature of the business and the need to provide continuous care for horses kept on site, accommodating horses during construction may present particular challenges. The Applicant will seek to engage further to better understand the effect of the temporary construction on the overall business, and to explore how best 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 detailed design once the Applicant can confirm the final working areas required The Applicant will continue to engage with the landowners and occupiers on the difficulties they may encounter during construction activities. If mitigation is

Reference	RR references	Summary of issue raised	The Applicant's response
			not reasonably practicable, then 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-LUA-15	RR-132, RR-299	Concerns that reduced or fragmented grazing will disrupt established herd groups and long-standing routines, with difficulty finding alternative accommodation for horses currently kept together.	The Applicant acknowledges concerns regarding the potential disruption to established grazing arrangements and the practical difficulties associated with accommodating horses where grazing land is temporarily affected during construction. The EIA includes an assessment of Ash House Farm Equestrian Centre in ES Chapter 12, Land use and agriculture [APP-091] Section 12.8. Ash House Farm is identified as an equestrian/outdoor activities business in Section J. As part of the assessment of equestrian-centre receptors, it was assigned a low sensitivity due to the nature of the activities undertaken, with a moderate adverse magnitude of impact arising from the potential temporary loss of land, traffic-related delays affecting access and potential changes to the operating environment. This results in an overall minor adverse effect, which is not significant. That assessment notwithstanding, and taking into account subsequent relevant representations, the Applicant acknowledges that Ash House Farm Livery Yard is an established equestrian business, recognises that the temporary occupation of land within the construction working width, and that the associated loss of or disruption to that land during construction, could have implications for the operation and viability of the business during construction and for a period thereafter whilst land is reinstated. The Applicant further recognises that, due to the nature of the business and the need to provide continuous care for horses kept on site, accommodating horses during construction may present particular challenges. The Applicant will seek to engage further to better understand the effect of the temporary construction on the overall business, and to explore how best 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 detailed design once the Applicant can confirm the final working areas required The Applicant will continue to engage with the landowners and occupiers on the difficulties they may encounter during construction activities. If mitigation is not reasonably practicable, then 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 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

Reference	RR references	Summary of issue raised	The Applicant's response
			document 1 of 3). For grassland, the restored land would be resown following reinstatement.
RR-LUA-16	RR-086	Concern regarding the impact on Service Family Accommodation (SFA) housing in the Portsmouth region.	The Applicant acknowledges the concern regarding potential effects on Service Family Accommodation (SFA) within the Portsmouth area. The Applicant is aware of residential properties located on Ministry of Defence land, and these receptors are included within the ES Chapter 12 Land use and agriculture [APP-091] baseline, including properties on Farlington Avenue and Birkdale Avenue. ES Chapter 12 Land use and agriculture [APP-091] assesses the potential effects of the Project on residential properties in this area, including those on Farlington Avenue and Birkdale Avenue. Residential areas could experience effects as a result of the temporary, short-term lane closure on the B2177 Portsdown Hill Road to facilitate the construction of a temporary access for construction compound E-1. The duration of proposed closures would vary depending on the construction activity to be undertaken in each location. In most cases the closures involve short-term overnight closures. The assessment concludes that the sensitivity of residential receptors is medium, reflecting the nature of the effects on occupants and the fact that access would be maintained at all times. Given the short-term nature of any road closures and the measures proposed to minimise disruption, the magnitude of impact is considered minor. As a result, the effect is assessed as minor adverse and not significant. The Applicant will continue to engage with the Ministry of Defence throughout the development of the Project and construction planning process. Please refer to RR-297 by TLT LLP on behalf of Secretary of State for Defence (SoD) for further detail on engagement with the SoD and other points raised.

Table 2-16 Summary of issues raised on the theme of landowner engagement and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-LEN-01	RR-237	Observation that a section 56 notice was displayed on the landowner's boundary referring to a specific parcel reference.	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. This comment references the site notices that were used where there was unregistered land within the Order Limits. Site notices were affixed on, or adjacent to the unregistered land, in order to notify any unregistered interested parties of the Project proposals. The Applicant also placed site notices within 5km of each other along the route with the intention of being positioned within areas with the highest footfall.
RR-LEN-02	RR-023, RR-333, RR-358	Statements of professional status or agency provided as context, including acting for affected landowners and equine professional expertise.	No substantive issue requiring a response from the Applicant is raised.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-LEN-03	RR-358	Concern that the affected land supports a horse breeding and management business, into which the tenant has made significant capital investment, and that pipeline installation will cause enormous disturbance and loss of rent.	The Applicant acknowledges that during the construction of the Project, landowners and occupiers 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. 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 landowners and occupiers 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. The Applicant wishes to add that none of the restrictions set out in Schedule 5 to the draft Development Consent Order [APP-023] will prohibit landowners 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 (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.
RR-LEN-04	RR-034, RR-100, RR-132, RR-226, RR-282, RR-285, RR-299	Concerns about the difficulty of finding suitable, safe and available alternative grazing and livery accommodation locally, given the ongoing closure of DIY yards.	The Applicant acknowledges that during the construction of the Project, landowners and occupiers 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. 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.
RR-LEN-05	RR-034, RR-132, RR-299	Concerns about the financial impact on horse owners of relocation, including the higher cost of full livery, transport, hay and reduced availability of local supplies.	The Applicant acknowledges that during the construction of the Project, landowners and occupiers 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.

Reference	RR references	Summary of issue raised	The Applicant's response
			The Applicant will continue to engage with the landowners and occupiers on the difficulties they may encounter during construction activities. 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-LEN-06	RR-132, RR-282, RR-299, RR-358	Concerns about the financial impact on affected livery yard owners and landowners, including loss of rental income and yard viability.	Please see the Applicant's response to RR-LEN-05. The Applicant confirms that affected landowners and occupiers will be entitled to claim compensation, in accordance with the Compensation Code, for reasonable losses incurred as a result of the temporary use of land for construction of the Project and any consequent impacts on business operations.
RR-LEN-07	RR-233	Comments that the terms currently offered do not represent a viable basis for voluntary acceptance by affected parties.	The Applicant refutes the statement that the terms currently offered do not represent a viable basis for voluntary acceptance. 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

Reference	RR references	Summary of issue raised	The Applicant's response
			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 refers to RR-233 which acknowledges that the Applicant has negotiated terms. 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. The Applicant remains willing to discuss voluntary agreements and has repeatedly offered site meetings to address the respondent's landowner-specific concerns.
RR-LEN-08	RR-237	Question raised about what the blue-coloured planning development area shown on notices will involve and what else may affect their property.	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. This comment references the site notices that were used where there was unregistered land within the Order Limits. Site notices were affixed on, or adjacent to the unregistered land, in order to notify any unregistered interested parties of the Project. The Applicant confirms that details of the extent of the Order Limits and proposed works can be found in the Works Plans [AS-007, AS-008 and APP-014] and Land Plans (Document reference 2.2, DCO Volume 2, Version 2).

Table 2-17 Summary of issues raised on the theme of landscape and visual and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-LVIA-01	RR-018, RR-129, RR-192, RR-247, RR-294, RR-354	Concerns about the significant visual impact of the Water Recycling Plant, including its scale (maximum building height of 14.5m and main process building of up to 170m by 115m) and its permanent urbanising effect on the currently rural coastal setting of Langstone Harbour.	Environmental Statement (ES) Chapter 13 Landscape and visual [APP-092] concludes that visual effects at the representative viewpoints around Langstone Harbour would not be significant during operation. This reflects the embedded mitigation measures incorporated into the design of the Water Recycling Plant (WRP) building and structures and the landscape mitigation, with the benefits of proposed planting increasing over time as vegetation establishes and matures. The WRP is located within Local Landscape Character Area (LLCA) 13: Farlington Marshes and Coastal Parks, as identified in ES Chapter 13 Landscape and visual [APP-092] and shown in ES Figure 13.17 Local Landscape Character Areas [APP-322]. LLCA13 comprises the northern shoreline of the harbour, including Farlington Marshes and Broadmarsh Coastal Park. It lies between Langstone Harbour to the south and the extensive urban industrial and residential development which stretches across the coastal plain between Havant to the east and Portsmouth to the west. In addition to the WRP, LLCA13 also includes parts of the proposed underground pipelines connecting the WRP to Budds Farm Wastewater Treatment Works (WTW) and Otterbourne Water Supply Works (WSW), and the proposed pumping station at Budds Farm WTW. It cannot be described as rural because of its urban context, but does contribute to the coastal setting of Langstone Harbour. LLCA11 lies to the south and comprises the tidal basin, including the intertidal landscape, open water and islands that together form Langstone Harbour. Langstone Harbour is a distinctive coastal landscape characterised by extensive intertidal areas, open water, mudflats and saltmarsh habitats, with a strong sense of openness created by expansive skies and long-distance views. The harbour is valued for its natural character, ecological importance and recreational function, with much of the shoreline accessible to the public via the Solent Way promoted route, which forms part of the King Charles III England Coast Path National Trail. The assessment of visual effects has been undertaken in accordance with the landscape and visual impact assessment (LVIA) methodology set out in ES Appendix 13.2 LVIA methodology [APP-172] and summarised within ES Chapter 13 Landscape and visual [APP-092]. The LVIA has considered the effects during construction, year 1 of operation and year 15 of operation, taking account of mitigation measures embedded within the Project design. The assessment was informed by winter and summer fieldwork, representative viewpoint photography and visualisations prepared in accordance with Landscape Institute Technical Guidance Note (TGN) 06/19. The visual assessment considered the sensitivity of visual receptors and the magnitude of impacts arising from the Project, taking account of embedded mitigation and landscape integration measures. Views of the WRP would vary around Langstone Harbour during operation. The most open views would be from the higher, open ground within

Reference	RR references	Summary of issue raised	The Applicant's response
			Broadmarsh Coastal Park (VP016) where the top of the proposed WRP and process tanks would be visible beyond existing vegetation and lighting columns lining Harts Farm Way. This is illustrated by the photomontage in ES Figure 13.23 Viewpoint photography - 3 of 45 documents [APP-330]. Views from the King Charles III England Coast path that runs along the edge of the harbour to the south are substantially more screened by the intervening topography. From Hayling Island (VP004), upper parts of the main WRP process building and associated structures may be glimpsed in the distant background but would be largely screened by retained intervening landform within Broadmarsh Coastal Park and boundary vegetation around the WRP site. Any visible elements would be experienced in the context of the extensive industrial development within the adjacent Brockhampton Industrial Estate, which is of a similar scale. It should also be considered in the context that it is allocated for development within the Local Plan and that planning consent had previously been consented by HBC for a substantial employment scheme on the site. A photomontage from VP004 demonstrating this is included in ES Figure 13.23 Viewpoint photography - 1 of 45 documents [APP-328]. Closer to the Order Limits (VP011), existing vegetation would restrict views towards the WRP. Baseline photography from this location is provided in ES Figure 13.23 Viewpoint photography - 2 of 45 documents [APP-329]. Further west, from Farlington Marshes (VP017 and VP133), upper sections of the main WRP process building and associated structures may be perceptible in winter of year 1 of operation due to the more open character of the western side of Broadmarsh Coastal Park, although the WRP would remain partially filtered by vegetation and viewed in the context of the existing Brockhampton Industrial Estate. Baseline photography from these locations is shown in ES Figure 13.23 Viewpoint photography - 3 of 45 documents [APP-330] and ES Figure 13.23 Viewpoint photography - 44 of 45 documents [APP-371] respectively. From the publicly accessible spaces along Eastern Road (VP129 and VP132), limited views of upper building elements and associated structures may be distinguishable in the background but would similarly be experienced within the wider urban and industrial setting of the northern harbour edge. These viewpoints are illustrated in ES Figure 13.23 Viewpoint photography - 43 of 45 documents [APP-370] and ES Figure 13.23 Viewpoint photography - 44 of 45 documents [APP-371] respectively. By year 15 of operation in summer, proposed boundary planting around the WRP would be established and would contribute to the integration of the WRP within the surrounding landscape. Views of the WRP would be increasingly filtered and screened by both proposed and reinforced existing vegetation. Whilst occasional glimpses of the upper parts of buildings and structures may remain through or above vegetation, these would be limited in extent and experienced in the context of the adjacent Brockhampton Industrial Estate. Consequently, there would be little change to the overall character and

Reference	RR references	Summary of issue raised	The Applicant's response
			composition of views experienced from Langstone Harbour and the visual amenity of people using the harbour and the surrounding recreational routes. The assessment of landscape and visual effects informed the evolution of the Project throughout the design process. This iterative approach has influenced the layout, scale, appearance and mitigation strategy for the WRP and associated infrastructure. The resulting mitigation measures have been embedded within the design that forms the basis of the LVIA. The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1), establishes General Design Principles and Site-Specific Design Principles with which the detailed design of the Project must comply. These principles provide a mechanism to secure the design assumptions and mitigation measures relied upon within the LVIA. Relevant design principles include requirements relating to: • Limiting building heights (WRP_9 to WRP_12, BPT/IPS-E_7, IPS-F_6, IPS-G_4, BPT-K_6 and BFWTW_2). • Positive integration of buildings into their landscape setting (GDP_1, GDP_9, WRP_13, BPT/IPS-E_2, IPS-F_8, IPS-G_6 and OWSW_1) • The use of materials and colour palettes appropriate to local context (GDP_1, WRP_14, BPT/IPS-E_8, IPS-F_7, IPS-G_5, BPT-K_7 and OWSW_5). • Retention of existing vegetation and landscape features, where reasonably practicable (GDP_11, GDP_13 and GDP_10). • Reinforcement of boundary planting and landscape screening (WRP_15, WRP_16, BPT/IPS-E_11, BPT/IPS-E_12, BPT/IPS-E_14, IPS-F_8, IPS-F_9, IPS-F_10, IPS-G_6, IPS-G_7, IPS-G_8 and BPT-K_8). • Consideration of visual impact in views from Broadmarsh Coastal Park, Langstone Harbour, Farlington Marshes and the coastal path (WRP_13), resulting in design measures that reduce the prominence of the WRP and improve its integration within the surrounding landscape. • Provision of a green/brown roof on the main WRP process building (WRP_17). Together, these measures minimise visual effects, improve landscape integration and reduce the prominence of new built form within views from Langstone Harbour and surrounding recreational routes. Through the Design Principles these measures will be carried forward into detailed design, ensuring the visual effects are not environmentally worse than those assessed and reported in the ES, noting that no significant residual visual effects have been identified.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-LVIA-02	RR-018, RR-129, RR-192, RR-294, RR-354	Concerns that screening planting relied upon in the landscape and visual assessment cannot be depended upon to establish and persist on the reclaimed landfill site, given the difficult ground conditions, contamination, landfill gas, and exposed coastal environment.	The WRP site is allocated employment use in the Havant Local Plan and there is an extant planning consent for employment use (APP/21/00189), which includes buildings up to 18.5m above finished floor level and similar boundary treatments to those proposed for the Project. The Applicant proposes tree and shrub planting around the WRP site boundaries where mature vegetation is already successfully established, indicating that planting is viable in these peripheral areas. This existing vegetation within the WRP site will be retained, as far as practicable, and protected in accordance with the Outline Construction Environmental Management Plan (CEMP) (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and ES Appendix 13.5 Arboricultural Impact Assessment [APP-175 and APP-176 – 2 documents] which includes the Tree Impact Plan. Detailed planting specification will be developed at the detailed design stage post-consent. This will be informed by site specific ground conditions determined at that time. The Outline Landscape and Ecology Management Plan (LEMP) (Document reference 7.5, DCO Volume 7, Version 1) requires the final species mixes and planting specifications to respond to local site conditions and includes provisions for establishment maintenance, long-term management, monitoring and remedial action where planting does not establish. It should also be noted that visual screening of the WRP does not rely solely on proposed planting. Existing vegetation around Broadmarsh Coastal Park, which currently provides substantial screening from Langstone Harbour, would be retained and would not be affected by the Project. Both retained vegetation and proposed mitigation planting, including its establishment over time, have been taken into account in the assessment of landscape and visual effects presented in ES Chapter 13 Landscape and visual [APP-092].
RR-LVIA-03	RR-018, RR-040, RR-129, RR-192, RR-225, RR-294, RR-354	Concerns about the impact of night-time lighting at the Water Recycling Plant and pumping stations on dark skies, coastal views, and nearby nature reserves such as Langstone Harbour.	Paragraph 3.3.11 of ES Chapter 3 Description of the Proposed Development [APP-082] explains that external lighting of the WRP site would be limited to that required to illuminate access roads, paths and walkways, and areas where operational and maintenance tasks are required and may also be required in the event of an emergency. With reference to ES Figure 13.10 Night-time baseline [APP-315], the WRP site lies within a landscape which is already brightly lit at night, is not within a dark sky designation and due to this cannot be described as having a dark sky character. ES Chapter 13 Landscape and visual [APP-092] explains that lighting of the WRP during construction and operation at night would be seen in the context of the brightly lit Bedhampton Industrial Area to the east, lighting along Harts Farm Way to the south and the A27 to the north in views in and around Langstone Harbour. The lighting design will be progressed as part of the detailed design of the WRP site post-consent in accordance with Design Principle GDP_6 Minimising Light Impacts, which will be subject to further approvals in line with the requirements of the draft DCO [APP-023]. The lighting design would be designed in line with relevant standards, regulations and guidance and in

Reference	RR references	Summary of issue raised	The Applicant's response
			accordance with the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1).
RR-LVIA-04	RR-018, RR-129, RR-192, RR-294, RR-354	Concerns that the landscape and visual assessment has not adequately represented views from key viewpoints, including the shores of Langstone Harbour, Farlington Marshes, Hayling Island (Old Oyster Beds off the Hayling Billy footpath and cycle route), and Portsdown Hill, and that additional viewpoints and night-time assessments are required.	The viewpoints set out in Environmental Statement ES Chapter 13 Landscape and visual [APP-092] are appropriate and proportionate, covering the key the locations from which the Project may be experienced. The selection was informed by Zone of Theoretical Visibility analysis, presented in ES Figures 13.18 to 13.21 [APP-323 to APP-326], desk study and winter and summer fieldwork. Representative viewpoints were then selected to cover a range of receptor types, distances and viewing conditions. The locations of viewpoints, including those to be produced as Landscape Institute (LI) Type 4 photomontages and night-time photography, were discussed and agreed with the relevant local planning authorities through the EIA Working Groups and bilateral engagement, as described in section 13.3 of ES Chapter 13 Landscape and visual [APP-092]. Views from Langstone Harbour and its shores are represented by viewpoints around the harbour edge, including: • VP004 on the Hayling Billy Coastal Path / King Charles III England Coast Path National Trail. • VP011 on the northern edge of the harbour, near Budds Farm Wastewater Treatment Works, on the Solent Way / King Charles III England Coast Path National Trail. • VP017 and VP133 at Farlington Marshes, on the Solent Way / King Charles III England Coast Path National Trail. • VP129 and VP132 on the Solent Way / King Charles III England Coast Path National Trail, near Eastern Road. These viewpoints represent views from the eastern, northern, north-western and western sides of Langstone Harbour. The visual assessment is presented in ES Chapter 13 Landscape and visual [APP-092], with detailed baseline descriptions and assessments for each viewpoint provided in ES Appendix 13.4 Visual baseline and effects [APP-174]. The viewpoint locations are shown in ES Figure 13.22 Representative viewpoint [APP-327], and the supporting winter and summer photography and visualisations are provided in ES Figure 13.23 Viewpoint photography [APP-328 to APP-372 – 45 documents]. The visualisations were prepared in accordance with LI TGN 06/19 *Visual representation of development proposals*. As mentioned within RR-LVIA-01, the assessment identifies that visibility of the WRP would vary around the harbour but would largely form a minor element in views which are strongly characterised by extensive urban residential and industrial development. From Hayling Island at VP004, upper parts of the proposed structures may be glimpsed in the distant background but would be largely screened by intervening landform and vegetation. From Farlington Marshes at VP017 and VP133, and from Eastern Road at VP129 and VP132,

Reference	RR references	Summary of issue raised	The Applicant's response
			limited views of the upper parts of the structures may be possible, but these would be filtered by vegetation and experienced in the context of the existing Brockhampton Industrial Estate and the wider developed northern harbour edge. Views of users of Broadmarsh Coastal Park are represented by VP016, from which a Landscape Institute LI Type 4 photomontage has been prepared. The assessment identifies this as the most open view towards the WRP, although it is located on higher ground within the coastal park rather than representing a view from Langstone Harbour itself. At year 1 of operation, the upper parts of the structures would be visible beyond retained vegetation; by year 15 of operation, established planting would assist with screening and landscape integration, reducing effects to not significant. Views towards the WRP from the elevated eastern end of Portsdown Hill are represented by VP108 and are also reflected more broadly of views from the elevated slopes and public viewpoints across the wider Portsdown Hill ridge. Visibility of the WRP from Portsdown Hill would be limited by topography, woodland and mature vegetation, and the proposed structures would not be visible from most of the open slopes and publicly accessible viewpoints. Where visible, the upper parts of the structures would be experienced as a very minor element within extensive panoramic views that are already characterised by urban residential, commercial, industrial and transport infrastructure development around the northern edge of Langstone Harbour and the wider Portsmouth area. From VP108, located on Portsdown Hill Road, approximately 1km north-west of the WRP site, the new structures would be glimpsed in the background above mature vegetation within the A3(M)/A27 interchange and experienced in the context of Brockhampton Industrial Estate. At year 15 of operation, established mitigation planting would further assist in integrating the new structures into the landscape. Views from and within Portsdown Hill in relation to BPT/IPS-E have also been considered, these include: • VP018, VP019 and VP020 along the Wayfarer's Walk, representing views towards BPT/IPS-E from the east and on approach from the north. • VP021 at the Portsdown Hill viewpoint and associated public open space. • VP022 and VP023 along Footpath 218/28/1 near New Down Lane, to the west and north-west of BPT/IPS-E. • VP024 near Fort Widley. Together, these viewpoints provide representative cover of views towards BPT/IPS-E from promoted recreational routes, public rights of way, publicly accessible open spaces and key viewing locations along Portsdown Hill. The assessment identifies that visibility of BPT/IPS-E varies across Portsdown Hill depending on distance, topography and the extent of intervening vegetation. From the Wayfarer's Walk at VP018, VP019 and VP020, the upper

Reference	RR references	Summary of issue raised	The Applicant's response
			parts of the proposed buildings, structures and perimeter fencing may be visible across the northern slopes of Portsdown Hill and would be experienced in the context of existing telecommunications infrastructure, farmland and the urban edge of Widley. From Footpath 218/28/1 and New Down Lane at VP022 and VP023, more open and direct views towards BPT/IPS-E are available due to the proximity of these viewpoints to the proposed infrastructure. In contrast, views from the promoted Portsdown Hill Viewpoint and associated public open space at VP021 are largely screened by vegetation along Portsdown Hill Road, while from VP024 near Fort Widley, visibility is more limited and experienced within wider panoramic views across the northern slopes of Portsdown Hill and the surrounding rural landscape. Viewpoints further west comprise VP036, VP037, VP038, VP041, VP042 and VP043. These viewpoints mainly represent views towards the Pipeline and associated construction activities and provide additional coverage of receptors using public rights of way and promoted recreational routes within the wider Portsdown Hill and Forest of Bere landscape. Night-time conditions have been included within the baseline and assessment presented in ES Appendix 13.4 Visual baseline and effects [APP-174]. Viewpoints that include night-time photography were also agreed with the relevant local planning authorities through the EIA Working Groups and bilateral engagement, with a focus on viewpoints associated with the Above Ground Plants. This includes VP019 in relation to BPT/IPS-E. The assessment considers potential lighting effects during construction and operation, including views from Langstone Harbour, Farlington Marshes, Hayling Island and Portsdown Hill, where relevant. The Applicant therefore considers that ES Chapter 13 Landscape and visual [APP-092] appropriately represents views from Langstone Harbour, Farlington Marshes, Hayling Island, and Portsdown Hill. The selected viewpoints provide a robust basis for assessing the likely effects on the identified receptor groups, and additional viewpoints or visualisations are not necessary.
RR-LVIA-05	RR-018, RR-192, RR-294	Requests that maximum building heights and operational lighting limits are secured through requirement in the DCO Order rather than through the Design Principles Document or Design Approach Document alone.	The Design Principles contained in the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) (including those on maximum building heights and avoiding and/or reducing operational lighting impacts) are secured by a requirement within Schedule 2 to the draft DCO [APP-023].
RR-LVIA-06	RR-129, RR-281, RR-354	Concerns about the visual impact of the above-ground pipework (up to 3m high) proposed at Mill Dam within the Old Bedhampton Conservation Area, including views from Mill Lane, the historic railway bridge, and the public footpath.	Potential views of the above-ground pipework have been assessed in ES Chapter 13 Landscape and visual [APP-092], insofar that they affect people's views and visual amenity, with a detailed assessment presented in ES Appendix 13.4 Visual baseline and effects [APP-174]. The LVIA concludes that operational visual effects would not be significant. This reflects the limited visibility of the above-ground pipework within the wider landscape context, the presence of existing vegetation and landscape features that would continue to

Reference	RR references	Summary of issue raised	The Applicant's response
			filter views, and the implementation of embedded design and mitigation measures. Impacts and effects on the historic environment are addressed in ES Chapter 7 Archaeology and cultural heritage [APP-086]. This operational assessment concludes the above-ground pipeline would result in a neutral adverse effect, which would not be significant in the context of the EIA Regulations and would represent harm at the lowest end of the scale in the context of the National Policy Statement for Water Resources Infrastructure. The LVIA takes account of existing vegetation, intervening landform and the surrounding urban edge context. The relevant viewpoint for Mill Dam and Old Bedhampton Conservation Area is VP009 representing views of people travelling along the Wayfarer's Walk promoted route. This identifies that existing vegetation associated with the Hermitage Stream and surrounding landscape features would continue to filter views towards the Project and that effects would not be significant in construction or operation. The above-ground section of pipeline would be limited to the area around Old Mill Dam and is controlled through the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). Design Principle PL_9 requires the detailed design to optimise existing visual screening from hedgerows, woodland and structures, particularly in views across the millpond and from the Grade II listed Old Mill, where reasonably practicable. In addition, the materials and finishes of the pipework and associated structures must seek to respect and reinforce local character through the use of materials and colour palettes appropriate to the local context. Furthermore, where vegetation removal cannot be avoided during construction, Design Principle GDP_13 requires reinstatement and replacement planting to be undertaken as close as practicable to the existing vegetation, helping to restore landscape structure and visual screening following construction.
RR-LVIA-07	RR-226, RR-282, RR-354	Concerns about the loss of trees and woodland along the pipeline route, including the loss of natural shelter for horses and wildlife and the loss of streets trees.	The Applicant is committed to retention of existing tree features including respecting root protection areas (RPAs) where reasonably practicable, with trees and woodlands taken into consideration throughout the design process. There will be no loss or deterioration of ancient woodlands or ancient and veteran trees. Where vegetation removal is unavoidable, the first principle of the detailed design process will be to avoid high-quality category A trees as a first priority, followed by moderate-quality category B and low-quality category C trees, wherever practicable. This hierarchy and prioritisation of avoidance to minimise tree loss followed by further mitigation measures including replacement planting are set out in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and the Outline LEMP [APP-420]. The assessment undertaken and reported within the ES Appendix 13.5 Arboricultural Impact Assessment [APP-175 to APP-176 - 2 documents] is based on worst case scenario assumptions, therefore the tree loss would be minimised at detailed design stage.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-LVIA-08	RR-354	Concern that any tunnel constructed below Great Copse Ancient Woodland must be deep enough to ensure no impact on the veteran and deep-rooted trees above.	The Applicant is not proposing any works in this location, however the Order Limits include the route of pipelines separately consented by Portsmouth Water pipelines. These works will be undertaken by Portsmouth Water and not as part of this Project.
RR-LVIA-09	RR-129, RR-354	Requests that the DCO includes a condition requiring any tree or scrub planting for screening to be provided in clean soil at least 1.5m deep, to protect roots from the underlying landfill contamination and gas.	Detailed planting specifications will be developed at the detailed design stage, post-consent. This will be informed by site-specific conditions, including soil characteristics and the requirements of the selected species. Further detail on soil management is provided in 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). The Outline Landscape and Ecolgoy Management Plan (LEMP) (Document reference 7.5, DCO Volume 7, Version 1) requires the planting design to respond to local site conditions and includes measures for establishment maintenance, monitoring and remedial action where planting does not establish as anticipated. The Applicant therefore considers that the detailed design process provides an appropriate mechanism to determine any soil preparation, remediation or planting requirements necessary to secure the successful establishment of landscape mitigation.
RR-LVIA-10	RR-129, RR-354	Requests that the DCO includes a condition extending the landscape maintenance and aftercare period for tree screening to at least 30 years, given the difficult growing conditions on the site.	The Outline Landscape and Ecolgoy Management Plan (LEMP) (Document reference 7.5, DCO Volume 7, Version 1) includes measures for the monitoring, management and replacement of landscape planting to support successful establishment. Management and monitoring responsibilities are set out within section 3.5. Paragraph 3.5.2 of the Outline LEMP explains that initial establishment and maintenance measures will be carried out during the first five years following planting of all new habitats and landscape features. Paragraph 3.5.3 goes on to clarify the timescales for long-term management, explaining that planting within Environmental Mitigation and Enhancement Areas (EMEA) associated with Above Ground Plant including the WRP will be managed for the lifetime of the Project. In addition, planting associated with Above Ground Plants would be managed for the lifetime of the Project. Other planting will be managed until established, for periods of up to 15 years, with the specific management requirements to be defined through the detailed LEMPs to be submitted for approval to the relevant local planning authorities for the locality. The Applicant considers that appropriate measures are already secured to support the successful establishment, management and long-term function of the proposed landscape mitigation.
RR-LVIA-11	RR-129, RR-354	Requests that the DCO includes a condition limiting night-time lighting at the Water Recycling Plant to task-based lighting controlled by sensors or timers, to protect night-time ecology and reduce visual impact.	Paragraph 3.3.11 of Environmental Statement (ES) Chapter 3 Description of the Proposed Development [APP-082] explains that external lighting at the WRP site would be limited to that required for access roads, paths and walkways, operational and maintenance activities, and in the event of emergency. The LVIA presented in ES Chapter 13 Landscape and visual

Reference	RR references	Summary of issue raised	The Applicant's response
			[APP-092] considers the effects of construction and operational lighting and concludes that these would be experienced in the context of existing lighting within the surrounding area. The detailed lighting design for the WRP site will be developed post-consent during the detailed design stage and will be subject to the relevant approvals secured through the DCO. The lighting design will accord with relevant standards, regulations and guidance, and will be developed in accordance with the Design Principles GDP_6 set out in the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1).
RR-LVIA-12	RR-354	Concerns about the methodology and assumptions underpinning the Applicant's landscape and visual impact assessment, including the Year 15 impact assessment being carried out in summer rather than winter, reliance on leaf cover for screening, discrepancies between Medium/Medium sensitivity and impact scores being classified as 'minor adverse (not significant)', and the omission of a Year 15 forward projection at certain viewpoints.	The assessment methodology, set out in ES Appendix 13.2 LVIA methodology [APP-172] is consistent with the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3) and subsequent Notes and Clarifications published by the Landscape Institute in August 2024 (TGN 01/24). This document provides a full explanation of the process and criteria that have guided the assessment of landscape and visual effects, including the application of professional judgement in determining the sensitivity, magnitude of impact and significance of effects. A winter scenario has been assessed for construction and year 1 of operation. This represents the worst case when deciduous vegetation is not in leaf, views are at their most open and proposed planting has not established. The residual effects of operation have been assessed at year 15 in summer to demonstrate the effectiveness of planting once established, in line with established best practice. By year 15 of operation the proposed planting is expected to have grown by at least 4.5m in height. The growth of plants over this period means that there would generally be more open views in the early years of operation but that effects would gradually reduce over time. The assessment does not assume complete or uniform screening at year 15 of operation, and any remaining visibility through or above vegetation is acknowledged in the receptor-specific assessment. The reference in paragraph 1.3.10 of ES Appendix 13.2 LVIA methodology [APP-172] to planting being "*fully established*" at year 15 of operation does not mean that trees would have reached full maturity or their maximum ultimate height. Rather, this scenario represents a point at which the proposed planting is assumed to have established sufficiently to perform its intended landscape integration and screening functions. All effects at year 15 of operation are residual. Paragraph 13.7.157 of ES Chapter 13 Landscape and visual [APP-092] states that locations for the representative viewpoints, annotated photographs and verifiable photomontages were agreed with Hampshire County Council and relevant planning authorities, and presented in ES Figure 13.23 [APP-328 to APP-372 – 45 documents]. Proposed planting is intended not only to screen above ground infrastructure in sensitive views, but also to integrate the Project into the surrounding landscape by reinforcing existing vegetation patterns and provide an appropriate landscape setting. It is one component of a wider suite of

Reference	RR references	Summary of issue raised	The Applicant's response
			embedded mitigation measures secured through the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1), including limits on building and structure heights, landscape integration requirements, materials and a colour palette appropriate to the local context and reinforcement of existing boundary vegetation. Measures to secure the successful implementation, establishment and long-term management of proposed planting are set out in the Outline LEMP (Document reference 7.5, DCO Volume 7, Version 1). The Applicant therefore considers that the combination of a Year 1 winter assessment and a Year 15 summer assessment provides a proportionate basis for assessing the reasonable worst-case operational effects and the effectiveness of the proposed landscape mitigation over time.
RR-LVIA-13	RR-354	Reference to relevant national policy for the assessment, including NPS-WRI sections 4.9.10 (landscape character, quality, value and capacity), 4.9.15 (locally valued landscapes) and 4.9.17 (coastal areas being particularly vulnerable to visual intrusion).	The relevant national policy is addressed in ES Appendix 13.1 Landscape and visual legislation and planning policy [APP-171]. This includes NPSWRI paragraph 4.9.10 in relation to landscape character, quality, value and capacity to accommodate change; paragraphs 4.9.15 and 4.9.16 in relation to locally valued landscapes and local landscape designations; and paragraph 4.9.17 in relation to visual effects on sensitive receptors and the particular vulnerability of coastal areas to visual intrusion. These policy considerations informed the LVIA and the iterative design of the Project from the outset, as reported in ES Chapter 13 Landscape and visual [APP-092]. The LVIA has included a detailed and thorough assessment of the value attached to the landscape and to views of the landscape, applying the process and criteria set out in ES Appendix 13.2 LVIA methodology [APP-172]. An assessment of these policies is provided at section 4.4 of the Planning Policy Statement (Document reference 5.5, DCO Volume 5, Version 2).
RR-LVIA-14	RR-354	Clarification that the objection is confined to the permanent urbanising visual effects of the Water Recycling Plant, its storage vessels and night-time lighting, and the above ground pipework at Old Mill Dam, rather than localised construction-phase visual effects.	The Applicant understands these matters mainly relate principally to the landscape and visual assessment of operational effects associated with the WRP, including the proposed buildings, storage vessels, lighting and associated mitigation planting, rather than temporary construction effects. The Applicant's response to these matters is provided in response to principally RR-LVIA-01 and RR-LVIA-06.
RR-LVIA-15	RR-128, RR-354	Concerns that difficult and contaminated ground conditions at the WRP site will prevent landscape screening trees from establishing to a height that provides effective screening.	Please see the Applicant's response to RR-LVIA-02.

Table 2-18 Summary of issues raised on the theme of legislation, policy and permits and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-LPP-01	RR-018	Concern that NPS WRI paragraphs 3.5.1 and 3.5.3 impose freestanding legal and policy requirements for the proper consideration of alternatives which should have applied from the earliest stages of scheme evolution.	The Applicant is confident that all legal and policy requirements in relation to the assessment of alternatives through the Development Consent Order (DCO) process have been fully met as set out in the Planning Policy Statement [AS-014] from paragraphs 4.3.30 - 4.3.40. Please also refer to the WRMP24 Position Statement [PDA-004].
RR-LPP-02	RR-018, RR-192, RR-354, AS-033	Concerns over gaps in the UK regulatory framework for contaminants of emerging concern, including PFAS and pharmaceuticals, for which no Environmental Quality Standards or discharge permit limits exist.	The output from the Water Recycling Plant (WRP) will be subject to an environmental permit which will set out the quality that the water must meet in order for it to be discharged into the Havant Thicket Reservoir. Paragraph 3.8.3 of the National Policy Statement for Water Resources Infrastructure confirms that the Secretary of State "should work on the assumption that, in terms of the control and enforcement, the relevant pollution control or other consenting regime will be properly applied and enforced. Decisions under the Planning Act should complement *but not duplicate* those taken under the relevant pollution control regime" [emphasis added]. Whilst the concerns raised are noted, they are beyond the scope of the DCO Examination process. The Applicant will comply with the conditions of the environmental permit, ensuring that the recycled water does not cause harm to the environment. For further information about how the environmental permitting process will operate in relation to the Project, please refer Appendix D and 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).
RR-LPP-03	RR-018, RR-354	Suggestions that a bespoke monitoring, audit and enforcement regime should be secured through the DCO to address regulatory gaps rather than relying on the existing discharge permitting regime.	Paragraph 3.8.3 of the National Policy Statement for Water Resources Infrastructure confirms that the Secretary of State 'should work on the assumption that, in terms of the control and enforcement, the relevant pollution control or other consenting regime will be properly applied and enforced. Decisions under the Planning Act should complement *but not duplicate* those taken under the relevant pollution control regime' (emphasis added). Accordingly, it would not be appropriate for Schedule 2 to the draft DCO [APP-023] to include any Requirement relating to the quality of the water to be discharged into the reservoir. The Applicant will continue to work closely with the Environment Agency as the regulator. In its Relevant Representation (RR-102-12) the Environment Agency confirms that whilst it cannot pre-determine the outcome of any permit application, they have not identified any issue that would indicate that these permits cannot be granted. For further information about how the environmental permitting process will operate in relation to the Project, please refer to Appendix D and 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).

Reference	RR references	Summary of issue raised	The Applicant's response
RR-LPP-04	RR-084	Concerns that the Project would place the Applicant and its directors in breach of statutory duties to provide safe drinking water and protect customers, potentially constituting a criminal offence.	The Applicant notes this comment though there is no basis for this assertion. Drinking water supplies are subject to regulation by the Drinking Water Inspectorate (DWI) to ensure compliance with legal standards for drinking water quality and safety. The recycled water produced by the water recycling plant will be blended with spring water and stored in Havant Thicket Reservoir. This water will then be subject to further treatment at Otterbourne Water Supply Works (WSW) before it is made available to customers. As confirmed by the DWI in its letter [PDA-038], it is the regulator responsible for ensuring there is no deterioration in the quality of drinking water. In addition, the output of the water recycling plant will be subject to and will comply with an environmental permit to be issued by the Environment Agency. For further information about the relationship between the DCO and these regulatory regimes, please refer to Appendix D and 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).
RR-LPP-05	RR-266	Suggestion that the Examining Authority should scrutinise whether the existing outfall and discharge permit provide adequate environmental protection for the ongoing discharge of wastewater and reject water to the sea.	The Applicant confirms that the output of the water recycling plant into the Havant Thicket Reservoir and through the Eastney Long Sea Outfall with be subject to an environmental permit. Pre-application engagement with the Environment Agency is ongoing. Paragraph 3.8.3 of the National Policy Statement for Water Resources Infrastructure confirms that the Secretary of State '*should work on the assumption that, in terms of the control and enforcement, the relevant pollution control or other consenting regime will be properly applied and enforced. Decisions under the Planning Act should complement but not duplicate those taken under the relevant pollution control regime'*. Accordingly, the Examination should assume that the environmental permit will effectively control the risk of impacts from this discharge. For further information about the relationship between the DCO and these regulatory regimes, please refer to Appendix D and 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).
RR-LPP-06	RR-354	Suggestions that Defra should introduce bespoke national regulations and guidance for water recycling, including sewer catchment risk assessments and mandatory control measures informed by international good practice.	The Applicant notes this comment, but this goes beyond the remit of the DCO application. As above, paragraph 3.8.3 of the National Policy Statement for Water Resources Infrastructure confirms '*decisions under the Planning Act should complement but not duplicate those taken under the relevant pollution control regime'* (emphasis added). The water quality of the output from the water recycling plant will be controlled by and managed in accordance with the environmental permit, which is regulated and enforced by the Environment Agency.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-LPP-07	RR-354	Suggestions that the Planning Inspectorate and LPA should consider wider water quality impacts not covered by the Environment Agency discharge permitting process as part of the DCO determination, including submission of modelling and assessment for a broader range of contaminants.	The Environment Agency is the regulatory body responsible for the control of any discharge of potentially polluting substances into the environment. The output from the water recycling plant will be controlled by and managed in accordance with the environmental permit. Paragraph 3.8.3 of the National Policy Statement for Water Resources Infrastructure confirms that the Secretary of State 'should work on the assumption that, in terms of the control and enforcement, the relevant pollution control or other consenting regime will be properly applied and enforced. Decisions under the Planning Act should complement *but not duplicate* those taken under the relevant pollution control regime' (emphasis added) As stated in section 19.8 of ES Chapter 19 Water environment [APP-098], the Applicant has undertaken an extensive programme of monitoring of a wide range of Contaminants of Emerging Concern (CECs) in the final treated effluent from Budds Farm Wastewater Treatment Works (WTW) (i.e. a representation of influent water quality to the WRP) and water treated in its pilot treatment plant at Budds Farm WTW. This indicates that releases from the WRP into Havant Thicket Reservoir and downstream water bodies (Riders Lane Stream, Hermitage Stream and Langstone Harbour) are unlikely to contain the full suite of CECs measured by the Applicant or independently recorded in Langstone Harbour and that any CECs remaining in the recycled water will be present in extremely low concentrations. Significant adverse effects on water quality and biota from CECs are considered unlikely, particularly given the full treatment process that will be in place at the WRP. However, it is not the role of the DCO to speculate about how such substances will be regulated in the future. The Applicant will comply with the conditions of the environmental permit, including any updates that may occur over time to reflect changing regulatory standards. For further information about the relationship between the DCO and these regulatory regimes, please refer to Appendix D and 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).
RR-LPP-08	RR-354	Concern over the minimal role of the Drinking Water Inspectorate in regulating effluent recycling plants that discharge into an environmental buffer, including limitations of the risk-based audit approach.	The output of the WRP will be subject to an environmental permit issued by the Environment Agency. The DWI, through the requirements the Water Supply (Water Quality) Regulations places on the Applicant, regulates the water quality of new sources of supply (specifically Regulations 15, 27 and 28) and this is the case in relation to the abstraction from Havant Thicket Reservoir, including once recycled water is utilised. The Drinking Water Inspectorate is concerned with the quality of the water once it has undergone further treatment at Otterbourne WSW. For further information about the relationship between the DCO and these regulatory regimes, please refer to Appendix D within The Applicant's written

Reference	RR references	Summary of issue raised	The Applicant's response
			summaries of oral submissions at OFH1 and ISH1 and post hearing actions (Document reference 8.9, DCO Volume 8, Version 0).
RR-LPP-09	RR-354	Concern that the DWI may not treat recycled effluent as a 'new source' under Regulation 15 of the Water Supply (Water Quality) Regulations where dilution exceeds 50%, potentially exempting the Applicant from associated monitoring requirements.	Please refer to RR-LPP-08. The DWI's role is to ensure the quality of water, after it has undergone further treatment at Otterbourne Supply Works, is maintained. In line with Paragraph 3.8.3 of the National Policy Statement for Water Resources Infrastructure, the Examining Authority should assume that this regulatory regime will effectively control the risks associated with the introduction of a new source of water, in this case the reservoir and recycled water. For further information about the relationship between the DCO and the applicable regulatory regimes, please refer to Appendix D and 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).
RR-LPP-10	RR-354	Suggestions that an Independent Scrutiny Panel of qualified experts should be established to audit the WRP drawing on international good practice for ongoing challenge, audit and verification.	The development of the Project has included input from specialists who have worked on or collaborated with others on well-established international schemes, ensuring that best practice has been embedded throughout the design and development of the Project. The output of the water recycling plant will be subject to an environmental permit, being the applicable regulatory regime to ensure that such discharges do not lead to harm to the environment. Please refer to RR-LPP-03, and further information about the relationship between the DCO and these regulatory regimes can be found in Appendix D and 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).
RR-LPP-11	RR-354	Concern over the inconsistency between permitting new discharges containing PFAS compounds and DWI requirements to reduce consumer risk, with suggestions that effluent recycling should await establishment of safe PFAS standards.	Please refer to RR-LPP-03. It is not the role of the DCO to anticipate future regulatory standards; the Applicant will comply with the conditions of its environmental permit, including any changes over time to reflect regulatory changes. As stated in section 19.8 of ES Chapter 19 Water environment (Document Reference 6.1, DCO Volume 6, Version 1), the Applicant has undertaken an extensive programme of monitoring of a wide range of CECs in the final treated effluent from Budds Farm WTW (i.e. a representation of influent water quality to the WRP and water treated in its pilot treatment plant at Budds Farm WTW. The Applicant's monitoring included a range of potential CECs, with more than 400 substances selected to reflect global best practice for the development of water recycling schemes and risks identified from numerous trade licences in the catchment that contributes wastewater to Budds Farm WTW. The results of the pilot plant investigation are described in an independent review produced by the University of Brighton (Mayor-Smith (2024) [1], as referenced in ES Chapter 19 Water environment (Document Reference 6.1, DCO Volume 6, Version 1)). The results of the investigation into pilot plant performance indicate that the Full Advanced Treatment process resulted in a considerable increase in water quality, with the concentration of CECs decreasing after passing through the

Reference	RR references	Summary of issue raised	The Applicant's response
			pilot plant. Over 60% of the CECs measured in the WRP influent decreased to below the limits of detection in the water that had passed through the WRP, with the largest reductions identified for a range of pharmaceuticals, personal care products and pesticides. The results of the pilot study clearly demonstrate that CEC concentrations in the recycled water are considerably lower than those in the treated effluent from Budds Farm WTW that is currently released under a permitted discharge into the Solent via Eastney Long Sea Outfall (LSO). This suggests any CECs remaining in the WRP output would be present in extremely low concentrations. Significant adverse effects on water quality and biota from CECs are therefore considered unlikely, particularly given that the pilot plant data does not represent the full treatment process that would be in place at the WRP (which would also include a Granular Activated Carbon treatment stage that would also remove contaminants from the recycled water). The overall water quality characteristics of the source water that is transferred and stored at Havant Thicket Reservoir would not be significantly different to the current water quality profile of water treated at Otterbourne WSW prior to going into supply As confirmed in the DWI's Relevant Representation [PDA-038], the Applicant, through the RAPID gated process, has addressed all relevant requirements and actions relating to consumer risk to the DWI's satisfaction and regulatory assurance will continue through the drinking water safety planning and compliance monitoring processes when the scheme is operational. For further information about the relationship between the DCO and these regulatory regimes, please refer to Appendix D and 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).
RR-LPP-12	RR-354	Comments referencing international regulatory and governance frameworks for water recycling schemes, including the Groundwater Replenishment Scheme (Western Australia), the Orange County Water District (California), and NEWater (Singapore), as examples of good practice.	The Applicant notes this comment. 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.
RR-LPP-13	RR-354	A suggestion that the Applicant should demonstrate compliance with the assessment of alternatives requirements of NPS WRI section 3.5 and the EIA Regulations for the environmental buffer, including where each buffer option was assessed and rejected.	All legal and policy requirements in relation to the assessment of alternatives through the DCO process have been fully met as set out in the Planning Policy Statement [AS-014] from paragraphs 4.3.30 - 4.3.40. The Scheme Development Report [APP-073, APP-074, APP-075] sets out the process the Applicant undertook to select the Project. Please also refer to ES Chapter 4 Consideration of Alternatives [APP-083] for further information about how the Project was selected through Water Resource Management Plans, and how alternatives have been considered throughout each stage of the iterative design of the Project. Please also refer to the WRMP24 Position Statement [PDA-004].

Reference	RR references	Summary of issue raised	The Applicant's response
RR-LPP-14	RR-354	A suggestion that the ExA should determine whether the effects of the scheme can be assessed, controlled by available regulatory instruments, and independently verified through the draft DCO, in accordance with section 104 of the Planning Act 2008.	The draft DCO [APP-023] secures the relevant limits, parameters and commitments set out in the Applicant's DCO application. Many of these will be subject to further approvals, as set out in Schedule 2 to the draft DCO [APP-023]. The examination will consider the DCO application in accordance with the National Policy Statement for Water Resources Infrastructure. It is recognised that the Project will also be subject to independent regulatory regimes, in particular the requirement for an environmental permit and the requirements for drinking water quality. For further information about the relationship between the DCO and these regulatory regimes, and how these are to be considered in the Examination, please 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). The purpose of the Examination is to determine whether the development is an acceptable use of the land, and on the impacts of that use, rather than the control of processes, emissions or discharges themselves.
RR-LPP-15	RR-354	Concern that the assumption in NPS WRI section 3.8.3, that the relevant pollution control regime will be properly applied and enforced, does not operate where no Environmental Quality Standard exists for the substances in question.	See response RR-LPP-07. It is not the role of the DCO to speculate about how such substances will be regulated in the future. The Applicant will comply with the conditions of the environmental permit, including any updates that may occur over time to reflect changing regulatory standards.
RR-LPP-16	RR-354	A suggestion that the adequacy of the regulatory framework should be examined as a Principal Issue with an Issue Specific Hearing.	The purpose of the Examination is to determine whether the development is an acceptable use of the land, and on the impacts of that use. The adequacy of other regulatory frameworks is beyond the scope of the Examination and the planning process.
RR-LPP-17	RR-354	Concern about securing mechanisms and secondary consenting arrangements within the draft DCO.	Please refer to RR-LPP-03, in respect of the relationship between the DCO and existing and applicable regulatory regimes. In relation to the securing mechanisms, the draft DCO [APP-023] includes a series of Requirements, broadly equivalent to planning conditions, within Schedule 2. These, and the provisions of the management plans referred to by the Requirements, must be complied with. This approach ensures that the mitigation and other measures, needed to ensure that the impacts of the Project do not exceed the effects reported in the Environmental Statement, are implemented.
RR-LPP-18	RR-354, AS-033	Concerns that the novel Schedule 8 and Article 5 provisions fall outside section 120(5) of the Planning Act 2008 and are ultra vires, including the reallocation of abstraction entitlements between undertakers and subjecting the Environment Agency's statutory functions to the Applicant's consent.	Section 120 of the Planning Act 2008 (PA 2008) sets out what may be included in an order granting development consent. Section 120(3) confirms that an order may make provision relating to, or to matters ancillary to, the development for which consent is granted. It is clear, therefore, that a DCO is not constrained only by the specific development being authorised, but may, and is expected to, make provision for elements beyond and supporting the development.

Reference	RR references	Summary of issue raised	The Applicant's response
			Section 120(5)(a) further provides specifically that an order granting development consent may 'apply, modify or exclude a statutory provision which relates to any matter for which provision may be made in the order;' Far from being ultra vires, the draft DCO [APP-023] makes effective use of the provisions of section 120 to give effect to the intended purpose of the Planning Act 2008, namely to provide a 'one stop shop' for the key consents, authorisations and other matters needed to implement nationally significant infrastructure projects.
RR-LPP-19	RR-354	Concern over the fettering of the Environment Agency's enforcement discretion under the draft DCO without clear statutory authority.	Part 4 of the Environmental Permitting (England and Wales) Regulations 2016 (the EP Regulations) provides for the enforcement and offences relating to environmental permits. Schedule 8 makes no modification of Part 4 of the EP Regulations and therefore does not restrict or limit the Environment Agency's power to enforce a breach of environmental permit, affect the offences created, or modify the penalties and enforcement undertakings. Regulation 37 provides that the Environment Agency may suspend an environmental permit by serving a suspension notice on the operator. The effect of such a notice is that the environmental permit ceases to have effect to the extent stated in the notice, until the notice is withdrawn (Regulation 37(10). The modification made by paragraph 25 of Schedule 8 secures the permit for the discharge of the recycled water from unilateral revocation where there is no breach of that permit. This secures the sustainable supply of recycled water as a public water supply for as long as it is required, but in no way limits the action that the Environment Agency may take in the event the conditions of the permit were breached.
RR-LPP-20	RR-354	Suggestion that the section 35 Direction from the Secretary of State is relevant to the question of whether the Project is ultra vires, on the basis that the Project is an NSIP by direction rather than by statutory threshold and the Secretary of State expressly found it does not fall within the statutory definition of a nationally significant infrastructure project.	Section 1.4.8 of the Planning Policy Statement [APP-056] sets out the reasons for the Secretary of State issuing the s35 direction.
RR-LPP-21	RR-354	A suggestion that the implications of section 32(2) of the Planning Act 2008, which does not deem a change in what is stored in a reservoir as development, should be examined.	Section 32(1) of the PA 2008 is clear that 'development' subject to subsections (2) and (3), has the same meaning as it has in the Town and Country Planning Act 1990. Subsection (2) deals with specific cases that are not of relevance to the application (changes of use to generating stations, uses of underground strata for the storage of gas and increases to airport capacity). Subsection (3) clarifies that certain operations relating to certain heritage designations are to be treated as 'development' to the extent they would not otherwise be. Neither of those subsections is relevant to the Project's proposed use of the Havant Thicket Reservoir infrastructure. Please also refer to response RR-LPP-24 regarding the powers sought in the draft DCO [APP-023] in relation to Havant Thicket Reservoir.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-LPP-22	RR-354	A suggestion that planning conditions should be used to address regulatory gaps, including a biannual independent expert panel audit of the WRP and pre-commencement conditions for sewer catchment risk assessment and hazard control.	Please refer to RR-LPP-03. The Applicant does not consider this to be an appropriate suggestion. Paragraph 3.8.3 of the National Policy Statement for Water Resources Infrastructure confirms that the Secretary of State "should work on the assumption that, in terms of the control and enforcement, the relevant pollution control or other consenting regime will be properly applied and enforced. Decisions under the Planning Act should complement but not duplicate those taken under the relevant pollution control regime" [emphasis added]. Accordingly, the Examination should also assume that the environmental permit will effectively control the risk of impacts from this discharge. DCO requirements (which are equivalent to planning conditions) cannot be used to plug perceived gaps in other regulatory regimes and must be related to planning, drawing on e.g. para. 4.37 of Planning Act 2008: Guidance on preparing an application: Part 3 - Contents of the draft DCO and the relevant paragraphs of the NPPF/PPG to which it refers.
RR-LPP-23	RR-354	Suggestions that planning conditions should control parameters of concern in discharges where the Environment Agency cannot adequately control them through the discharge permit, particularly where no Environmental Quality Standard exists.	Please refer to RR-LPP-22. The water quality of the output from the water recycling plant will be controlled by and managed in accordance with the environmental permit. Paragraph 3.8.3 of the National Policy Statement for Water Resources Infrastructure confirms that the Secretary of State "*should work on the assumption that, in terms of the control and enforcement, the relevant pollution control or other consenting regime will be properly applied and enforced. Decisions under the Planning Act should complement but not duplicate those taken under the relevant pollution control regime*" [emphasis added]. Accordingly, it would not be appropriate for Schedule 2 to the draft DCO [APP-023] to include any Requirement relating to the quality of the water to be discharged into the reservoir.
RR-LPP-24	RR-354	Concern that the use of and storage in Havant Thicket Reservoir, and the use of the Bedhampton Springs to Havant Thicket Reservoir pipeline, are not among the matters itemised as the Principal Development in the varied section 35 Direction.	The use of pipelines between Bedhampton Springs and Havant Thicket Reservoir forms part of the 'Principal Development' as set out in the varied section 35 direction from the Secretary of State. The use of Havant Thicket Reservoir is an ancillary matter under the varied s35 direction. The draft DCO [APP-023] makes provision for the use, enjoyment and operation of the 'Havant Thicket Reservoir infrastructure', with such provisions made pursuant to section 120(3) of the PA 2008.
RR-LPP-25	RR-354	Concern over the inconsistency between the section 56 notice, which describes the Project as including use of Havant Thicket Reservoir and Portsmouth Water's spring water pipeline, and the narrower Principal Development itemised in the section 35 Direction.	See response to RR-LPP-24.

Table 2-19 Summary of issues raised on the theme of location of AGP and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-LAG-01	RR-354-548	Concerns over the robustness of the site selection process for the Above Ground Plant (AGP) zones presented at the Summer 2022 Consultation.	The Summer 2022 Consultation consulted on the process to identify, evaluate and select wider zones for the AGP. Sites within these wider zones were consulted on at the Summer 2024 Consultation. The AGP zones were informed by the location of the pipeline corridors and hydraulic modelling and calculations. Once zones were identified, an evaluation was undertaken to identify any constrains that may pose risks in terms of deliverability and conflicts with relevant planning and environmental legislation, regulations and policy. Section 4 of the Scheme Development Report – 1 of 3 documents [APP-073] sets out the process that was undertaken to identify, evaluate and select the AGP zones.

Table 2-20 Summary of issues raised on the theme of location of the proposed pipeline routes and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-PPR-01	RR-132, RR-193, RR-282	Objections to the proposed pipeline route through livery yards and grazing fields, including Ash House Farm at Sandy Lane, Waltham Chase.	The Applicant has noted these comments. The process taken to locate the pipelines is set out in the Scheme Development Report [APP-073, APP-074, APP-075]. The Applicant has had regard to all feedback received through consultation. In some cases it has not been possible to implement design changes proposed by stakeholders without introducing additional technical or environmental impacts. All design refinements have been made considering potential technical and environmental implications. The Applicant refers to the Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091] which outlines the analysis undertaken to assess the potential impacts on farming activities and businesses. The Applicant notes that the majority of the effects would be temporary and arise from the installation of the pipelines, as well as construction compounds. Once construction has been completed, the land would be returned to its pre-existing agricultural land use as far as reasonably practicable. The Outline Construction Environmental 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) sets out further details regarding mitigation measures which would be implemented during construction. Those affected by compulsory acquisition or temporary possession under the Development Consent Order (DCO) may be entitled to compensation in line with the Compensation Code and relevant statutory provisions. The Applicant would only exercise the compulsory acquisition and temporary use powers over land actually required to deliver the authorised development. With regards to Ash House Farm, Sandy Lane, the pipeline location in this area is constrained by existing residential homes and gardens and protected species, which the Project has sought to avoid.
RR-PPR-02	RR-132, RR-193, RR-282	Requests that the Applicant fully investigates and demonstrates that all alternative pipeline routes and construction methods have been considered, including routes that avoid grazing land and livery yards.	

Reference	RR references	Summary of 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 authorised development.
RR-PPR-03	RR-233	Concerns about the proposed pipeline route, its impact on income and management of property during works, and the longer-term impact of pipeline easement on future property development and value.	The Applicant refers to the ES Chapter 12 Land use and agriculture [APP-091] which outlines the analysis undertaken to assess the potential impacts on farming activities and businesses. The Applicant notes that the majority of the effects would be temporary and arise from the installation of the pipelines, as well as construction compounds. Once construction has been completed, the land would be returned to its pre-existing agricultural land use as far as reasonably practicable. 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 further details regarding mitigation measures which would be implemented during construction. 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, 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-PPR-04	RR-237	Question raised about what the blue-coloured planning development area shown on notices will involve and what else may affect the property.	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. This comment references the site notices

Reference	RR references	Summary of issue raised	The Applicant's response
			that were used where there was unregistered land within the Order Limits. Site notices were affixed on, or adjacent to the unregistered land, in order to notify any unregistered interested parties of the Project. The Applicant confirms that details of the extent of the Order Limits and proposed works can be found in the Works Plans [AS-007, AS-008 and APP-014] and Land Plans [AS-004, AS-005 and AS-006].
RR-PPR-05	RR-354	Concerns about the significant environmental and biodiversity impact of a pipeline of over 40km cut through the countryside from Portsdown Hill to Otterbourne, including four river crossings and excavation through hundreds of fields and hedgerows.	The process taken to locate the pipelines is set out in the Scheme Development Report [APP-073, APP-074, APP-075]. The design of the pipelines has sought to reduce impacts on the environment, and trenchless construction techniques would be used to avoid surface level works in sensitive areas, such as at the River Meon and River Hamble. Reduced working widths will also be implemented at certain locations to limit habitat loss and vegetation removal (including hedgerows). The locations where trenchless construction and reduced working widths will be implemented 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) sets out the measures that would be implemented to avoid and reduce environmental impacts during construction. Further, where the removal of vegetation cannot be avoided, reinstatement planting will be undertaken as per GDP_13 (see the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1).
RR-PPR-06	RR-354	Historic comments made at the Summer 2022 Consultation on the pipeline corridor sections, including route selection process, preferences between open cut and tunnel options, community and infrastructure impacts, environmental and heritage constraints, and detailed routing considerations.	The Applicant has noted these comments. The Scheme Development Report [APP-073, APP-074, APP-075] sets out how the Project has evolved in detail, with section 5 reporting on Project refinement following the Summer 2022 Consultation. Consultation Report Appendix C.16 Summer 2022 Consultation Response to Feedback Report (see the Consultation Report Appendix C – Non Statutory Summer 2022 Consultation 3 of 3 Documents [APP-035]) contains the Applicant's responses to feedback received from the Summer 2022 Consultation. The ES [APP-080 to APP-411] sets out the environmental assessment of the Project.

Table 2-21 Summary of issues raised on the theme of location of the WRP and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-LWRP-01	RR-018, RR-129, RR-354	Concerns that the alternative site assessment for the Water Recycling Plant (WRP) was inadequate, lacked robustness, transparency and detail, and that scoring was not made public to enable scrutiny.	The Scheme Development Report [APP-073, APP-074, APP-075] sets out the various stages of WRP site selection that was undertaken for the Project. This comprises: • The initial site selection as part of the Options Appraisal Process undertaken in 2021 to inform the Regulators' Alliance for Progressing Infrastructure Development (RAPID) Gate 2 submission. The initial site

Reference	RR references	Summary of issue raised	The Applicant's response
			selection applied a number of levels of criteria as set out in paragraph 3.2.5 of the Scheme Development Report – 1 of 3 documents [APP-073]. • Prior to the Summer 2022 Consultation, the site selection process as described above was re-run to reflect the change in the minimum site size of the WRP given the output of the WRP had been revised. This is shown in Table 5-22 of the Scheme Development Report – 1 of 3 documents [APP-073]. • A review of the site selection was undertaken in 2023, having regard to comments and objections on the location of the WRP at the Summer 2022 Consultation, and the outcome of this review formed part of the Summer 2024 Consultation. This considered all sites that had been identified through the previous iterations of the WRP site selection to ensure that all potential sites were included in the review. This review is set out in Appendix E of the Scheme Development Report – 3 of 3 documents [APP-075]. Through the above site selection processes, the Applicant has considered all potential sites within the search area, and has presented the justification for why sites were not considered to be the preferred option. All site selection approaches have resulted in site WRP_72 (the WRP site) being identified as the site that performs best against the applied criteria.
RR-LWRP-02	RR-018, RR-129, RR-354	Concerns that the mitigation hierarchy was not followed in site selection, as lower risk alternative sites were available that would have avoided risks to Langstone Harbour.	The Development Consent Order (DCO) application includes a Habitats Regulations Assessment - Stage 2 Appropriate Assessment and Marine Conservation Zone - Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2), which assesses the potential for impacts to the integrity of Habitats Sites, including the Chichester and Langstone Harbours SPA and Ramsar and Solent Maritime Special Area of Conservation (SAC). The assessment concludes that subject to the application of secured mitigation and management commitments, the Project would not result in an adverse effect on the integrity of the Habitats Sites. As well as this, the site selection for the WRP followed the mitigation hierarchy by considering a wide range of environmental, planning and engineering criteria. This approach sought to avoid sites that had the greatest potential for avoiding environmental impacts. This is demonstrated by the fact that the site selection process has avoided designated ecological sites, land at risk of flooding, land within protected landscape designations, open green space, and sites in close proximity to residential properties. The proposed site for the WRP is considered to have reduced potential for impacts compared to alternative options for a number of reasons, including: • It is not located on land that is at risk of flooding • It is on a site that experiences low use of qualifying species for the Special Protection Area (see Habitats Regulations Assessment - Stage 2 Appropriate Assessment and Marine Conservation Zone - Stage 1 Assessment [APP-053].

Reference	RR references	Summary of issue raised	The Applicant's response
			• It would not result in the displacement of existing employment development. The Project has developed a mitigation strategy for ensuring impacts relating to land affected by potential ground contamination, as set out in the Outline Construction Environmental 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).
RR-LWRP-03	RR-018, RR-028, RR-281, RR-129, RR-172, RR-294, RR-306, RR-354	Objections to siting the WRP on the former Broadmarsh landfill (Site 72) due to contamination, leachate, actively gassing conditions and settlement risks, with statements questioning the site's suitability.	The Applicant acknowledges that the WRP site is located on land affected by potential ground contamination. The principle of built development at the WRP site is demonstrated through its allocation for employment development in the Havant Borough Council (HBC) Allocations Plan (2014), and through the granting of the previous planning permission for employment uses. The Project has developed a mitigation strategy for ensuring impacts relating to land affected by potential ground contamination are reduced, as 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). This approach has been agreed in principle with the Environment Agency, HBC and Natural England, pending their review of the documentation set out in the DCO application. As set out in RR-LWRP-01 and RR-LWRP-02, the Applicant has undertaken an extensive site selection process, which considered that the WRP site is the best performing site out of all the options that were considered.
RR-LWRP-04	RR-028, RR-172, RR-294, RR-354	Concerns over the proximity of the WRP to Langstone Harbour SPA, SAC, Ramsar and SSSI and the risk of pollution to internationally protected coastal waters.	The DCO application includes a Habitats Regulations Assessment - Stage 2 Appropriate Assessment and Marine Conservation Zone - Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2), which assesses the potential for impacts to the integrity of Habitats Sites, including the Chichester and Langstone Harbours SPA and Ramsar and Solent Maritime SAC. The assessment concludes that subject to the application of secured mitigation and management commitments, the Project would not result in an adverse effect on the integrity of the Habitats Sites. As set out in RR-LWRP-01 and RR-LWRP-02, the Applicant has undertaken an extensive site selection process, which considered that the WRP site is the best performing site out of all the options that were considered. The output of the WRP, including the discharge of the reject stream through the Eastney Long Sea Outfall, will be subject to an environmental permit issued by the Environment Agency, which is the regulatory regime for controlling pollution risk.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-LWRP-05	RR-129, RR-354	Suggestions that the 1.5km search radius around Budds Farm Wastewater Treatment Works (WTW) was an unjustified constraint that shaped the site selection outcome, given that transfer requires pumping regardless.	A key component of the site selection for the WRP was the search area from Budds Farm WTW. A maximum search radius of 1.5km was applied. The Scheme Development Report [APP-073, APP-074, APP-075] sets out that proximity to Budds Farm WTW is a key requirement in order to reduce the distance for the transfer of treated wastewater to the WRP as this would minimise carbon emissions associated with constructing the pipelines and pumping water between Budds Farm WTW and the WRP. A shorter transfer distance would also reduce the number of land interests that would potentially be impacted during the construction and operation of the pipeline through disturbance and acquisition of rights. 1.5km was determined to be an appropriate maximum search radius as this balances proximity to Budds Farm WTW with identifying a reasonable number of potential developable sites. This radius for the search area was reached by reviewing the number of parcels identified at 500m, followed by 1km and 1.5km. Compared to 500m and 1km search radii, 1.5km generated a suitable number of potentially developable sites for the WRP, whilst avoiding the disbenefits of locating the WRP a greater distance from Budds Farm WTW.
RR-LWRP-06	RR-354	Suggestions that an alternative WRP location at or near Peel Common WTW or in the Fareham area would be closer to where the water is needed, reduce pipeline length and carbon footprint, and avoid coastal protected sites.	Solely utilising Peel Common WTW as a source of treated wastewater for water recycling would not produce the volume of recycled water required as determined by the emerging Water Resources Management Plan (WRMP) 24. An option that utilises treated wastewater from Peel Common WTW and Budds Farm WTW was considered (Option B.5), however the Project was selected in favour of this option due to the greater resilience associated with the use of Havant Thicket Reservoir.
RR-LWRP-07	RR-354	Concerns that potentially lower-risk alternative sites (including WRP_154, WRP_157 and WRP_158) were dismissed without adequate justification.	The Applicant acknowledges that sites WRP_154, WRP_157 and WRP_158 as shown in Figure 5.1 in Appendix E of the Scheme Development Report – 3 of 3 documents [APP-075] have low environmental risks. However, these sites comprise existing employment development which would need to be displaced and demolished prior to the development of the WRP. As a result, these sites were not considered as favourable as the proposed WRP site which is undeveloped.
RR-LWRP-08	RR-354	Concerns over the Red/Amber/Green assessment being too coarse to distinguish sites and the anomalous 'green' Constructability and Engineering score given to the contaminated landfill Site 72.	To identify a preferred site for the WRP, the Applicant balanced a range of environmental, planning and engineering criteria, considering national planning policy. Therefore, sites were not purely distinguished based on their red, amber or green scoring, instead various matters were weighed against each other to enable a comprehensive conclusion that took account of a range of factors. As set out in Table 3.2 in Appendix E of the Scheme Development Report – 3 of 3 documents [APP-075], WRP_72 scored amber in the environmental review, which was the criteria that considered land affected by potential contamination, not the constructability and engineering criteria.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-LWRP-09	RR-354	Concerns that the long list of sites was reduced without sufficient explanation of why individual sites were rejected, undermining the ability to comment on the site selection process.	Paragraph 3.2.11 of the Scheme Development Report – 1 of 3 documents [APP-073] sets out the criteria that were applied to refine the long list of parcels to the short list in the initial site selection. This included reviewing whether sites were located within or adjacent to ecological designations, landscape designations or would pose adverse impacts to residential properties and community facilities. The review of the WRP site selection in Appendix E of the Scheme Development Report – 3 of 3 documents [APP-075] also presents a detailed evaluation for all sites that were taken through the WRP site selection process, providing a clear justification for why sites were not progressed.
RR-LWRP-10	RR-300, RR-354	Objections to the location of the WRP due to proximity to residential areas including Old Bedhampton Conservation Area and Bedhampton.	The selected WRP site is considered to be the optimal option, taking into account environmental impacts, deliverability and proximity to residential properties. Sites that were further from residential properties and the Conservation Area performed poorer against other criteria. The Scheme Development Report [APP-073, APP-074, APP-075] sets out the various stages of WRP site selection that was undertaken for the Project. Environmental Statement (ES) Chapter 13 Landscape and visual [APP-092] sets out that views of the WRP site from the north (from Havant and Bedhampton) are screened by the A27, the slopes of which are densely vegetated with trees and scrub. The chapter does not report significant effects on residents of Havant and Bedhampton as a result of development of the WRP site. ES Chapter 7 Archaeology and cultural heritage (Document reference 6.1, DCO Volume 6, Version 1) does not report any effects on the Old Bedhampton Conservation Area as a result of the development of the WRP site.
RR-LWRP-11	RR-354	Concerns over the landscape and visual impact of siting the WRP on a raised landfill mound adjacent to Langstone Harbour, with above-ground structures highly visible from multiple key viewpoints and screening planting expected to fail.	ES Chapter 13 Landscape and visual [APP-092] considered a number of viewpoints from Langstone Harbour as shown is ES Figure 13.22 Representative viewpoint [APP-327]. No residential effects are reported on views from these locations. The implementation of screening planting will be managed in accordance with the Outline Landscape and Ecology Management Plan [APP-420]. This includes measures in the event that planting fails, such as the remediation of soils and using other suitable species. Planting will be managed following planting to ensure establishment.
RR-LWRP-12	RR-354	Concerns that the 2022 consultation demonstrated a lack of public support for locating the WRP at Site 72, with 41% of respondents not supporting the proposed location.	The Applicant had regard to feedback to the Summer 2022 Consultation by undertaking a further detailed review of the WRP site selection, which is set out in Appendix E of the Scheme Development Report – 3 of 3 documents [APP-075]. This review concluded that WRP_72 remained the preferred site for the WRP.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-LWRP-13	RR-354	Concerns over the cost, engineering difficulty and environmental impact of developing the WRP and associated tunnel/pipeline launch pits on the Broadmarsh landfill site.	See response to RR-LWRP-03 which sets out the approach to mitigating potential effects associated with this land potentially affected by contamination. The Applicant considered best value criteria when undertaking the WRP site selection, however this was balanced alongside environmental, planning and technical criteria.
RR-LWRP-14	RR-354	Concerns over the site selection for the High Lift Pumping Station on the Broadmarsh landfill, including the flawed scoring process, concerns about the cost, complexity and long term operational difficulty of developing on a contaminated landfill site, and inadequate consideration of alternative sites.	The High Lift Pumping Station forms part of the WRP site and provides pumping for the first section of the Pipeline between the WRP site and Otterbourne Water Supply Works (WSW). The site selection for the High Lift Pumping Station took place alongside the site selection for the WRP, as set out from paragraph 3.2.20 to 3.2.26 of the Scheme Development Report – 1 of 3 documents [APP-073]. Site S_HLPS_17 was selected as the preferred site. This was the same site proposed for the WRP. Locating the High Lift Pumping Station at the same site as the WRP would reduce the need for multiple sites and therefore reduce overall construction and operation phase impacts.
RR-LWRP-15	RR-354	Comment that the alternative site assessment and WRP site selection should be treated as a Principal Issue for examination by the Examining Authority.	The Applicant has noted that alternatives are identified within the Initial Assessment of Principal Issues and welcomes the opportunity to respond to any further questions raised by the Examining Authority during the examination.
RR-LWRP-16	RR-354	Concerns that the site selection process does not meet the requirements of the Environmental Impact Assessment Regulations 2017 (Schedule 4, paragraph 2) and NPS WRI in respect of comparing reasonable alternatives and setting out reasons for selecting the chosen option.	The Project meets the requirements of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Reasonable alternatives in terms of design, technology, location, size and scale have been considered and are presented in the Scheme Development Report [APP-073, APP-074, APP-075] and ES Chapter 4 Consideration of alternatives [APP-083] which set out in detail the process the Applicant has undertaken to develop the Project and select a site for the WRP.
RR-LWRP-17	RR-354	Concerns over the proximity of the WRP to the coast and the adequacy of proposed mitigation for coastal receptors.	The DCO application includes a Habitats Regulations Assessment - Stage 2 Appropriate Assessment and Marine Conservation Zone - Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2), which assesses the potential for impacts to the integrity of Habitats Sites, including the Chichester and Langstone Harbours SPA and Ramsar and Solent Maritime SAC. The assessment concludes that subject to the application of secured mitigation and management commitments, the Project would not result in an adverse effect on the integrity of the Habitats Sites.
RR-LWRP-18	RR-354	Concerns over insufficient time to review the Outline Construction Environmental Management Plan and supporting documents related to the siting of the WRP on the Broadmarsh landfill.	Outline Construction Environmental 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) and other relevant application documents were submitted as part of the DCO application and have been available for review in accordance with the statutory process. The Applicant notes that there are further opportunities for interested parties to comment on the application during the examination.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-LWRP-19	RR-354	Suggestions that a WRP located at Peel Common could support Portsmouth Water's works at Gaters Mill and help address discharge pollution issues in the upper Itchen estuary affecting salmon migration.	See response to RR-LWRP-06.
RR-LWRP-20	RR-354	Concerns that the minimum land parcel size used in the site assessment changed over time, and that the availability of land at Budds Farm WTW and existing employment permissions at Site 72 were not clearly factored into the assessment.	The review of the WRP site selection (set out in Appendix E of the Scheme Development Report – 3 of 3 documents [APP-075]) reverted the minimum parcel size to the smallest area considered throughout the development of the Project, so that this review considered all reasonable land parcels. The Applicant considered the potential for the Budds Farm WTW to be used for the WRP site, as set out in Section 5.7 of Appendix E of the Scheme Development Report – 3 of 3 documents [APP-075]. This option was discounted due to the significant constraints which would require the redevelopment of the WTW and would constrain future upgrades to the WTW. Much of the land at Budds Farm WTW is also at risk of flooding and directly adjacent to Langstone Harbour The Applicant has had regard to the current allocation of the WRP site in the adopted local plan and the previous planning permissions for employment use. That permission has now expired and the Emerging New Local Plan Building a Better Future (Regulation 19) (2026) consultation proposes the removal of the employment allocation identifying that employment needs can be met on other sites. HBC, as reflected in the draft SoCG (Document reference 5.8, DCO Volume 5, Version 1) have confirmed that the principle of the WRP development is appropriate on the site: "*The WRP site is currently allocated in the development plan under Policy BD11 for employment use, led to a planning consent which is now elapsed. Emerging plan does not propose allocation for employment use. In the meantime, the commitments through the Outline SEP provide appropriate mitigation. HBC agrees that the principle of use of the site for the WRP site is appropriate and the site selection methodology presented by the Applicant which has led to the identification of the WRP site was robust*". The anticipated extent of the operational phase of the WRP was factored into the design of the site, and therefore the highlighted risks. Table 11-46 in ES Chapter 11 Land quality and ground conditions [APP-090] sets out measures that will be implemented to ensure that effects are reduced. ES Chapter 11 Land quality and ground conditions [APP-090] reports minor adverse effects which are not significant during the operational phase.
RR-LWRP-21	RR-354	Concerns that the 60-year design life of the WRP was not adequately considered against ongoing ground settlement and landfill risks at Site 72.	

Table 2-22 Summary of issues raised on the theme of major accidents and disasters and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-MAD-01	RR-354	A comment noting the position of the Environment Agency in the Statement of Common Ground regarding washout design and mitigation, subject to review of ES Chapter 14.	The Applicant acknowledges the respondent's feedback regarding the Environment Agency's position on washout design and mitigation. The Applicant is actively engaging and collaborating with the Environment Agency to discuss this matter and to ensure that washout design and associated mitigation measures are appropriately addressed. Please refer to the Applicant's response to RR-102-15 for the response to the Environment Agency's representation on this matter.
RR-MAD-02	RR-354	A comment supporting the inclusion of Control of operational impacts (PMIE-13) as an examination topic, including procedures in the event of system failure and operational impacts on local watercourses, the Solent and Havant Thicket Reservoir.	The Applicant acknowledges the respondent's feedback supporting the inclusion of Control of operational impacts as an examination topic, including procedures in the event of system failure and operational impacts on local watercourses, the Solent and Havant Thicket Reservoir. The procedures are set out in the Operational Environmental Management Plan [APP-422].

Table 2-23 Summary of issues raised on the theme of marine biodiversity and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-MBIO-01	RR-242, RR-300	General concerns over pollution of sea water and the impact on marine life.	The Applicant has embedded measures, such as pollution control measures and good construction site management practices, as set out in the Outline Construction Environmental Management Plan (CEMP) (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) for reducing any pollution events and minimising impacts on marine life during construction. There are also measures pertinent for the water environment when working in Flood Zone 2 or 3 to reduce pollution risk from construction runoff during periods of extreme weather to protect marine life from potential pollution to coastal waters. These measures are set out in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) that would be carried forward and developed into a detailed CEMP prior to the commencement of construction of the Project. The Environment Statement (ES) Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) also assesses the discharge at the Eastney Long Sea Outfall (LSO) during operation and concludes that there would be no significant changes between the existing discharge at the LSO and addition of reject water from the Water Recycling Plant (WRP). The Applicant has also set out management and control measures during operation that would be in place to avoid potential pollution events, as described in the Operational Environmental Management Plan [APP-422].
RR-MBIO-02	RR-248, RR-354	Concern over the discharge of concentrated reject water containing PFAS and other persistent contaminants through the Eastney Long Sea Outfall, and the	Water quality modelling and assessment, informed by H1 assessment methodology and currently regulated Environmental Quality Standard (EQS),

Reference	RR references	Summary of issue raised	The Applicant's response
		risk of a persistent chemical burden in the Solent, Langstone Harbour, coastal sediments, protected habitats and marine food chains.	has demonstrated that there would be no significant changes between the existing discharge at the Eastney LSO and the proposed combined discharge, which would include reject water from the WRP. The results are presented in ES Appendix 19.5 Eastney LSO Solent dispersion modelling [APP-200]. The modelling demonstrates that there would be no change to the existing effect the Eastney LSO has on the Solent and adjoining water bodies, including Langstone Harbour. Two well-publicised academic studies have measured a range of PFAS and PPCPs in water affected by Combined Sewer Overflow (CSO) discharges in Langstone Harbour. These studies were informed by sampling of sea water undertaken by the authors of the studies (i.e., independently of Southern Water) in the vicinity of the Budds Farm stormwater CSO: • Ford and Ginley (2024) collected samples of sea water from the scour pool at the end of Budds Farm CSO No.2 during low tide conditions. This included samples collected on 15th April 2024, following a period of eight days without CSO discharges, and 29th April, following a period of over 50 hours of continuous discharge from the CSO and approximately seven hours (one complete outgoing tide) after cessation of the discharge. • Uhlhorn et al. (2025) also collected samples of sea water adjacent to the end of Budds Farm CSO No.2 as part of a wider sampling exercise that considered 21 locations in Langstone and Chichester Harbours. Samples from the Budds Farm CSO location were collected between 25 and 29 March (representing a period of relatively low rainfall), 25 and 29 August (in response to an observed discharge) and 11 and 15 November (representing a period of relatively high rainfall) 2022. The Applicant's pilot plant data has been compared to the Uhlhorn et al. (2025) PPCP dataset and the Ford and Ginley (2024) PFAS dataset. The concentrations of analytes from the pilot plant were all significantly lower than the equivalent data from the Uhlhorn et al. (2025) and Ford and Ginley (2024) studies, reflecting the effectiveness of the water recycling process in removing most Contaminants of Emerging Concern (CECs). The results of the pilot study clearly demonstrate that CEC concentrations in the recycled water are considerably lower than those in the treated effluent from Budds Farm WTW that is currently released under a permitted discharge into the Solent via Eastney LSO. Furthermore, the results also demonstrate that CEC concentrations in the recycled water from the pilot plant are also lower than the concentrations measured in Langstone Harbour, which represents the best available indication of CEC concentrations in the receiving environment. This suggests that releases from the WRP are unlikely to result in any significant adverse effects on water quality in Langstone Harbour or the Solent, particularly given that the pilot plant data does not represent the full treatment process that would be in place at the WRP. Please also refer to the Applicant's response to RR-WRPR-03 for further information.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-MBIO-03	RR-354	Historic concern over the likely significant effect on the marine environment identified in the Preliminary Environmental Information Report, and the need to understand environmental risks including in-combination impacts with other discharges into the Solent before the Project proceeds.	In the Preliminary Environmental Information (PEI) Report, the assessment of likely significant effects on the marine environment was based on the worst-case assumption that a significant effect from the LSO discharge on the marine environment could not be ruled out when there had not been any dispersion modelling result. However, the dispersion modelling (which was not available at the time of the PEI Report) have now been undertaken and presented in ES Appendix 19.5 Eastney Long Sea Outfall Solent dispersion modelling [APP-200]. The ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) [APP-098] concludes that there would be insignificant changes between the existing release at the Eastney LSO and the proposed combined release which includes reject water from the WRP. Therefore, it is concluded in the ES Chapter 9 Marine biodiversity (Document reference 6.1, DCO Volume 6, Version 1) [APP-088] that there would not be any likely significant effect on the marine environment. The Cumulative Effects Assessment (CEA), set out ES Appendix 20.2 CEA [APP-209], includes the assessment of the interrelationship between the Project and other marine applications in section 1.7. The assessment concludes there are no residual likely significant cumulative effects identified. ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) provides the assessment of reject water from the Water Recycling Plant being released into the sea via the Eastney LSO. Paragraphs 19.8.90 to 19.8.94 conclude the changes in water quality parameters and salinity are insignificant, and would not result in any changes to water quality and changes would not extend into connected water bodies such as Langstone Harbour or the tidally influenced Hermitage Stream. Table 19-62 provides the assessment of chemical release from the combined discharge at Eastney LSO and concludes changes in the currently consented parameters would be insignificant compared to natural variation experienced within the receiving water or within variations experienced within the wastewater itself. Significant changes to water quality associated with the currently consented parameters at Eastney LSO are not predicted. The discharge of reject water via the Eastney LSO will also be subject to an environmental permit. Paragraph 3.8.3 of the National Policy Statement for Water Resources Infrastructure confirms that the Secretary of State 'should work on the assumption that, in terms of the control and enforcement, the relevant pollution control or other consenting regime will be properly applied and enforced. Decisions under the Planning Act should complement *but not duplicate* those taken under the relevant pollution control regime'. Accordingly, the Examination should also assume that the environmental permit will effectively control the risk of impacts, including cumulatively, from this discharge.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-MBIO-04	RR-354	Concerns over the risk of bioaccumulation of persistent contaminants such as PFAS in sediments, plants and animals in Langstone Harbour and the Solent, and the need for the Applicant to assess bioaccumulation risks including impacts from concentrated reject water released via the Eastney Long Sea Outfall.	The Applicant acknowledges that there are no EQS for the majority of PFAS (with the exception of perfluorooctane sulfonic acid (PFOS), which has an EQS under the Water Framework Directive (Standards and Classification) Directions (England and Wales) 2015 and other CECs. However, the Applicant can confirm that it is engaging with the Environment Agency's National Permitting Service to ensure that CECs are robustly considered as part of the discharge consent application process. Further information on the pilot plant investigation is provided in the Applicant's response to RR-WQH-04. Please also see the Applicant's response to RR-MBIO-02. With respect to chemicals in the Eastney LSO discharge (ES Appendix 19.8 CORMIX Modelling for Chemicals Screened in via the Surface Water Risk Assessment Process [APP-203]), the distance at which the EQS for the parameters screened in has been calculated as being 1-2m from the outfall thus indicating that the LSO discharge will be rapidly diluted with 2m of the outfall location. Furthermore, although these compounds being screened in for potential risk are persistent in marine sediments and may have the potential to bioaccumulate in higher trophic levels, bioaccumulation is unlikely to be significant at EQS levels, and this does not alter the total annual output. Therefore, the potential for bioaccumulation is considered unlikely to be significant and the scale of change in bioaccumulation is considered to be negligible.
RR-MBIO-05	RR-266	Concern that the Project does not eliminate wastewater discharge to the marine environment, as pollutants removed during the water recycling process will be returned to sea in a more highly concentrated reject stream via Eastney Long Sea Outfall.	As stated in the response to RR-MBIO-02, model outputs show that the differences in the Solent with respect to Budds Farm WTW discharge between the existing scenario and the operational Project scenario are insignificant (ES Appendix 19.5 Eastney LSO dispersion modelling [APP-200]). With respect to chemicals in the LSO discharge (ES Appendix 19.8 CORMIX modelling for chemicals screened in via the surface water risk assessment process [APP-203]), the distance at which the EQS for the parameters screened in has been calculated as being 1-2m from the outfall thus indicating rapid dilution at the outfall location. The proposed combined release which includes reject water from the WRP would not result in any changes to water quality in the Solent.

Table 2-24 Summary of issues raised on the theme of need case and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-NC-01	RR-010, RR-014, RR-017, RR-027, RR-055, RR-124, RR-136, RR-141, RR-152, RR-194, RR-199, RR-225, RR-231, RR-254, RR-261, RR-263, RR-265, RR-291, RR-304, RR-324, RR-337, RR-350	Support for the Project on the basis of the need to protect chalk streams and reduce over abstraction from the Itchen and Test.	The Applicant notes and welcomes these comments.
RR-NC-02	RR-019, RR-065, RR-124, RR-350	Support for the Project on the basis of the need for water supply resilience against climate change, population growth and housing demand.	The Applicant notes and welcomes these comments.
RR-NC-03	RR-078, RR-250, RR-301	General support for the need for additional water resources and water recycling infrastructure.	The Applicant notes and welcomes these comments.
RR-NC-04	RR-028, RR-066, RR-153, RR-172, RR-206, RR-234, RR-248, RR-266	Requests that the Examining Authority scrutinise whether the need for the Project, including its performance under drought conditions and its operational and capacity assumptions, has been demonstrated through clear, independently verified evidence.	The Project is firmly embedded within national, regional and company level 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 need for the project is set out within the Case for the Project (Document reference 5.6, DCO Volume 5, Version 1). These are rigorous processes that are subject to consultation and engagement. The proposition of independent verification is not a requirement of the Water Resources Management Plan (WRMP) process. Upon the imminent publication of WRMP24, the National Policy Statement for Water Resources Infrastructure (NPSWRI) is explicit that *"if a nationally significant infrastructure project is included in a water resources management plan, the 'need' for that scheme will have been demonstrated in line with government policy and the applicable statutory requirements, and 'need' would not be revisited as part of the application for development consent*" (paragraph 2.4.4).
RR-NC-05	RR-018, RR-192, RR-294, RR-354	Concerns that the Project is not present in a published final WRMP and that the need case must therefore be examined under NPS WRI paragraph 1.4.7.	The Applicant acknowledges that in advance of the publication of WRMP24, in accordance with the NPSWRI paragraph 1.4.7, where a project is not present in a final WRMP, development consent applicants will need to make the case for the need for the Project on a case by case basis. That case is duly made in the Case for the Project (Document reference 5.6, DCO Volume 5, Version 1) which sets out that the Project is firmly embedded within national, regional and company level planning and regulatory

Reference	RR references	Summary of issue raised	The Applicant's response
			frameworks and has been consistently identified as a necessary component of the solution to the Applicant's Western Area's water resources deficit. Upon the imminent publication of WRMP24, the need for the Project is not to be revisited as part of the application for development consent.
RR-NC-06	RR-066, RR-129, RR-354	Concerns that need has not been established for a water recycling plant at the Bedhampton/Havant location, given the deficit lies in the Southampton/Winchester area.	The Project is a project of national importance designed to address a critical water supply shortfall in Hampshire helping to protect sensitive chalk stream habitats. The need for the project is established through the WRMP process (see response to RR-NC-04) and options appraisal process which justifies the location of the Water Recycling Plant, pipeline route and other works. Options are not limited to those in the same geographical area of the identified deficit.
RR-NC-07	RR-294	Concerns that having relied on the Water Resources South East Final Regional Plan to establish need, the decisions and approach taken through this Project (including on reject water, contaminants without existing standards, and draft DCO mechanisms) will set the template for subsequent water recycling schemes.	As noted at paragraph 1.4.3 of the NPSWRI *"it is through the process of preparing, consulting on, and finalising the publication of ... water resources management plans that decisions are made on what additional water resources infrastructure is needed*". This is why, per paragraph 1.4.5, for "*nationally significant infrastructure projects included in a published final water resources management plan, the 'need' for that scheme has been demonstrated in line with government policy*". Each water company's WRMP will be *informed* by regional water resources plans. The Applicant's emerging WRMP24 has been fully integrated and aligned with the development of the WRSE Final Regional Plan. This does not set a precedent or template for any other water recycling schemes, it establishes the need for this Project.
RR-NC-08	RR-018, RR-095, RR-209, RR-212, RR-235, RR-354	Concerns that local water sovereignty and resilience are undermined by repurposing local assets to meet the Applicant's wider Western Area deficit with little benefit to the host area.	See response to RR-NC-06. Havant Thicket Reservoir is being developed to enable additional water supplies to be provided to the Applicant, which is why the Applicant is fully funding the reservoir over the long-term. The Project will enhance the use of the reservoir by significantly increasing its deployable output to further directly address the Applicant's water supply deficit. The draft Development Consent Order (DCO) [APP-023] ensures the water within the reservoir is safeguarded to meet the supply need for the Applicant's customers. Up to 25Ml/d is allocated to Portsmouth Water to meet an agreed supply transfer to the Applicant under an existing Bulk Supply Agreement (BSA1), with up to 90Ml/d available to the Applicant directly and an overall cap of 115Ml/d for the Applicant's supply needs.
RR-NC-09	RR-097, RR-281, RR-354	Concerns that the Applicant's demand forecasts, population growth and abstraction reform assumptions are overstated and inflate the need case.	This comment relates to the WRMP process undertaken in accordance with the Water Resources Act 1991 (as amended) and is not relevant to the determination of the DCO application. Moreover, WRMP19, which originally established the need for a large scale new water resource to meet future needs, and the imminently-to-be published WRMP24, contain all relevant underpinning data and this has not been called into question by the relevant regulators in so far as this relates to the Project. Once published, in

Reference	RR references	Summary of issue raised	The Applicant's response
			accordance with paragraph 1.4.5 of the NPSWSI, the need for the project will have been demonstrated in line with government policy.
RR-NC-10	RR-065, RR-185, RR-198, RR-214, RR-217, RR-229, RR-298, RR-300, RR-347, RR-355	Concerns that recycled water is unnecessary given the availability of local spring and aquifer supplies and that safety has not been demonstrated.	The purpose of the Project is to reduce reliance on sensitive chalk streams providing a sustainable water source that reduces the potential for environmental impacts to these sources. This is set out in the Case for the Project (Document reference 5.6, DCO Volume 5, Version 1). Local springs will be used to fill the reservoir but this is only possible in the winter months and hence recycled water is required to provide a year-round, drought resilient water supply at the scale needed. The principle of water recycling is well established and recognised in national policy, widely used around the world and supported by the Environment Agency. It is not for this Examination to consider the principle of the technology.
RR-NC-11	RR-098, RR-210, RR-300, RR-302, RR-330, RR-355	General comments on the importance of protecting water resources and the wider environment, including the value of clean water, the need for sustainable water management, and the public interest in safeguarding chalk streams and freshwater ecosystems.	The Applicant notes these comments and agrees with the importance of each of these factors.
RR-NC-12	RR-157, RR-166, RR-234, RR-354	Concerns that the Applicant's WRMP and its options appraisal are flawed and driven by profit motives rather than robust, sustainable planning.	WRMPs are prepared under Water Resources Act 1991 (as amended) through a prescribed process, and the options appraisal undertaken for the project was undertaken in line with WRMP requirements to select the best value solution from the options under consideration taking into account a range of social, economic and environmental factors. As a regulated industry, the amount of return that the Applicant can make on its investment is controlled by the water industry economic 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-NC-13	RR-128, RR-129, RR-354	Concerns that proposed mitigation and enhancement measures, including the £500,000 environmental and ecological enhancements contribution, are unclear and inadequate to offset Project impacts.	The mitigation measures proposed and secured through application are commensurate and necessary to make the Project acceptable in planning terms. The broad terms for the proposed financial contributions are set out in the Case for the Project [APP-057]. The precise measures that the funds could be spent on (administered by the relevant local authority) are subject to further discussion, will be subject to examination and will be secured via legal agreement.
RR-NC-14	RR-287, RR-354	Concerns that the WRMP investment model, drought permit reliance, zoning and screening methodology preferentially select recycling over more sustainable alternatives.	See response to RR-NC-10. Furthermore, in relation to the specific point about sustainability, water recycling is a sustainable technology. It turns highly treated wastewater into a continuous, drought-resilient water source that reduces the Applicant's dependence on the chalk aquifer and chalk streams for its water supply.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-NC-15	RR-354	Concerns that the plant location, 40km+ transfer pipeline and 365-day operation result in unacceptable carbon impact and inefficiency inconsistent with the identified need.	The Project has been subject to extensive regulatory scrutiny through the Regulators' Alliance for Progressing Infrastructure Development (RAPID) process, including detailed options appraisal, cost and benefit assessment and ongoing review of cost efficiency. At each stage, the Project has been confirmed as representing best value compared to alternative options capable of meeting the same needs. Significant efficiencies are achieved through integration with the consented Havant Thicket Reservoir scheme. By sharing infrastructure with Portsmouth Water, the Project reduces construction impacts, avoids duplication and is expected to deliver substantial cost savings compared to the delivery of standalone infrastructure. These efficiencies contribute directly to value for money for customers. The Project's carbon effects have been assessed in Environmental Statement (ES) Chapter 10 Carbon and Climate Change [APP-089]. The assessment considers whole life greenhouse gas emissions associated with construction, operation, asset replacement and decommissioning. Measures to reduce emissions during the operation of the Project design are set out in the Outline Carbon Management Plan [APP-423] and Operational Environmental Management Plan [APP-422]. Having regard to the scale of emissions, their contribution relative to national carbon budgets, and the carbon reduction measures incorporated into the Project, the Applicant concludes that the Project's operational carbon effects are not significant in Environmental Impact Assessment terms.

Table 2-25 Summary of issues raised on the theme of noise and vibration and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-NAV-01	RR-040	Concern over noise disruption during construction and operational phases of the Project.	This response relates to potential noise and vibration impacts on human receptors, as described in Environmental Statement (ES) Chapter 15 Noise and vibration [APP-094] and broadly classified as either residential dwellings or non-residential locations, such as schools, hospitals or outdoor amenity areas. Potential disturbance impacts of the Project (which include noise) on protected sites, habitats and species, including the Chichester and Langstone Harbour SPA and Ramsar site, are assessed in ES Chapter 8 Terrestrial and Freshwater Biodiversity (Document reference 6.1, DCO Volume 6, Version 1). The Applicant's response to issues raised on the theme of terrestrial and freshwater biodiversity (RR-TFB-06) provides further information on this issue. The construction and operational noise and vibration assessments, presented in ES Chapter 15 Noise and vibration [APP-094], have been completed on the basis of robust worst case assumptions, and mitigation measures proposed where significant effects are predicted in order to avoid significant effects resulting.

Reference	RR references	Summary of issue raised	The Applicant's response
			With regard to construction noise, as per the Outline Construction Environmental Management Plan (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)".* 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 the NVMP to be submitted to the relevant local planning authority for the locality 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 regard to operational noise, as noted in the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1), 'Site Specific Design Principles' (SSDPs) for the following work sites are provided: • Water Recycling Plant (WRP) site • BPT/IPS-E • IPS-F • IPS-G • BPT-K. 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 Site Specific Design Principles (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 or disturbance.
RR-NAV-02	RR-100, RR-226	Concerns over the impact of construction noise, vibration and heavy machinery on horses, including stress, risk of injury and prolonged loss of use of grazing fields.	The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) includes control measures to prevent unauthorised access to construction sites. These measures would ensure that horses are kept a sufficient distance from the works to minimise the risk that they are affected by

Reference	RR references	Summary of issue raised	The Applicant's response
			the construction works (including from noise impacts). The Outline Soil Resource Management Plan, Appendix B to the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) confirms that an Agricultural Liaison Officer (ALO) would be appointed by the Contractor 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. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) identifies a range of mitigation measures that would be used to minimise construction noise effects. 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 the Noise and Vibration Management Plan to be submitted to the relevant local planning authority for the locality for approval prior to commencement of construction. No specific assessment of construction noise effects on livestock has been undertaken as such effects would be minimised through the implementation of Best Practicable Means. Noise impacts on non-residential receptors (which includes equestrian facilities) have been assessed as reported in ES Chapter 15 Noise and vibration [APP-094] and effects are predicted to be not significant.

Table 2-26 Summary of issues raised on the theme of the Portsmouth Water's proposal and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-PWP-01	RR-077, RR-176, RR-197, RR-217	Statements of satisfaction with the quality of drinking water and service provided by Portsmouth Water.	The Applicant notes these comments.
RR-PWP-02	RR-091, RR-195, RR-335	Concerns about the potential transfer of Portsmouth Water customers to becoming the Applicant customers as a result of the Project.	Water companies are appointed by Ofwat under the Water Industry Act 1991, and operate under licences. Each company's instrument of appointment sets out the area for which the appointment is made, thereby establishing the customer base of each water undertaker. The Project does not affect any appointment of any water undertaker, nor does it alter any supply area or transfer any customers from Portsmouth Water to Southern Water.
RR-PWP-03	RR-069, RR-153, RR-192, RR-354, AS-033	Concerns about the relationship and interface between the Applicant and Portsmouth Water, including risks to Portsmouth Water's operational flexibility, abstraction and ability to meet its own future water resource requirements.	The Project has been designed to reflect agreed commercial principles between the Applicant and Portsmouth Water, and discussions are ongoing for a detailed commercial agreement to manage the operation of the Project and the Havant Thicket Reservoir. Havant Thicket Reservoir is being funded by Southern Water customers to improve resilience and meet a water supply deficit identified in Southern Water's Water Resources Management Plans (WRMPs). Schedule 8 to the draft Development Consent Order (DCO) [APP-023] seeks to ensure that the water supply required by both Southern Water

Reference	RR references	Summary of issue raised	The Applicant's response
			and Portsmouth Water is available to be abstracted from the reservoir, reflecting the agreed commercial principles. This is confirmed by the regulator Ofwat in its relevant representation [RR-232]: "The Hampshire Water Transfer and Water Recycling Project is dependent on the delivery of another strategic water infrastructure asset which is also regulated by Ofwat, the Havant Thicket Reservoir. […] This project is being delivered by Portsmouth Water for the benefit of Southern Water's customers". Please also refer to the joint statement at Appendix E to 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) which confirms the basis, in respect of water need, on which the commercial agreements have and are being negotiated.
RR-PWP-04	RR-096, RR-156, RR-161, RR-266, RR-301, RR-347	Statements of support for Portsmouth Water's original spring-water-fed reservoir proposal at Havant Thicket, including its ancillary benefits for community, wildlife, tourism and recreation.	The Applicant recognises support for Havant Thicket Reservoir and the benefits it will deliver.
RR-PWP-05	RR-009	Statement of disappointment that Portsmouth Water has permitted the Applicant to participate in the Havant Thicket Reservoir scheme.	Whilst Havant Thicket Reservoir is being built and operated by Portsmouth Water, it is being funded over the long-term by the Applicant given that the purpose of the reservoir is to enable additional water supplies to be provided to Southern Water. As confirmed by the regulator Ofwat in its relevant representation [RR-232]: "[Havant Thicket Reservoir] is being delivered by Portsmouth Water for the benefit of Southern Water's customers".
RR-PWP-06	RR-153, RR-192	Requests that planning gains and biodiversity commitments secured by Portsmouth Water through the original reservoir consent are protected if the DCO is granted.	The Project is not expected to change any of the planning obligations and biodiversity commitments secured through the planning consent for Havant Thicket Reservoir, which Portsmouth Water will be delivering.
RR-PWP-07	RR-153	Suggestion that the relationship between the Applicant and Portsmouth Water would be more appropriately managed through flexible commercial arrangements rather than permanently embedded in the DCO.	The Applicant and Portsmouth Water are currently negotiating a detailed contract for the use of Havant Thicket Reservoir for the Project. Please refer to the joint statement at Appendix E to 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 further information about the commercial arrangements that are being discussed. Notwithstanding that a commercial agreement is intended to manage the shared used of the reservoir, the provisions of article 5 to the draft DCO [APP-023] are necessary to ensure that the DCO is capable of authorising the whole of the Project, of which the storage and draw down of water using the Havant Thicket Reservoir is an integral part. It is anticipated that legal agreements between Southern Water and Portsmouth Water would regulate this interface. However, those agreements remain under negotiation. One of the key purposes of article 5 is therefore to ensure there is in place an appropriate 'backstop' that would facilitate the operation of the Project in the unlikely event

Reference	RR references	Summary of issue raised	The Applicant's response
			that those agreements are not concluded or, over the life of the Project, those agreements for whatever reason fail. As such a 'back stop' article 5 makes provision for the operational interactions between the Project and Havant Thicket Reservoir infrastructure, through the agreement of a scheme of operation or, in default of agreement, determination of the scheme of operation by the Secretary of State.
RR-PWP-08	RR-096, RR-153, RR-266, RR-335, AS-033	Statements of Portsmouth Water customer status provided as context to the representation.	The Applicant acknowledges the interest of Portsmouth Water customers in relation to Havant Thicket Reservoir infrastructure and the Project.
RR-PWP-09	RR-009	Concerns about the noise, amenity and residential impact of a Portsmouth Water pumping station, surge vessels and electrical substation being constructed close to residential properties.	A pumping station constructed by Portsmouth Water is outside the scope of this Project, with Portsmouth Water responsible for seeking their own consents.
RR-PWP-10	RR-266, RR-300, RR-321, RR-329	Concerns that the introduction of recycled water into Portsmouth Water's reservoir was not included in Portsmouth Water's original planning application.	The Applicant notes that the planning permission for Havant Thicket Reservoir does not include for the storage of recycled water. However, through the DCO application the Applicant is seeking consent to use Havant Thicket Reservoir for the storage of recycled water. The Applicant has therefore undertaken an assessment of the likely significant environmental effects of this, which is set out in the Environmental Statement [APP-080 to APP-411 – 331 documents]. Please also refer to RR-DCO-01 and RR-DCO-02.
RR-PWP-11	RR-354	Suggestion that any tunnel constructed for the Project's pipelines should be made large enough to also accommodate Portsmouth Water's reservoir pipeline, to minimise disruption and improve cost effectiveness.	At the Summer 2024 Consultation, the Applicant proposed two options for the pipelines that would transfer recycled water to Havant Thicket Reservoir. The first option comprised the use of Portsmouth Water's pipelines between Bedhampton Springs and Havant Thicket Reservoir which at the time were subject to a live planning application. The second option comprised the Applicant developing separate direct pipelines. Following the approval of Portsmouth Water's planning application, the Applicant confirmed that recycled water would be transferred to Havant Thicket Reservoir using Portsmouth Water's pipelines. This means the Applicant only needs to develop pipelines between the WRP site and Bedhampton Springs. By using Portsmouth Water's pipelines, construction disruption and costs are reduced.
RR-PWP-12	RR-249	Concern over safety risks arising from amendments to move an outlet tower inside the reservoir and add a pedestrian access bridge, including drowning risk to young children.	The Applicant notes that Havant Thicket Reservoir is a separate project being promoted and delivered by Portsmouth Water and does not form part of the Project that is the subject of this DCO application. Matters relating to the design, construction, operation and safety of Havant Thicket Reservoir, including the design of reservoir infrastructure and public access arrangements, are therefore matters for Portsmouth Water and the relevant consenting and regulatory processes applicable to that project. The Applicant has engaged, and continues to engage, with Portsmouth Water regarding matters relevant to the interface between the Project and Portsmouth Water's existing and proposed infrastructure.

Table 2-27 Summary of issues raised on the theme of principle of development and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-POD-01	RR-010, RR-017, RR-019, RR-055, RR-124, RR-141, RR-146, RR-169, RR-254, RR-261, RR-263, RR-291, RR-300, RR-304, RR-317, RR-339	Support for the Project on the basis that it is a sensible and necessary long-term water resource solution.	The Applicant notes and welcomes these comments.
RR-POD-02	RR-017, RR-055, RR-103, RR-124, RR-141, RR-146, RR-291, RR-317	Support for the Project on the basis that it would reduce abstraction from the Rivers Test and Itchen and protect chalk stream habitats.	The Applicant notes and welcomes these comments.
RR-POD-03	RR-124, RR-141, RR-146	Support for the Project on the basis that it would provide resilience against climate change, drought and population growth.	The Applicant notes and welcomes these comments.
RR-POD-04	RR-009, RR-012, RR-048, RR-050, RR-068, RR-085, RR-098, RR-107, RR-123, RR-128, RR-156, RR-166, RR-176, RR-178, RR-188, RR-201, RR-203, RR-226, RR-240, RR-242, RR-281, RR-288, RR-292, RR-293, RR-294, RR-300, RR-346	Objection to the Project on general grounds of opposition to the principle of the development.	The principle of water recycling is well established and recognised in national policy, widely used around the world and supported by the Environment Agency. It is not for this Examination to consider the principle of the technology. The benefits of water recycling are recognised in the National Policy Statement for Water Resources Infrastructure (NPSWRI) (paragraphs 2.6.15 – 2.6.16), the Water Resources South East (WRSE) Final Regional Plan (which proposes the development of six water recycling schemes across the south-east region by 2035 and a further two by 2075) (paragraphs 1.26 – 1.27) and through the Applicant's Water Resource Management Plan 2019 (WRMP19) Annual Review and emerging Water Resource Management Plan 2024 (WRMP24). The NPSWRI is clear on the role of different infrastructure types – and that it is the water resources management process where questions regarding the choice of infrastructure are considered (para 2.6.1).
RR-POD-05	RR-009, RR-036, RR-059, RR-095, RR-113, RR-174, RR-184, RR-235, RR-243, RR-278, RR-288, RR-289, RR-292, RR-300, RR-305, RR-352	Objection to the Project on the grounds that recycling treated wastewater into the public drinking water supply is unsafe or poses unacceptable health risks.	Water recycling is a well-established and internationally proven technology, successfully implemented in countries such as the United States, Australia and Singapore. 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. In the UK, the Drinking Water Inspectorate (DWI) has confirmed that water recycling can be delivered safely, outlining the robust regulatory requirements that water companies must demonstrate before recycled water can be put into supply. Please refer to the letter from the DWI [PDA-038].

Reference	RR references	Summary of issue raised	The Applicant's response
			Please refer to RR-WRPR-04 for details for how the recycled water and, later, drinking water quality is regulated. Please also refer to RR-WRPR-03 for details of the efficacy of water recycling. All water supplied to customers, regardless of its source, will continue to meet the highest standards for safety, taste, and quality, as required by the DWI. The Applicant remains committed to transparency, rigorous monitoring, and full compliance with all relevant regulations throughout the development and operation of the Project.
RR-POD-06	RR-009, RR-059, RR-095, RR-235, RR-288, RR-326, RR-352	Objection to the Project on the grounds of environmental and ecological risks, including from persistent contaminants such as PFAS.	As stated in section 19.8 of ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1), the Applicant has undertaken an extensive programme of monitoring of a wide range of Contaminants of Emerging Concern (CECs) in the final treated wastewater from Budds Farm Wastewater Treatment Works (WTW) (e.g. a representation of influent water quality to the Water Recycling Plant (WRP)) and water treated in its pilot treatment plant at Budds Farm WTW. This considered a wide range of substances, including: • Pharmaceuticals and personal care products (PPCPs): Organic contaminants sourced from pharmaceutical products and their metabolites, cosmetics, soaps and shampoos, which can be found in trace levels in wastewater. • Industrial chemicals: Substances such as per- and poly-fluoroalkyl substances (PFAS), polycyclic aromatic hydrocarbons (PAHs), volatile organic compounds (VOCs) and inorganic contaminants (including some trace metals). Although some specific compounds within these broad categories of chemicals have an established Environmental Quality Standard (EQS) (including some metals, PAHs and several PFAS compounds, this is not the case for the majority of these substances. • Agricultural chemicals: Substances such as pesticides and fertilizers that can be found in surface water runoff. The pilot plant included a Full Advanced Treatment (FAT) process, comprising integrated membranes followed by an ultraviolet and advanced oxidation process. Although this does not include the Granular Activated Carbon (GAC) and remineralisation processes that will be present within the Applicant's WRP, the pilot plant included the multi-barrier treatment process that will be primarily responsible for the effective removal of contaminants from the treated wastewater. As some contaminants would also be removed by the GAC process, the results from the pilot plant therefore represent an underestimate of the performance of the full WRP and are therefore considered to be the worst case. The results of the pilot plant investigation are described in an independent review produced by the University of Brighton (Mayor-Smith (2024) [1]), as referenced in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1). The results of the investigation into pilot plant

Reference	RR references	Summary of issue raised	The Applicant's response
			performance indicate that the FAT process resulted in a considerable increase in water quality, with the concentration of CECs decreasing after passing through the pilot plant. Over 60% of the CECs measured in the WRP influent decreased to below the limits of detection in the water that had passed through the WRP, with the largest reductions identified for a range of pharmaceuticals, personal care products and pesticides. The results of the pilot study clearly demonstrate that CEC concentrations in the recycled water are considerably lower than those in the treated wastewater from Budds Farm WTW that is currently released under a permitted discharge into the Solent via Eastney Long Sea Outfall (LSO). This suggests that releases from the WRP into Havant Thicket Reservoir and downstream water bodies (Riders Lane Stream, Hermitage Stream, Langstone Harbour) are unlikely to contain the full suite of CECs measured by the Applicant or independently recorded in Langstone Harbour [2] [3] and that any CECs remaining in the WRP output would be present in extremely low concentrations. Significant adverse effects on water quality and biota from CECs are considered unlikely, particularly given that the pilot plant data does not represent the full treatment process that would be in place at the WRP (which would also include a GAC treatment stage that would also remove contaminants from the recycled water).
RR-POD-07	RR-024, RR-065, RR-066, RR-113, RR-163, RR-191, RR-211, RR-235, RR-266, RR-301, RR-354	Objection to the Project on the grounds that it represents a material change of use or scope from the originally consented Havant Thicket Reservoir.	Havant Thicket Reservoir is a separate project which is being delivered by Portsmouth Water under a separate and already-approved planning permission. The initial Havant Thicket Reservoir proposal, which was approved by Havant Borough Council (HBC) and East Hampshire District Council (EHDC), was for a spring-fed reservoir to enable the supply of water to the Applicant in times of drought. The Project seeks to make the best use of Havant Thicket Reservoir by using recycled water to augment the quantity of water resources available. The Development Consent Order application submitted by the Applicant seeks to change the use of Havant Thicket Reservoir to allow the storage of recycled water. The Applicant held consultations on the Project in 2022, 2024, 2025, and 2026 setting out the intention to use Havant Thicket Reservoir to store recycled water.
RR-POD-08	RR-050, RR-081, RR-166, RR-185, RR-235, RR-268, RR-288, RR-298, RR-300	Objection to the Project on the grounds of a lack of trust and confidence in the Applicant to deliver and operate the Project safely and responsibly.	The Applicant recognises that public trust is a key issue, and rebuilding confidence is a priority. The Applicant has completed an ambitious plan to address operational performance. The Applicant's Turnaround Plan rapidly improved its performance between 2023 and 2025, with a renewed focus on ensuring a reliable water supply, protecting and improving the health of rivers and seas, enhancing customer service and becoming an industry leader in health and safety. The delivery of large and complex Strategic Resource Options such as this Project is managed through the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process, which provides independent, multi-stage scrutiny and assurance. This process ensures that all technical, environmental, and operational aspects are robustly assessed and

Reference	RR references	Summary of issue raised	The Applicant's response
			that stakeholder feedback is considered at each stage before progressing to the next phase. To date, the Applicant has passed the requirements of each stage of the RAPID gated process. Operation of the Project would be subject to stringent regulatory requirements set by the DWI, including independent sampling and oversight. All water supplied to customers would continue to meet the highest standards for safety and quality, and the Applicant is committed to full compliance with DWI regulations and to maintaining transparency throughout the development and operation of the Project.
RR-POD-09	RR-053, RR-134, RR-145, RR-157, RR-192, RR-218, RR-266	Objection to the Project on the grounds of concerns raised by Portsmouth Water customers regarding the transfer of their supply arrangements to the Applicant.	Nothing in the draft DCO [APP-023] alters the water undertaker from which customers receive their water supply. The supply area of each water undertaker is set out through the appointment of each water undertaker by Ofwat, and this is not affected by the Project. Please refer to RR-PWP-02 for more information. For further information about how the change of water source has been and will be communicated to customers, please refer to Appendix B in 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).
RR-POD-10	RR-068, RR-095, RR-156, RR-330	Objection to the Project on the grounds that it would set an inappropriate precedent and undermine local decision-making through the DCO process.	The Secretary of State gave a section 35 direction to pursue the Project under the DCO regime to better manage the efficient consenting of a complex project which stretches across seven host authorities. The Secretary of State will decide whether to grant consent for the Project, following Examination and a recommendation by the Examining Authority (ExA) (appointed by the Planning Inspectorate). The role of the ExA is to review the DCO application independently and recommend to the Secretary of State whether development consent should be granted. Host authorities, as statutory consultees, have played a key role in the process of developing the Project and are proposed to play a further key role in the consenting of detailed design matters. The Applicant has engaged early, regularly and extensively with host authorities affected by the Project, and South Downs National Park Authority (SDNPA) and local priorities and policy are understood and reflected in the Project design as far as reasonably practicable. The Statement of Engagement [APP-072] sets out the engagement undertaken with host authorities and SDNPA to date.
RR-POD-11	RR-184, RR-206, RR-234, RR-288, RR-354	Objection to the Project on the grounds that development consent is premature and should not be granted until the evidence base and safety case are complete and independently verified.	The Project is proceeding under the conventional timescales set out in the Planning Act 2008. The DCO process is required due to the nature and scale of the Project and its designation as a project of national significance. The Applicant has undertaken detailed investigations, assessments and surveys to develop the DCO application, as is required by policy and legislation. The Applicant is expediting delivery timescales wherever possible in order to enable the regulatory delivery date of 2034 to be met, as set out in the Applicant's emerging WRMP24. The Applicant has developed and improved

Reference	RR references	Summary of issue raised	The Applicant's response
			the proposals in readiness for the DCO application over a period of time that is typically considered longer than other projects following the DCO process owing to the number of consultations undertaken to support the Project's iterative development and improvement. The output from the water recycling plant will be subject to an environmental permit, issued by the Environment Agency. The Environment Agency, as expert regulator, will determine the parameters for the discharge that will be secured in the environmental permit to ensure that there are no unacceptable impacts to the environment. In accordance with paragraph 3.8.3 of the National Policy Statement for Water Resources Infrastructure, the DCO does not seek to duplicate this regulatory regime. The Environment Agency is the regulatory body responsible for the control of any discharge of potentially polluting substances into the environment. The water quality of the output from the water recycling plant will be controlled by and managed in accordance with the environmental permit. It is not the role of the DCO to speculate about how such substances will be regulated in the future. The Applicant will comply with the conditions of the environmental permit, ensuring that the recycled water does not cause harm to the environment. For further information about the relationship between the DCO and the applicable regulatory regimes, please refer to Appendix D and 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).
RR-POD-12	RR-130, RR-147, RR-242, RR-298, RR-352, RR-354	Objection to the Project on the grounds that more sustainable, cost-effective or best-value alternatives (including fixing leaks) have not been adequately pursued.	The Applicant has committed to halving leakage by 2050, supported by targeted mains replacement and advanced detection technologies. Leakage and demand reduction measures remain a key part of the strategy to address Hampshire's water supply deficit, but these can only be part of the overall solution, which also requires a large new water resource to maintain supplies into the future. Other options considered through both the Water Resources Management Plan (WRMP) and options appraisal processes do not provide the scale of new water resource needed and in the timescales required. The Scheme Development Report [APP-073] sets out the process the Applicant has taken to select the Project and explains how the Project is the only option available to deliver the scale of water resource required in the timescales needed.
RR-POD-13	RR-009, RR-124, RR-235, RR-326, RR-331	Objection to the Project on the grounds of unsustainable energy demand and delivery or engineering risks.	Operational energy consumption of the Project has been quantified within the Project's whole-life carbon assessment and identified in section 4.2 of the Outline Carbon Management Plan (CMP) [APP-423]. Over the 100-year whole-life appraisal, energy is estimated to represent a relatively small portion of the Project's whole-life operational carbon (2.2%). To manage carbon emissions, the Applicant has prepared the Outline CMP [APP-423], which establishes the strategic objective of reducing greenhouse

Reference	RR references	Summary of issue raised	The Applicant's response
			gas emissions to as low as reasonably practicable (ALARP). The strategic carbon objective and defined ALARP assessment criteria, also set out in the same document, are secured under the Development Consent Order (DCO) to ensure that opportunities to reduce carbon emissions continue to be identified, evaluated and implemented as the Project progresses through detailed design, construction and operation. This will require the Contractor to actively investigate carbon reduction opportunities and assess identified mitigation measures against the criteria set out in the Outline CMP [APP-423] to determine whether they are reasonably practicable and feasible to implement. Measures that satisfy these criteria will be implemented to reduce carbon emissions to ALARP. With regard to engineering risks, the Project meets safety, functional, maintenance and access requirements, and complies with all relevant policy and legislative requirements. Where such requirements, including those set out under the Security and Emergency Measures Direction (Water and Sewerage Undertakers and Water Supply Licensees) (Amendment and Revocation) Direction 2024 (SEMD), have influenced Project design outcomes (for example, fencing or access arrangements), this is reported and justified in the Scheme Development Report [APP-073].
RR-POD-14	RR-018, RR-076, RR-094, RR-128, RR-130, RR-159, RR-192, RR-196, RR-251, RR-293, RR-294, RR-354, AS-030	Statements of alignment with, or endorsement of, objections raised by parish councils, community groups and other representative bodies.	The Applicant has noted these comments and has provided responses to all relevant representations including those made by parish councils, community groups and other representative bodies.
RR-POD-15	RR-354	Comments on the scrutiny of claimed Project benefits relative to existing consents.	The Applicant is proposing a range of local benefits to be delivered as part of the Project, including voluntary Biodiversity Net Gain provision, environmental enhancements, and skills and employment measures. Many of the benefits proposed have been informed by consultation feedback, engagement with key stakeholders and through assessment outcomes. These benefits would be delivered in a variety of ways, such as through specific obligations, design principles or detailed designs. Section 5 of the Case for the Project (Document reference 5.6, DCO Volume 5, Version 1) sets out the proposed benefits and how these would be secured. The benefits claimed are additional to any other benefits claimed by other projects, such as Havant Thicket Reservoir.
RR-POD-16	RR-140, RR-250	Statements that the Project's local impacts warrant scrutiny but do not, in themselves, represent insurmountable objections to the principle.	The Applicant has noted these comments. The examination process provides further opportunity for independent scrutiny of the Project and its supporting environmental assessments.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-POD-17	RR-069	Comment that the principal components comprise new underground water transfer pipelines, a WRP and associated pumping stations, and break-pressure tanks.	The Applicant has noted these comments.

Table 2-28 Summary of issues raised on the theme of Project finance and cost and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-PFC-01	RR-020, RR-026, RR-076, RR-081, RR-106, RR-107, RR-166, RR-176, RR-178, RR-217, RR-242, RR-271, RR-281, RR-300, RR-321, RR-354	Concerns over the high overall capital cost of the Project (reported at £1.1–1.2 billion) and its continued escalation from the original scheme estimate.	Securing long term resilience whilst ensuring value for money for customers is achieved through the statutory water resources management plan process. For Development Consent Order applications, applicants are required, under paragraph 2.5.20 of the National Policy Statement for Water Resources Infrastructure (NPSWRI), to explain "*how the proposed infrastructure delivers value for money by reference to the analysis in the water resources management plan*". This is duly provided in chapter 3 of the Case for the Project (Document reference 5.6, DCO Volume 5, Version 1). Any solution to deliver a new source of water at the scale required will have relatively high capital and operational costs compared to current abstractions direct from the environment, and will likely involve water transfers, reservoirs, recycling or desalination. In 2025/26, the Applicant reviewed the options appraisal process it carried out in 2021 to test whether any changes in factors used as part of the various assessments might lead to a change in the preferred solution. The review demonstrated that despite increased costs, the Project remains the best value solution.
RR-PFC-02	RR-020, RR-076, RR-081, RR-107, RR-128, RR-129, RR-157, RR-166, RR-176, RR-217, RR-242, RR-271, RR-281, RR-300, RR-321, RR-354	Concerns that Project costs will be passed on to customers through increased water bills over the long term.	The mechanism for funding the Project is set out within the Funding Statement (Document reference 4.2, DCO Volume 4, Version 1). As noted at paragraph 3.1.1 of the Funding Statement [APP-026], the Applicant's core source of revenue is derived from customer bills, through the water regulatory framework for English water undertakers. As with all of the Applicant's costs, funding for new water supply infrastructure will be averaged across water supply customers' bills and will 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. The Applicant is investing record amounts to improve its performance for customers and the environment and has ambitious investment plans for the future, but ultimately the regulator will determine how much future bills can increase by to pay for this investment.
RR-PFC-03	RR-076, RR-081, RR-128, RR-129, RR-210, RR-242, RR-271, RR-281, RR-300, RR-354	Concerns over the high ongoing operational, maintenance and energy costs of the Project, including 24/7 pumping and reverse osmosis treatment.	The Project's carbon effects have been assessed in Environmental Statement (ES) Chapter 10 Carbon and climate change [APP-089]. The assessment considers whole life greenhouse gas emissions associated with construction, operation, asset replacement and decommissioning. Measures to reduce emissions during the operation of the Project design are set out in the Outline

Reference	RR references	Summary of issue raised	The Applicant's response
			Carbon Management Plan [APP-423] and Operational Environmental Management Plan [APP-422]. Having regard to the scale of emissions, their contribution relative to national carbon budgets, and the carbon reduction measures incorporated into the Project, the Applicant concludes that the Project's operational carbon effects are not significant in Environmental Impact Assessment terms.
RR-PFC-04	RR-354	Concerns over the very large operational energy demand of the Project and the high energy cost falling on customers for approximately 60 years.	Please refer to the Applicant's response to RR-PFC-03.
RR-PFC-05	RR-018, RR-106, RR-147, RR-168, RR-206, RR-234, RR-354	Concerns over a lack of transparency and public information on how the Project will be funded, including full whole-life costs and financing arrangements.	The mechanism for funding the Project is set out within the Funding Statement (Document reference 4.2, DCO Volume 4, Version 1). The Applicant has always been clear that funding for new investment in water supply infrastructure will need to be recovered, as it currently is, through water supply customers' bills over the long-term. Please also refer to RR-PFC-02 in relation to the role of Ofwat in protecting the consumer.
RR-PFC-06	RR-166, RR-206, RR-354	Suggestions that independent financial scrutiny, audit and transparent public reporting should be maintained throughout the Project's life.	This is not considered a matter relevant to the determination of the Development Consent Order application. As with all of the Applicant's costs, funding for new water supply infrastructure will be averaged across water supply customers' bills and will 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-PFC-07	RR-018, RR-076, RR-166, RR-206, RR-242, RR-331, RR-354	Concerns over the risk of construction cost overruns and the transfer of financial risk to bill payers.	The mechanism for funding the Project is set out within the Funding Statement (Document reference 4.2, DCO Volume 4, Version 1). The cost of the Project will continue to evolve as the project progresses through the consenting, procurement and delivery phases. The cost of this investment to customers is controlled by the water industry regulator, Ofwat, which exists to protect the consumer and ensure water companies deliver value for money.
RR-PFC-08	RR-071, RR-082, RR-159, RR-206, RR-223, RR-281, RR-346, RR-354	Concerns that the Project does not represent best value for money compared with alternative solutions available.	The Project has been identified through the Applicant's Water Resources Management Plan (WRMP) and options appraisal processes as a crucial part of its strategy to respond to current and future water supply challenges in its Hampshire supply area both in drought and normal conditions. Project costs, carbon emissions, environmental impacts and delivering best value for customers have been key factors in the Applicant's assessment and consideration of alternative solutions. Other solutions have been extensively considered but are not available at the scale needed and, in the timescales, required. The Scheme Development Report [APP-073, APP-074, APP-075] explains the process that the Applicant has undertaken to select and develop the Project. The Funding Statement (Document reference 4.2, DCO Volume 4, Version 1) and section 3 of the Case for the Project (Document reference 5.6, DCO

Reference	RR references	Summary of issue raised	The Applicant's response
			Volume 5, Version 1) contain a 'Value for Money' statement. The Case for the Project (Document reference 5.6, DCO Volume 5, Version 1) outlines how best value is a golden thread running through the WRMP process.
RR-PFC-09	RR-354	Concerns that the best value assessment relies on out-of-date 2021 CAPEX and OPEX cost information that no longer reflects the £1.2 billion price tag.	In 2025/26, the Applicant reviewed the options appraisal process it carried out in 2021 to test whether any changes in factors used as part of the various assessments might lead to a change in the preferred solution. The review demonstrated that despite increased costs, the Project remains the best value solution.
RR-PFC-10	RR-354	Concerns that certain costs have not been included in the assessment, including additional treatment at Farlington WTW, sewer catchment risk reduction, and reject water mitigation.	This is not considered a matter relevant to the determination of the DCO application. Notwithstanding that: • Any mitigations required to address impacts of the Project will be included in the Project's capital and operational costs as appropriate. • Any works to Portsmouth Water's assets required to facilitate the Project will be captured within the costs for the reservoir, which the Applicant is funding. • Reject water will be released through the Applicant's existing long sea outfall and our Environmental Assessment has not predicted any impacts that require mitigation.
RR-PFC-11	RR-354	Concerns that no cost allowance has been included to reduce risks in the sewer catchment or address variability in the final effluent stream from Budds Farm WWTW.	This is not considered a matter relevant to the determination of the DCO application. Nonetheless, the Applicant has assessed the Project based on the information available and considers that the indicative design, operational controls and mitigation measures incorporated into the Project are appropriate to manage the identified risks and support the delivery and operation of the Project. The environmental and technical assessments submitted as part of the DCO application have considered relevant operational and environmental considerations, including a robust approach to different influent streams and the management of treated effluent streams. Cost and risk allowances have been made at this stage of design development and will continue to be developed in subsequent design stages.
RR-PFC-12	RR-354	Concerns over the cost, difficulty and financial risk of developing infrastructure on the former Broadmarsh landfill site, including likely operational cost escalation.	Cost and risk allowances have been made at this stage of design development and will continue to be developed in subsequent design stages. The likely challenges and risks of carrying out construction works at the former landfill site have been factored into the capital cost estimates for the Project.
RR-PFC-13	RR-354	Concerns that the length and cost of tunnelling may have unduly influenced the options assessment outcome, and that the cost review was too high-level.	Costs would have been estimated at the relevant stage of design development to inform the options appraisal process. In 2025/26, the Applicant reviewed the options appraisal process it carried out in 2021 to test whether any changes in factors used as part of the various assessments might lead to a change in the

Reference	RR references	Summary of issue raised	The Applicant's response
			preferred solution. The review demonstrated that despite increased costs, the Project remains the best value solution.
RR-PFC-14	RR-168, RR-354	Concerns over the economic viability and scale of the effluent recycling methodology, including reliance on Ofwat determination assumptions requiring future capacity increases.	Capital and operational cost estimates for the Project have been provided in the Applicant's submissions to RAPID, which continues to support the development of the Project. The Project has been demonstrated through the Applicant's options appraisal and WRMP processes to be the best value solution. The Applicant's WRMP and options appraisal processes have determined the output and capacity of the Project required to meet existing and future need, and this has been supported by RAPID during the development of the Project.
RR-PFC-15	RR-210, RR-354	Concerns that the Project offers a poor long-term return on public asset value, with reverse osmosis assets requiring costly overhauls every 10–20 years and no lasting legacy beyond 60 years.	The Applicant acknowledges the respondent's concerns regarding the long-term value of the Project and the lifecycle replacement requirements associated with reverse osmosis equipment. The Water Recycling Plant (WRP) site has an overall design life of approximately 60 years with major infrastructure, such as buildings, tunnels, shafts and other civil structures, designed to provide long-term operational benefits, as set out in the ES Chapter 3 Description of the Proposed Development [APP-082]. As with all water treatment facilities, individual mechanical, electrical and process components have differing design lives and are routinely maintained, refurbished or replaced as part of normal asset management practices. Components such as reverse osmosis membranes and other treatment equipment are expected to be renewed periodically to maintain operational performance and to accommodate advances in technology. The system design readily facilitates membrane replacement, which would typically be undertaken on a rolling replacement programme. This does not affect the overall design life of the WRP site or the long-term benefits it will provide. The Project will deliver a resilient water resource for the region, with ongoing maintenance and equipment replacement ensuring continued operation throughout its design life.
RR-PFC-16	RR-354	Concerns over restrictions on Havant Thicket Reservoir supply flexibility, requiring Portsmouth Water to incur additional costs developing replacement sources that will fall on their customers.	Havant Thicket Reservoir is being developed to enable additional water supplies to be provided to the Applicant, which is why the Applicant is fully funding the reservoir over the long-term. The Project will enhance the use of the reservoir by significantly increasing its deployable output to further directly address the Applicant's water supply deficit. The draft DCO [APP-023] ensures the water within the reservoir is safeguarded to meet the supply need for the Applicant's customers. Up to 25Ml/d is allocated to Portsmouth Water to meet an agreed supply transfer to the Applicant under an existing Bulk Supply Agreement (BSA1), with up to 90Ml/d available to the Applicant directly and an overall cap of 115Ml/d for the Applicant's supply needs.

Reference	RR references	Summary of issue raised	The Applicant's response
			As confirmed in the joint statement between the Applicant and Portsmouth Water, neither the existing agreement, nor the second bulk supply agreement currently being negotiated make provision, and need not make such provision, for any potential future water supply need for Portsmouth Water. The reservoir is being funded solely by Southern Water and Southern Water customers to provide water for Southern Water customers; it is not being built or funded for any purpose other than this primary use of supplying water to Southern Water customers. Any additional supply for Portsmouth Water customers does not form part of the Project and is not provided for within the DCO.
RR-PFC-17	RR-076, RR-168, RR-264, RR-281, RR-300, RR-330, RR-354	Concerns that the Project is driven by profit and shareholder dividends rather than by customer service or best value.	The principal driver for this Project is to meet the Applicant's duty to supply water whilst protecting the environment by reducing over abstraction from Hampshire's precious chalk streams. As a regulated industry, the amount of return that the Applicant can make on its investment is controlled by Ofwat. Ofwat exists to protect the consumer and ensure water companies deliver value for money by controlling costs that water companies can charge customers. Please also refer to RR-PFC-02.
RR-PFC-18	RR-018, RR-168, RR-242	Concerns over the Project's ownership, financing and delivery structure, including the Direct Procurement for Customers model and non-recourse project finance arrangements.	The mechanism for funding the Project is set out within the Funding Statement (Document reference 4.2, DCO Volume 4, Version 1). The Direct Procurement for Customers (DPC) procurement model is designed to deliver better value for customers by competitively tendering the design, construction and operation of the Project. Please also refer to RR-PFC-02 for further information as to Ofwat's role in protecting the consumer.
RR-PFC-19	RR-300, RR-354	Concerns over the affordability impact on customers in the context of the cost-of-living crisis and vulnerable households.	The Applicant recognises concerns regarding affordability, particularly in the context of the cost-of-living crisis and vulnerable households. Capital and operational cost estimates for the Project have been provided through the RAPID gated process and will continue to be scrutinised through future regulatory submissions. The cost of the Project will continue to evolve as the Project progresses through the consenting, procurement and delivery phases. The cost of this investment to customers is regulated by Ofwat, whose role includes protecting customers and ensuring that water companies deliver value for money. Future customer bill impacts will ultimately be determined through the regulatory process. The Project was selected as the best value solution through the Applicant's Water Resources Management Plan and options appraisal processes, which considered affordability alongside environmental, resilience and customer factors. No alternative solution was identified that could provide the scale of water required within the timescales needed to address the forecast water supply deficit. The Applicant also recognises that affordability concerns can have greater implications for some groups within society. The ES Chapter 17 Socio-economics, Tourism and Health (Document reference 6.1, DCO Volume 6,

Reference	RR references	Summary of issue raised	The Applicant's response
			Version 1) identifies that people living in deprived areas and other vulnerable groups may be more sensitive to changes affecting wellbeing and quality of life. However, the same assessment concludes that the Project would provide significant long-term benefits through improved water security and resilience for customers and communities.
RR-PFC-20	RR-354	Concerns that the £500,000 financial contribution offered is inadequate compared with the estimated £15 million cost of reinforcing coastal defences at Broadmarsh, and that funding for biodiversity and PRoW enhancements should be additional rather than substitutive.	The proposed Broadmarsh Coastal Park Improvement Fund is not for coastal defences. The Project will not have any impact on coastal processes and a contribution to coastal defences would not be reasonably related to the Project. The proposed contribution responds to policy BD11 of Havant Borough Council's development plan (which relates to the allocation of the WRP site). The policy contains a number of 'site opportunities' including opportunities to "enhance the habitat of Broadmarsh Coastal Park and/or the surrounding area", indicating these improvements are a key local priority. The proposed benefits packages for the Project are explained in section 4.1 of the Case for the Project (Document reference 5.6, DCO Volume 5, Version 1). Precise details of the allocation of funding will be determined between the Applicant and Havant Borough Council but it is likely to include elements such as surface and pathway improvements, including Public Rights of Way (PRoW) along waterways where appropriate, improved lighting, new benches and enhanced planting and landscaping. This position has been agreed between the Applicant and Havant Borough Council as reflected in the draft Statement of Common Ground (Document reference 5.8, DCO Volume 5, Version 1).
RR-PFC-21	RR-110	Concerns that the cost and disruption of the pipeline from the River Test has not been fully costed.	The Project does not include a pipeline from the River Test. A description of the Project is set out in ES Chapter 3 Description of the Proposed Development [APP-082]. Capital and operational cost estimates for the Project have been provided in the Applicant's submissions to the RAPID as part of the regulatory process, which continues to support the development of the Project. A further and final submission was made to RAPID shortly after the DCO application was submitted. Cost and risk allowances have been made at each stage of design development to inform regulatory submissions and will continue to be developed as the project progresses through the consenting, procurement and delivery phases. The construction and operation of the Project would be competitively tendered to ensure best value can continue be derived through the delivery phase of the Project.
RR-PFC-22	RR-266, RR-354, AS-030	Concerns that the mitigation costs for developing on the Broadmarsh landfill have not been included in the current scheme costs and will be substantial.	Please refer to the Applicant's response to RR-PFC-12. The requirements for developing on this land have been fully considered, including the associated costs.
RR-PFC-23	RR-266	Request that the value and benefits of the existing Havant Thicket Reservoir are separately identified from the additional benefits claimed for the Project.	The benefits of Havant Thicket Reservoir have been identified through the original planning application. Notwithstanding the environmental and

Reference	RR references	Summary of issue raised	The Applicant's response
			community benefits claimed for the reservoir, its principal purpose is to enable additional water supplies to be provided to the Applicant. The Project significantly enhances the benefit of Havant Thicket Reservoir by greatly increasing its deployable output in the interests of further maintaining the Applicant's customer water supplies and reducing abstractions on the Rivers Test and Itchen. Whilst Havant Thicket Reservoir is proposed to form a fundamental part of the Project, the benefits claimed for the Project are additional.
RR-PFC-24	RR-266	Concerns over the apportionment of Project costs and risks attributable to the Applicant's water resource needs, and the protection afforded to Portsmouth Water customers.	The principal purpose of the Project is to maintain the Applicant's customer water supplies whilst reducing abstractions from the Rivers Test and Itchen. The Applicant is fully funding both the reservoir and the Project over the long-term in recognition of the Applicant's water resource need that both projects are designed to address.
RR-PFC-25	AS-030	Concerns over the absence of year-by-year replacement and maintenance costs covering the Project's 100-year design life, needed to understand whole-life service delivery costs and compare with alternatives.	The Funding Statement (Document reference 4.2, DCO Volume 4, Version 1), and the Case for the Project (Document reference 5.6, DCO Volume 5, Version 1) contain a 'Value for Money' statement. The Case for the Project (Document reference 5.6, DCO Volume 5, Version 1) outlines how best value is a golden thread running through the Water Resources Management Plan process and the options appraisal process undertaken to select the Project, which remains the best value solution to addressing the need identified. It would not be appropriate or propionate to provide a year by year break down of costs, due to the uncertainty of when components may need maintenance or replacement.

Table 2-29 Summary of issues raised on the theme of Project timescales and programme and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-TPP-01	RR-193	A suggestion that the exact period for which grazing land will be unavailable should be confirmed.	The Project would be constructed over approximately a five-year period and will be phased. A detailed construction programme has not been defined at this stage as it will be developed by the Contractor once appointed. Graphic 3-2 of the Environmental Statement (ES) Chapter 3 Description of the Proposed Development [APP-082] sets out the outline construction programme, which has informed the environmental assessments. Based on the indicative design and initial assessment, Pipeline construction will be delivered in sections. The maximum construction period for one of these sections will be approximately six months, with the potential of some enabling works prior to this. Section B.2.13 of the Outline Construction Environmental Management Plan (CEMP) (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) details the role of the Agricultural Liaison Officer (ALO) who acts as a liaison between the landowners and the Contractor. This includes undertaking pre-construction liaison with landowners, occupiers and their agents to reduce

Reference	RR references	Summary of issue raised	The Applicant's response
			disruption, where practicable, to existing farming regimes and timings of activities.
RR-TPP-02	RR-354	Concern that the delivery timescales for the Project are unrealistic given complexity, consenting requirements, public opposition, novel technology and development on landfill sites, with a likelihood of delays beyond programmed dates leaving no realistic Plan B for chalk river protection.	The Applicant is making every effort to deliver the Project at the earliest opportunity in order to support the ecological and environmental objectives that reduced abstractions are required to achieve. Prior to construction starting, timescales are largely dictated by the requirements of the planning process and the need to undertake environmental and technical surveys and investigations, consultation and engagement and development of the Project. The Project would be constructed over approximately a five-year period and will be phased. A detailed construction programme will be developed by the Contractor once appointed. Graphic 3-2 of the ES Chapter 3 Description of the Proposed Development [APP-082] sets out the outline construction programme, which has informed the environmental assessments, while 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) sets out that the Pipeline will be constructed in sections. The maximum construction period of one of these sections will be approximately six months, with the potential of some enabling works prior to this.
RR-TPP-03	RR-287	A comment that the Project should take around five years to complete.	The Applicant has noted this comment. 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. Graphic 3-2 of the ES Chapter 3 Description of Proposed Development [APP-082] sets out the outline construction programme, which has informed the environmental assessments.
RR-TPP-04	RR-354	A suggestion that alternative schemes rejected on the basis they could not be delivered by 2035 should be revisited, given that the selected effluent recycling scheme also cannot be delivered until 2035 and is likely to slip further.	The Applicant is making every effort to deliver the Project at the earliest opportunity in order to support the ecological and environmental objectives that reduced abstractions are required to achieve. Prior to construction starting, timescales are largely dictated by the requirements of the planning process and the need to undertake environmental and technical surveys and investigations, consultation and engagement and development of the Project. The Project has been identified through the Applicant's Water Resources Management Plan (WRMP) and options appraisal processes as a crucial part of its strategy to respond to current and future water supply challenges in its Hampshire supply area both in drought and normal conditions. Project costs, carbon emissions, environmental impacts and delivering best value for customers have been key factors in the Applicant's assessment and consideration of alternative solutions. Other solutions have been extensively considered but are not available at the scale needed and in the timescales required. Further information on the need for the Project is provided in the Case for the Project (Document reference 5.6, DCO Volume 5, Version 1).

Reference	RR references	Summary of issue raised	The Applicant's response
RR-TPP-05	RR-331	Concern that construction costs and timelines have been fundamentally underestimated.	The Project was selected as the preferred solution 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 in its Hampshire supply area, in both drought and normal conditions. The options appraisal process, which has recently been updated to reflect Project changes since it was first undertaken in 2021, considered a number of alternative options against a range of criteria, including best value, and continues to select the Project as the preferred solution. Any solution to deliver a new source of water at the scale required will have relatively high capital and operational costs compared to current direct abstractions from the environment, and the solution chosen offers better value for money than the previous desalination proposal. No other solutions are available that can provide the scale of water needed within the timescales required. Further information about the options appraisal process is provided in the Scheme Development Report [APP-073 to APP-075 - 3 documents]. The Project would be constructed over approximately a five-year period. A detailed construction programme will be developed by the Contractor once appointed. Graphic 3-2 of the ES Chapter 3 Description of the Proposed Development [APP-082] sets out the outline construction programme, which has informed the environmental assessments but will be adapted by the Contractor in detailed design.

Table 2-30 Summary of issues raised on the theme of resources and waste management and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-RWM-01	RR-354	Suggestion that the Applicant confirm the destination, disposal route and environmental impact of every residual waste stream from the treatment process, including filtration and membrane residuals and chemical cleaning waste, and whether any are returned to Budds Farm WTW.	The Environmental Statement (ES) Appendix 5.1 EIA Scoping Report [APP-104] proposed to scope out an assessment of wastes generated during operation, on the basis that the quantity of wastes expected to be generated during operation would be negligible in relation to the regional generation of industrial and commercial waste. The Planning Inspectorate stated in their scoping opinion, that: "*Having regard to the nature and characteristics of the operational Proposed Development, the Inspectorate is content with this approach. Impacts from waste generated during operation can be scoped out of assessments in the Resource and Waste Management ES Chapter*." The management of wastes generated during the operational phase of the development are therefore not assessed in the ES. Notwithstanding the above, details of the quantities and management of waste expected to be generated during operation are set out in paragraphs 3.6.39 and 3.6.40 of the ES Chapter 3 Description of the Proposed Development [APP-082], including the following: "*3.6.39 Operation of the Proposed Development would result in the production of waste…*

Reference	RR references	Summary of issue raised	The Applicant's response
			Chemical filter washing at the WRP site would generate up to approximately 163m^3 of waste per day which would be discharged via the foul sewer network to Budds Farm WTW. This discharge will be undertaken in line with a trade effluent permit." The Water Recycling Plant also produces a reject stream. This reject stream is discharged to sea through the Eastney Long Sea Outfall. Both the recycled water and the reject stream will be controlled by an environmental permit. The process is explained in more detail in RR-WRPR-04.

Table 2-31 Summary of issues raised on the theme of socio-economic, tourism and health and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-STH-01	RR-354	Concerns over impacts on community receptors located along the pipeline route, including: • Two schools (including a large secondary school used as a community hub) • The area medical centre and the services it provides • The local shopping centre, pharmacy and petrol station.	Concerns have been raised regarding potential impacts on community receptors in the Leigh Park and Bedhampton area, particularly along Park Lane and Middle Park Way. These receptors include two schools (one of which is described as a large secondary school and community hub), the local medical centre, and local retail facilities including a shopping centre, pharmacy and petrol station. Potential effects on community and commercial receptors have been assessed in Environmental Statement (ES) Chapter 12 Land use and agriculture [APP-091]. As set out in ES Chapter 12 Land use and agriculture [APP-091], community and land facilities include doctor's surgeries, schools, hospitals, sports facilities and places of worship. The commercial property assessment covers industrial businesses, rural business parks, leisure centres and utilities and commercial land such as commercial forestry used for timber production, sports grounds, roads, railways, waterways, and allotments. The local shopping centre, pharmacy and petrol station would be considered as commercial property and land within ES Chapter 12 Land use and agriculture [APP-091]. The assessment covers community and commercial receptors within the Order Limits plus a 500m buffer and considers direct and indirect effects on these receptors, including temporary loss of access and boundary features and temporary in-combination effects on amenity, informed by the air quality, noise and vibration, and traffic and transport assessments. No significant effects in ES Chapter 12 Land use and agriculture [APP-091] have been reported for receptors that are defined as; schools, medical or health centres, shopping centre, pharmacies or petrol stations. The Applicant notes that the Relevant Representation does not identify the specific schools, medical centre or retail facilities referred to and is therefore unable to confirm the exact receptors concerned. However, the community facilities identified in the representation appear to be associated with the previously assessed Corridor Section O, as shown on ES Figure 4.1 Pipeline Corridor Sections Assessed at Stage 3 [APP-212]. The Applicant clarifies this route has not been selected as part of the Project.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-STH-02	RR-226, RR-282	Concerns over the loss of the livery yard as a valued community asset supporting social interaction, recreation, physical health and mental wellbeing.	The Applicant acknowledges the concerns raised over the loss of the livery yard as a valued community asset. Ash House Farm is identified in ES Chapter 12 Land use and agriculture [APP-091] as an equestrian/outdoor activities receptor in Waltham Chase. The Applicant recognises that equestrian facilities can provide recreational opportunities and support social interaction and wellbeing for their users. The Project will not result in the loss of Ash House Farm livery yard. This resource is included among the equestrian centres that could experience temporary and short-term impacts from construction activity. ES Chapter 12 Land use and agriculture [APP-091] assesses these receptors collectively as having low sensitivity and identifies a moderate magnitude of impact due to the potential temporary loss of land, impacts on access arising from traffic delays and a potential change in the operating environment. Overall, this results in a minor adverse effect, which is not significant. The Outline Construction Environmental 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) includes commitments that the Contractor will proactively engage with affected landowners, occupiers and operators, undertake engagement as early as reasonably practicable, minimise disruption where practicable, and facilitate discussions regarding timing, sequencing and alternative arrangements. Measures 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) are secured by the relevant requirement in Schedule 2 to the draft Development Consent Order (DCO) [APP-023].
RR-STH-03	RR-282	Concerns over the impact on quality of life from potential loss of the livery yard or displacement of horses.	The Project will not result in the loss of Ash House Farm livery yard. Ash House Farm is identified in ES Chapter 12 Land use and agriculture [APP-091] as an equestrian/outdoor activities receptor in Waltham Chase. The assessment identifies that construction could temporarily affect the operation of equestrian centres, including Ash House Farm, through temporary loss of land, impacts on access arising from traffic delays and a potential change in the operating environment. Access to businesses would be maintained at all times. The receptors are assessed as having low sensitivity and the magnitude of impact is assessed as moderate. Overall, this results in a minor adverse effect, which is not significant. The Applicant recognises that equestrian activities can contribute to recreation, physical activity and wellbeing for participants. The potential implications for quality of life are considered in ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1). This chapter applies the World Health Organization definition of health, encompassing physical, mental and social wellbeing, and defines wellbeing as including comfort, happiness and life satisfaction. The health assessment considers effects at a population level and includes access to green space, recreation and physical activity as determinants of health. It recognises that access to

Reference	RR references	Summary of issue raised	The Applicant's response
			green space contributes to good mental health and that access, safety and amenity can influence participation in physical activity. As the Project would not result in the loss of Ash House Farm livery yard, the potential health and wellbeing effects associated with the loss of this specific facility do not arise. ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1) considers the potential for construction activities to affect walkers, cyclists and equestrians through temporary disruption to Public Rights of Way, construction traffic and reduced amenity. Taking account of the wider network and temporary nature of the impacts, it identifies a short-term, minor adverse effect on health and wellbeing associated with reduced levels of active travel and physical activity, which would not be significant.

Table 2-32 Summary of issues raised on the theme of terrestrial and freshwater biodiversity and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-TFB-01	RR-006, RR-028, RR-040, RR-072, RR-107, RR-128, RR-130, RR-159, RR-182, RR-225, RR-230, RR-242, RR-282, RR-354	Concerns over the general adverse impacts of the Project on biodiversity, habitats and wildlife.	The Environmental Statement (ES) provides the impact assessment for the Project. The impact assessment for biodiversity is detailed within ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1). This considers ecological features such as designated sites, notable or protected species and sensitive habitats and confirms that, with mitigation, there will be no significant residual effects from the Project on ecological receptors. The Habitats Regulations Assessment - Stage 2 Appropriate Assessment and Marine Conservation Zone - Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2) for the Project presents the detailed assessment for internationally designated Habitats Sites and confirms that, with mitigation, there will be no adverse effects on the integrity of these sites.
RR-TFB-02	RR-006, RR-028, RR-128, RR-354	Concerns that environmental assessments of impacts on protected habitats, water bodies and the wider ecosystem have not been fully undertaken.	The Project has been subject to a complete assessment in regard to ecological impacts 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) which was carried out in line with all relevant assessment guidance. The assessment was based on data collected from a comprehensive programme of field surveys covering both habitats and protected species, all of which were undertaken following current relevant survey guidelines.
RR-TFB-03	RR-040, RR-226, RR-354	Concerns over the loss of ancient woodland and established wildlife habitats, including badger setts.	The Project has been designed to avoid all Ancient Woodland and embedded mitigation ensures a minimum of a 15m buffer from these irreplaceable habitats. The Environmental Mitigation and Enhancement Areas (EMEAs) are the only locations where the Order Limits are within 15m of Ancient Woodland;

Reference	RR references	Summary of issue raised	The Applicant's response
			this is to allow the creation of direct connectivity with these woodlands. No Ancient Woodland will be lost as a result of the Project. Similarly, the Project has incorporated avoidance of main or subsidiary badger setts where possible. Where this has not been possible, the Order Limits have allowed space for flexibility in the detailed design for micrositing of the route or appropriate mitigation, which will be informed by pre-construction badger surveys. These surveys will be undertaken at the detailed design stage to ensure appropriate mitigation and licensing requirements can be implemented. The pre-construction surveys are secured in the Outline Construction Environment Management Plan (CEMP) (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). The Applicant recognises that badgers are a mobile species and badger activity and sett distribution across the landscape is likely to change between the baseline surveys completed for the DCO submission and construction commencing. Pre-construction surveys will inform the engineering and mitigation design, following the mitigation hierarchy, with an aim to avoid badger setts, and where this is not possible appropriate mitigation such as artificial setts will be provided.
RR-TFB-04	RR-095, RR-122, RR-128, RR-129, RR-354	Concerns over ecological harm to the protected habitats of Langstone Harbour, including SAC, SPA, SSSI and Ramsar designated sites.	The Habitats Regulations Assessment - Stage 2 Appropriate Assessment and Marine Conservation Zone - Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2) and ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) assess the potential impact pathways arising from the Project that could affect the ecology of Chichester and Langstone Harbours SPA and Ramsar, Solent Maritime SAC and Langstone Harbour SSSI. These documents conclude no adverse effect on the integrity of these sites and no significant adverse effects will occur as a result of the Project.
RR-TFB-05	RR-122, RR-354, AS-034	Concerns that adverse potentially significant impacts on SAC and SPA birds from the Eastney Long Sea Outfall (LSO), including prey availability, disturbance and water quality, have not been adequately explained, mitigated or evidenced through monitoring.	Water quality modelling undertaken demonstrates that there would be insignificant differences between the existing discharge from the Eastney LSO and the proposed operational scenario. In addition, rapid dilution is predicted, with Environmental Quality Standards reached within 1m to 2m of the outfall. The Habitats Regulations Assessment - Stage 2 Appropriate Assessment and Marine Conservation Zone - Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2) and ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) assess the potential impact pathways arising from the Project that could affect SAC and SPA birds. These documents conclude no adverse effects will occur as a result of the Project.
RR-TFB-06	RR-107, RR-129, RR-354	Concerns over construction stage disturbance to, and loss of, Solent Waders and Brent Geese habitat (including functionally linked sites H08, H90 and W03G) and the adequacy of proposed mitigation and compensation.	Both 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) consider SWBGS sites, which are functionally linked habitat supporting

Reference	RR references	Summary of issue raised	The Applicant's response
			wintering bird populations that are qualifying features of the coastal SPA and Ramsar sites. The design of the Project has prioritised avoidance of impacts to designated sites and functionally linked land. Where this has not been practicable, mitigation is proposed to ensure that there is no adverse effect on the structure, function or integrity of internationally designated sites or associated functionally linked land during construction or operation. Mitigation measures proposed for SWBGS sites are secured within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3), specifically measure TFB023, and include the following three key elements: • The securing of the management of an existing but infrequently available SWBGS candidate site, ensuring its suitability and availability on a long-term basis. This habitat will be of a higher quality for SWBGS bird species than the habitats lost and will provide the function that is to be lost. • The use of disturbance minimisation measures, such as visual screening and acoustic barriers as well as 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 W03G. Monitoring of the SWBGS mitigation site will be extended beyond the construction period and includes triggers for remedial actions if required.
RR-TFB-07	RR-129, RR-225, RR-354	Concerns over the loss and fragmentation of wildlife corridors from removal of hedgerows and trees along the pipeline route, including impacts on bats, birds, invertebrates and mammals.	The Project has been designed to reduce impacts on wildlife corridors and habitat fragmentation where practicable. Mitigation measures include a reduced working width at hedgerow and watercourse crossings and implementation of measures such as temporary fencing to help maintain habitat connectivity to the wider landscape for protected species, including bats and dormouse, this is detailed in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). All temporarily impacted habitats will be reinstated. The reinstatement strategy is detailed in the Outline Landscape and Ecology Management Plan (LEMP) (Document reference 7.5, DCO Volume 7, Version 1).
RR-TFB-08	RR-354	Concerns over pathways for invasive species transfer between river catchments arising from pipeline bursts, maintenance flushing, or washout events, including risks to the River Itchen (SAC) and River Meon (Compensatory SAC).	The Applicant acknowledges the concern. The Project has been specifically designed to prevent the transfer of Invasive Non-Native Species (INNS) during normal operation and to minimise risk during abnormal circumstances. The operational controls for INNS management are secured through the INNS Biosecurity Plan [APP-425] and the Operational Environmental Management Plan [APP-422]. Under normal operation, operational releases associated with maintenance activities, including washout testing and routine washouts, will be managed through controlled disposal arrangements, including collection and removal by tanker, and will not be discharged to the environment. In the event of an emergency washout or pipeline failure, system isolation measures together with the Emergency Response Plan and Emergency INNS

Reference	RR references	Summary of issue raised	The Applicant's response
			Management Plan will be implemented to manage and mitigate the risk of INNS transfer between catchments
RR-TFB-09	RR-128, RR-161, RR-174, RR-177, RR-182, RR-230, RR-354	Concerns that contamination, leachate migration and discharges of recycled or reject water will adversely affect surrounding habitats and wildlife.	The Applicant appreciates concerns over leachate migration and discharges of recycled or reject water. ES Chapter 11 Land quality and ground conditions (Document reference 6.1, Volume 6, Version 1) provides an assessment of the potential for pre-existing contamination to be mobilised, or for new sources of contamination to be introduced as part of the construction, operation and decommissioning of the Project. This assessment includes the potential for migration and discharge of contamination into surface waters that could lead to a reduction in surface water quality and impact on the ecological habitats they support. This assessment concluded that there would be no significant adverse impacts on ecological receptors. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) secures various measures to protect controlled waters and ecologically sensitive sites, including adherence to risk assessments and method statements, placement of contaminated soil stockpiles on impermeable surfaces. Outline Foundation Works Risk Assessments (FWRA) have been prepared [APP-417 to APP-419 – 3 documents] which provide examples of foundation types that may be adopted. The commitment to undertake detailed FWRAs is secured within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). The Applicant has undertaken hydrodynamic dispersion modelling to assess the potential effects of releases of water from the reservoir on water quality in downstream water bodies, including the Riders Lane Stream and Hermitage Stream. The full assessment is presented within ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1). The results of the water quality modelling for Havant Thicket Reservoir presented in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1) indicate that a small (non-significant) improvement is predicted to occur in the Havant Thicket Reservoir following introduction of recycled water. The results of the compensatory flows water quality modelling (presented in ES Appendix 19.6 Havant Thicket Reservoir Compensatory Flows water quality modelling [APP-201]) indicate that compensatory flows from the reservoir would result in limited changes to water quality in downstream water bodies during the operational phase of the Project. ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) concludes that the addition of the reject water from the Project to the existing release from Eastney LSO would not result in any changes to water quality and would not extend into connected water bodies such as Langstone Harbour or the tidally influenced Hermitage Stream and therefore are not expected to adversely impact surrounding habitats and wildlife.

Reference	RR references	Summary of issue raised	The Applicant's response
			The above assessments conclude that no adverse effects on habitats and wildlife are anticipated. Further detail for the assessment on habitats and wildlife specifically are provided in ES Chapter 8 Terrestrial and Freshwater Biodiversity (Document reference 6.1, DCO Volume 6, Version 1).
RR-TFB-10	RR-156, RR-177, RR-300, RR-354	Concerns that keeping Havant Thicket Reservoir constantly topped up will reduce biodiversity and biodiversity net gain benefits compared with the original spring-fed reservoir proposal, particularly for wetland habitats and birds.	The Project involves the input of recycled water to Havant Thicket Reservoir to increase its deployable output as a public water supply. The wetland area along the northern margin of Havant Thicket Reservoir will be predominantly fed by the existing headwaters of Riders Lane Stream, rather than the reservoir itself. The modelling exercise contained within ES Appendix 19.6 Havant Thicket Reservoir Compensatory Flows water quality modelling [APP-201] also indicated that there will be limited movement of water from the main body of Havant Thicket Reservoir across the five control structures to the wetland. It is therefore considered that the Project will not impact the creation of the wetland environment. Due to the lack of connectivity between the wetland habitats and Havant Thicket Reservoir, it is considered that biodiversity, Biodiversity Net Gain benefits and the protected species the habitat may support will not be adversely affected by the Project.
RR-TFB-11	RR-354	Concerns over the loss of a unique biodiversity opportunity to create the first chalk spring-fed reservoir, including monitoring the development of a unique wetland environment.	The Project seeks to make the best use of Havant Thicket Reservoir by using recycled water to supplement the quantity of water resources available. Tables 4.2 – 4.7 and 4.10 in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1) demonstrate that the chemistry of the recycled water is more similar to that of the spring water than that of water from the headwaters of Riders Lane Stream. While the Applicant acknowledges that, as described in Tables 4.3 – 4.7 and 4.10 in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1), there are differences in the chemistry of the spring and recycled water, the assessment presented in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) demonstrates that the introduction of recycled water into Havant Thicket Reservoir would result in a small improvement in water quality, reflecting the reductions in parameters such as phosphorus and nitrate. The assessment concludes that the treatment measures incorporated into the design of the Water Recycling Plant would be sufficient to prevent significant adverse effects on water quality in the reservoir and therefore biodiversity. This is confirmed in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1). The wetland area along the northern margin of Havant Thicket Reservoir will be predominantly fed by the existing headwaters of Riders Lane Stream, rather than the reservoir itself. The modelling exercise contained within ES Appendix 19.6 Havant Thicket Reservoir Compensatory Flows water quality modelling [APP-201] also indicated that there will be limited movement of water from the main body of Havant Thicket Reservoir across the five control structures to the

Reference	RR references	Summary of issue raised	The Applicant's response
			wetland. It is therefore considered that the Project will not impact the creation of the wetland environment. Post-construction monitoring of surface and groundwater receptors, including Havant Thicket Reservoir, is described in section 4.4 of ES Appendix 19.9 Outline Water Monitoring Plan [APP-204].
RR-TFB-12	RR-254, RR-331, RR-354	Concerns over impacts on chalk stream ecosystems, including the River Itchen SAC, as sensitive indicators of wider environmental health.	The Applicant shares concerns for the chalk stream ecosystems within Hampshire. 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 through a reduction in abstraction. Both the River Itchen and River Meon will be crossed via trenchless techniques to avoid loss of riparian habitat along these chalk streams and no significant adverse effects are expected as a result of the Project. Indeed, the reduction in abstraction from the Rivers Test and Itchen is expected to have a significant beneficial effect on these internationally important habitats.
RR-TFB-13	RR-309	Comment on wildlife attractants as a potential issue the Examining Authority should consider.	As outlined in the Statement of Engagement [APP-072] The Applicant engaged with Southampton Airport before the submission of the DCO. Southampton Airport raised issues relating to potential bird strike risk associated with the temporary commissioning lagoons required during pipeline testing. Through correspondence, Southampton Airport confirmed that, given the temporary nature, small scale and distance of the lagoons from the airport, the overall risk of bird strike was considered to be low. Further, the Airport requested that measures be included to prevent feral geese from nesting and that they be notified when the lagoons would hold water. These measures were incorporated into the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). The implementation of these measures was deemed to satisfy the Airport's requirements, and it was confirmed in writing that no additional measures were required. The Applicant will continue to engage with Southampton Airport during Examination to seek clarification on the matters raised in its Relevant Representation, including building heights, wildlife attractants and solar photovoltaic infrastructure, to confirm whether any further mitigation is required.
RR-TFB-14	RR-122, RR-129, RR-354	Concerns that the Habitats Regulations Assessment does not adequately address all risks to protected sites, including in-combination effects with other effluent-recycling schemes (Eastney LSO, Isle of Wight, Ford) for persistent contaminants.	The Habitats Regulation Assessment – Stage 2 Appropriate Assessment and Marine Conservation Zone – Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2) for the Project and ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) assess the potential impact pathways arising from the Project that could affect the ecology of Chichester and Langstone Harbours SPA and Ramsar, Solent Maritime SAC and Langstone Harbour SSSI. These documents conclude no adverse effect on the integrity of these sites and that no significant adverse effects will occur as a result of the Project.

Reference	RR references	Summary of issue raised	The Applicant's response
			In-combination effects, including for the Isle of Wight Water Recycling Project and Ford Water Recycling Project, are detailed within the Habitats Regulation Assessment – Stage 2 Appropriate Assessment and Marine Conservation Zone – Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2). The Habitats Regulations Assessment undertaken for the Isle of Wight Water Recycling Project concluded no adverse effects on the integrity of the relevant National Site Network Sites (Solent and Isle of Wight Lagoons SAC, and Solent and Southampton Water SPA and Ramsar). Further detail and data regarding the reduction of contaminants during the water recycling process is provided in ES Chapter 19 Water Environment (Document reference 6.1, DCO Volume 6, Version 1). The assessments were undertaken following relevant guidance and concluded no in-combination adverse effects.
RR-TFB-15	RR-354	Concerns that the proposed change to Environment Agency enforcement powers in Schedule 8 could prevent appropriate action to protect rare protected species or future SSSI-worthy biodiversity at the reservoir.	The Applicant refers to its response to RR-253-55 in the Applicant's response from local planning authorities, parish councils, and statutory consultees (Document refence 8.5, DCO Volume 8, Version 0). Schedule 8 includes a modification such that an enforcement notice in relation to over-abstraction may be issued where there is a risk to a public water supply. Abstraction without a licence, or contrary to the conditions of a licence, remains an offence under section 24 of the Water Resources Act 1991. The Applicant is therefore confident that the modifications in Schedule 8 do not prevent action being taken by the Environment Agency in relation to any breach of abstraction licence. The Applicant is in discussion with the Environment Agency in relation to the provisions in Schedule 8, including in relation to the modification of the circumstances under which an enforcement notice may be issued.
RR-TFB-16	RR-354	Concerns over impacts on the retained shallow wetland compartments forming part of the mitigation, compensation and biodiversity net gain originally secured for the spring-fed reservoir.	The Project involves the input of recycled water to Havant Thicket Reservoir to increase its deployable output as a public water supply. The wetland area along the northern margin of Havant Thicket Reservoir will be predominantly fed by the existing headwaters of Riders Lane Stream, rather than the reservoir itself. The modelling exercise contained within ES Appendix 19.6 Havant Thicket Reservoir Compensatory Flows water quality modelling [APP-201] also indicated that there will be limited movement of water from the main body of Havant Thicket Reservoir across the five control structures to the wetland. It is therefore considered that the Project will not impact the creation of the wetland environment. Due to the lack of connectivity between the wetland habitats and Havant Thicket Reservoir, it is considered that biodiversity, Biodiversity Net Gain benefits and the protected species the habitat may support will not be adversely affected by the Project.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-TFB-17	RR-294, RR-354	Suggestions that route selection should avoid nationally and internationally designated sites (SAC, SPA, SSSI, Ancient Woodland, SINCs) and sensitive habitats (wetlands, ponds, woodlands, species-rich and unimproved chalk grassland), using trenchless technology where avoidance is not possible.	The Project has been designed to avoid all statutory designated sites and ancient woodland and, where practicable, to avoid non-statutory designated sites including Sites of Importance to Nature Conservation (SINCs). Buffers between the Order Limits and designated sites were designed on a case-by-case basis and where avoidance of a non-statutory designated site was not practicable, appropriate mitigation has been included within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) and Outline Landscape and Ecology Management Plan (LEMP) (Document reference 7.5, DCO Volume 7, Version 1). No statutory designated sites or ancient woodland will be lost to the Project. Trenchless techniques will be utilised for the crossings of all main rivers, ensuring no loss of these riparian habitats. Where impacts to SINCs (Field to West of Gillman Road SINC and Fielders Farm Meadows (Eastleigh) SINC) are anticipated through open-cut construction and construction compounds, all habitats will be reinstated as soon as reasonably practicable following the completion of construction. Furthermore, an Environmental Mitigation Enhancement Area (EMEA) is proposed within the Fielders Farm Meadows (Eastleigh) SINC to enhance the condition of the grassland and coastal floodplain grazing marsh habitats following construction (EMEA_L_4 and 5). Furthermore, habitat creation and enhancements are proposed in other EMEAs along the project, including the creation of wet woodland and lowland calcareous grassland. Details of EMEAs are included within ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) and reinstatement methodology is detailed in the Outline LEMP (Document reference 7.5, DCO Volume 7, Version 1).
RR-TFB-18	RR-354	Suggestions that the Applicant should fund additional measures delivering a minimum of 10% biodiversity net gain within Havant Borough.	The Applicant has committed to the delivery of 10% Biodiversity Net Gain (BNG) across the Project, as set out in the Biodiversity Gain Plan [APP-426]. The location of Biodiversity Net Gain will be informed by the Hampshire Nature Recovery Strategy Areas and wider objectives including climate resilience, habitat connectivity and social value. Within Havant Borough Council the Applicant has agreed to fund £500,000 worth of additional enhancements to Broadmarsh Coastal Park as part of the wider benefits and legacy of the Project. Where appropriate, these enhancements will count towards the Project's overall BNG. This work will deliver real long-term meaningful benefits to the local environment and community.
RR-TFB-19	RR-006, RR-040, RR-225	Concerns over impacts on the wider ecosystem and long-term ecological balance, including the need for environmental restoration and monitoring measures.	The Project has been designed to reduce impacts on wider ecosystems and potential long-term operational impacts where practicable. Mitigation measures include trenchless crossings at main rivers, a reduced working width at trenched open-cut hedgerow and watercourse crossings and implementation of measures such as temporary fencing to help maintain habitat connectivity to the wider landscape for protected species, including bats and dormouse, this is

Reference	RR references	Summary of issue raised	The Applicant's response
			detailed in the Outline Construction Environmental Management Plan (CEMP) (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). All temporarily impacted habitats will be reinstated, the reinstatement strategy is detailed in the Outline Landscape and Ecology Management Plan (LEMP) (Document reference 7.5, DCO Volume 7, Version 1). Monitoring responsibilities and measures to ensure establishment of habitats have been considered and are detailed in the Outline LEMP. The Project has also been designed to include proposed areas of habitat creation and enhancement known as Environmental Mitigation and Enhancement Areas (EMEAs), which includes but is not limited to, the proposed creation of species-specific mitigation (as required by the detailed design), areas of calcareous grassland, woodland, scrub and the proposed enhancements of neutral grasslands, hedgerows and treelines, to create additional opportunities for biodiversity in the wider landscape. The EMEAs are detailed within ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1).

Table 2-33 Summary of issues raised on the theme of the Applicant's wider operations and Project interfaces and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-WSWO-01	RR-001, RR-002, RR-003, RR-005, RR-007, RR-009, RR-011, RR-025, RR-026, RR-031, RR-036, RR-045, RR-050, RR-054, RR-056, RR-058, RR-060, RR-062, RR-070, RR-071, RR-076, RR-098, RR-105, RR-115, RR-117, RR-139, RR-150, RR-151, RR-157, RR-161, RR-164, RR-166, RR-168, RR-175, RR-176, RR-177, RR-188, RR-197, RR-201, RR-206, RR-209, RR-211, RR-217, RR-218, RR-223, RR-230, RR-235, RR-239, RR-266, RR-267, RR-271, RR-275, RR-284, RR-288, RR-289, RR-292, RR-300, RR-321, RR-334, RR-335, RR-352, RR-353, RR-354	Concerns about the Applicant's poor operational track record, including illegal sewage discharges, pollution incidents, treatment plant failures, monitoring failures and regulatory fines.	The Applicant recognises concerns about reputation, particularly in relation to water pollution, fines, asset maintenance and operational performance. The 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 would use multiple treatment barriers before blending and final treatment at Otterbourne Water Supply Works, as described in Environmental Statement (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. The Project would also require regulated discharge consents from the Environment Agency.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-WSWO-02	RR-001, RR-002, RR-003, RR-007, RR-009, RR-011, RR-015, RR-026, RR-036, RR-050, RR-054, RR-056, RR-058, RR-062, RR-070, RR-071, RR-076, RR-081, RR-084, RR-098, RR-101, RR-115, RR-123, RR-129, RR-139, RR-145, RR-151, RR-154, RR-155, RR-159, RR-161, RR-166, RR-168, RR-175, RR-197, RR-201, RR-203, RR-209, RR-211, RR-212, RR-213, RR-217, RR-218, RR-223, RR-230, RR-235, RR-239, RR-245, RR-266, RR-267, RR-268, RR-275, RR-281, RR-284, RR-288, RR-289, RR-292, RR-300, RR-321, RR-334, RR-335, RR-352, RR-353, RR-354	Concerns over the Applicant's track record of pollution incidents and maintenance failures, and a resulting lack of public trust and confidence in its ability to safely deliver, operate and maintain the WRP and Project.	The Applicant recognises that public trust is important where a project affects drinking water supply. The Applicant's wider programme to improve operational performance and rebuild trust is addressed in RR-WSWO-01. The Project would not rely on trust alone. It is subject to independent scrutiny through the Development Consent Order (DCO) examination and separate regulatory processes, including environmental permitting and Drinking Water Inspectorate regulation. It would only be able to operate where the necessary treatment, monitoring, risk assessment and operational controls are in place and where water supplied to customers meets statutory drinking water standards. The treatment process is described in ES Chapter 3 Description of the Proposed Development [APP-082].
RR-WSWO-03	RR-003, RR-009, RR-011, RR-026, RR-036, RR-081, RR-145, RR-157, RR-230, RR-235, RR-266, RR-275, RR-288, RR-300, RR-352, RR-354	Concerns about the Applicant's capability to design, build, operate and maintain a highly complex water recycling facility, associated infrastructure and long pipelines to the required standard on a continuous basis.	While the Project is technically complex, the Applicant would draw on technical expertise in water recycling, including relevant international experience, and would be supported by a contractor through the Direct Procurement for Customers (DPC) process. The contractor would be expected to have relevant capability and experience in delivering and operating comparable complex infrastructure and would be responsible for managing risks associated with construction and operation. The development of the Project for the DCO application has sought to avoid or reduce identified impacts during construction and operation, and where necessary mitigate them, as far as reasonably practicable. The Outline Construction Environmental Management Plan (CEMP) (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) includes control measures which are designed to achieve regulatory compliance as a minimum and

Reference	RR references	Summary of issue raised	The Applicant's response
			additionally, to accord with good practice, where relevant, and to mitigate or control environmental effects during the construction of the Project. Detailed designs for Above Ground Plant would be developed post-consent by the appointed contractor but would be required to adhere to the Project's Design Principles and be subject to local authority approval, providing further safeguards for good design. The water recycling process would use a multi-barrier treatment approach, with monitoring, automated controls and operational safeguards, as described in ES Chapter 3 Description of the Proposed Development [APP-082]. The response to RR-WSWO-02 addresses the wider point about independent scrutiny and public trust.
RR-WSWO-04	RR-009, RR-045, RR-168, RR-209, RR-266, RR-268, RR-281, RR-289, RR-300, RR-353, RR-354	Concerns that the Applicant has misreported, falsified or manipulated regulatory and monitoring data, undermining trust in future assurances.	The Applicant notes the concerns raised about regulatory and monitoring data and wider confidence. The DCO examination is concerned with whether the Project should be consented, whether its effects have been properly assessed, and whether appropriate mitigation and controls would be secured. The Project would be subject to independent scrutiny, environmental permitting, Drinking Water Inspectorate regulation, monitoring and enforcement requirements before it could operate. The response to RR-WSWO-02 addresses the wider point that the Project would not rely on trust alone.
RR-WSWO-05	RR-009, RR-050, RR-056, RR-076, RR-136, RR-146, RR-161, RR-166, RR-172, RR-190, RR-211, RR-243, RR-245, RR-254, RR-261, RR-266, RR-268, RR-300, RR-321, RR-334	Concerns that the Applicant prioritises shareholder dividends, executive bonuses and profits over infrastructure investment, customer service and environmental protection.	Matters regarding shareholder dividends, executive bonuses and wider financial decisions across the water industry are broader policy and regulatory matters and are outside the remit of the DCO examination for this Project. However, the Applicant notes, that as a regulated industry, the return the Applicant can make on investment is controlled by Ofwat, the water industry economic regulator. Ofwat exists to protect customers and ensure water companies deliver value for money by controlling the costs that can be charged to customers. The Applicant's wider programme to improve operational performance and rebuild trust through its Turnaround Plan is addressed in RR-WSWO-01.
RR-WSWO-06	RR-018, RR-105, RR-150, RR-155, RR-157, RR-206, RR-266, RR-288, RR-354	Concerns that self-regulation and self-monitoring by the Applicant is not acceptable, and that robust independent scrutiny, oversight, audit and verification of the Project are essential.	The Project would not rely on self-regulation or self-monitoring alone. Drinking water quality would be regulated by the Drinking Water Inspectorate, including requirements for risk assessment, treatment, monitoring and compliance with The Water Supply (Water Quality) Regulations 2016. The treatment process, blending and final treatment are described in ES Chapter 3 Description of the Proposed Development [APP-082]. The output from the water recycling plant will be subject to an environmental permit, controlling the quality of the water discharged into the Havant Thicket Reservoir. As set out in the National Policy Statement for Water Resources Infrastructure, at paragraph 3.8.3, the Secretary of State "should assess the potential impacts of processes, emissions or discharges to inform decision making, but should work on the assumption that, in terms of the control and enforcement, the relevant pollution

Reference	RR references	Summary of issue raised	The Applicant's response
			control or other consenting regime will be properly applied and enforced". For further information about the relationship between the DCO and the applicable regulatory regimes, please refer to Appendix D and 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).
RR-WSWO-07	RR-050, RR-071, RR-076, RR-145, RR-354	Concerns about the Applicant's poor record on managing water leaks and network integrity, and the risk this poses to the long pipeline associated with the Project.	The Applicant recognises concerns about leakage, network integrity and the implications for the pipeline infrastructure associated with the Project. The Applicant's wider leakage performance improvements are addressed in RR-WSWO-01. The Project's pipelines and associated assets would be designed, constructed, tested and commissioned in accordance with relevant standards and the requirements secured through the DCO and detailed design process. Operational arrangements would include inspection, monitoring, maintenance and emergency response procedures appropriate to the nature of the infrastructure. Operational environmental controls are addressed in the Operational Environmental Management Plan [APP-422].
RR-WSWO-08	RR-062, RR-071, RR-080, RR-166, RR-354	Concerns about the interface between the Applicant and Portsmouth Water, including risks to Portsmouth Water's ability to supply its existing customers.	The Project has been developed in the context of the wider water resources planning framework, including the role of Havant Thicket Reservoir and associated transfer and treatment arrangements. Interfaces with Portsmouth Water would need to be managed through the relevant commercial, operational, regulatory and consenting arrangements, including the Bulk Supply Agreement. Portsmouth Water customers are only anticipated to receive water from Havant Thicket Reservoir through separate bulk supply arrangements in prolonged dry weather or emergency conditions. The Project would not remove Portsmouth Water's obligations to its customers or the Applicant's obligations to its own customers, but it should be noted that the reservoir is being provided with the sole purpose of enabling additional water supplies to be provided to the Applicant. Any operational arrangements would need to ensure that water quality, supply resilience and regulatory compliance are maintained. Please also refer to Appendix E 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) which confirms the basis, in respect of water supply need, on which the commercial agreements have and are being negotiated. Portsmouth Water does not rely on the reservoir to meet its water supply duty.
RR-WSWO-09	RR-096, RR-200	Statements that customers currently supplied by Portsmouth Water may become customers of the Applicant as a result of the Project.	The Project does not determine customer boundary or retail supply arrangements. Water companies are appointed by Ofwat under the Water Industry Act 1991 and operate under licences. Each company's instrument of appointment sets out the area for which the appointment is made, thereby establishing the customer base of each water undertaker. The Project does not affect any appointment of any water undertaker, nor does it alter any supply area or transfer any customers from Portsmouth Water to Southern Water.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-WSWO-10	RR-238, RR-294	Concerns about the interface between the Project and the Applicant's other separately planned schemes, including the expansion of Otterbourne Water Supply Works, the Ford Water Recycling Project in West Sussex and the Littlehampton effluent recycling scheme.	The Project has been assessed on the basis of the works and operation for which development consent is sought. Other water recycling proposals and works at Otterbourne Water Supply Works are separate projects and would be subject to their own planning, environmental assessment, permitting and regulatory processes where required. Where interfaces or potential cumulative effects are relevant to this Project, they are considered in ES Chapter 20 Cumulative and in-combination effects [APP-099] and ES Appendix 20.2 Cumulative effects assessment [APP-209]. The Applicant will continue to manage defined interfaces through programme planning, stakeholder engagement, design development and the applicable consenting and regulatory processes.
RR-WSWO-11	RR-037, RR-050, RR-056, RR-070, RR-076, RR-115, RR-117, RR-150, RR-157, RR-168, RR-177, RR-194, RR-211, RR-217, RR-266, RR-267, RR-268, RR-271, RR-275, RR-278, RR-288, RR-290, RR-300, RR-334, RR-354	Concerns about ongoing illegal or unauthorised sewage discharges from the Applicant's existing infrastructure into rivers, harbours and coastal waters, and the resulting environmental and public health impact.	The Applicant recognises concerns about sewage discharges from existing infrastructure and the associated effect on confidence in the water industry. The Applicant's wider programme to improve operational performance, including reduced pollution incidents under its Turnaround Plan, is addressed in RR-WSWO-01. The Project would not authorise uncontrolled discharges or remove the Applicant's obligations in relation to existing wastewater assets. Potential effects on the water environment from the Project have been assessed in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1), and the discharge from the Eastney Long Sea Outfall has been modelled in ES Appendix 19.5 Eastney Long Sea Outfall Solent dispersion modelling [APP-200]. The Project would use treated wastewater as a resource within a controlled water recycling process and would remain subject to environmental permitting and drinking water quality regulation before operation.
RR-WSWO-12	RR-004, RR-007, RR-011, RR-018, RR-168, RR-206, RR-266, RR-288, RR-354	References to recent and ongoing criminal proceedings, prosecutions and enforcement action against the Applicant and its directors, including record fines for pollution offences and manipulation of regulatory data.	The Applicant notes the concerns raised about recent criminal proceedings and wider confidence in the company. The Applicant's wider programme to improve operational performance is addressed in RR-WSWO-01. The DCO examination is concerned with whether this Project should be consented, whether its effects have been appropriately assessed, and whether the proposed mitigation and controls are sufficient. The Project would be subject to independent scrutiny through the DCO process and through the relevant environmental and drinking water quality regulatory regimes. Any operation of the Project would need to comply with the permits, approvals, monitoring requirements and statutory standards that apply to it, and non-compliance would remain subject to the relevant enforcement powers.
RR-WSWO-13	RR-136, RR-238, RR-294	Comments on wider regional water demand pressures and the interface between the Applicant's schemes and other developments, including housing growth in the south of England and follow-on water recycling projects.	The need for the Project has been identified through the water resources management planning process, which considers future demand, supply resilience, environmental constraints and regional water resources planning. The Project has been brought forward to address an identified public water supply deficit and is being assessed through the DCO process on its own merits. The need for the Project is set out in Case for the Project (Document reference 5.6, DCO Volume 5, Version 1). Other developments or future

Reference	RR references	Summary of issue raised	The Applicant's response
			schemes would be subject to their own planning, environmental assessment and regulatory processes. Where relevant, cumulative effects and the interface of the Project with other schemes and developments have been considered in ES Chapter 20 Cumulative and in-combination effects [APP-099] and ES Appendix 20.2 Cumulative effects assessment [APP-209].
RR-WSWO-14	RR-354	Concerns about the Applicant's approach to controlling and monitoring industrial and commercial discharges into the Budds Farm WTW catchment, and the risk this poses to recycled water quality entering Havant Thicket Reservoir.	The Applicant carried out a pilot plant investigation that included a Full Advanced Treatment (FAT) process and used the final output of the Budds Farm Wastewater Treatment Works as its source. The pilot plant demonstrated the performance of the FAT process on the treatment of the source material, and represents a reasonable worst case assessment given the Water Recycling Plant will additionally include treatment with Granular Activated Carbon. In order to ensure the quality of the recycled water, even if there is variability in the output from Budds Farm Wastewater Treatment Works, the multi-stage water recycling process would feature numerous safeguards, including continuous monitoring of water quality at the inlet, interstage points and final discharge, together with system performance using real-time sensors and automated controls. These ensure that, in the unlikely event that a significant deviation in expected water quality occurs, it can be quickly identified and rectified through partial or full system shutdowns or diversion. The final output of recycled water must comply with the environmental permit, issued by the Environment Agency. Accordingly, changes to the quality of the final effluent will be managed to ensure that, at all times, the output water quality meets or exceeds the required standards.
RR-WSWO-15	RR-125, RR-161	Concerns about odour, nuisance and amenity impacts associated with the Applicant's operations in the local area.	The Applicant recognises concerns about odour, nuisance and amenity impacts associated with existing operations in the local area. For the Project, potential construction and operational effects, including amenity effects where relevant, have been assessed through the DCO application. Mitigation and control measures will be secured through the application documents and through any relevant environmental permits or operational requirements. The Applicant would be required to construct and operate the Project in accordance with those controls. Concerns about existing operations do not remove the need to assess the Project on its own merits, but they underline the importance of effective mitigation, monitoring, maintenance and engagement with affected communities. The assessment of effects relating to odour, nuisance and amenity effects in relation to the Project can be found in ES Chapter 6 Air quality and odour (Document reference 6.1, DCO Volume 6, Version 1), and ES Chapter 15 Noise and vibration [APP-094] and outlined in the Statutory Nuisance Statement [APP-054].

Reference	RR references	Summary of issue raised	The Applicant's response
RR-WSWO-16	RR-021, RR-058, RR-159, RR-166, RR-175, RR-245, RR-300, RR-354	Statements that customers and communities should have a meaningful say in the Applicant's decisions affecting their drinking water supply, drawing on wider concerns about the Applicant's conduct.	The Applicant recognises that customers and communities expect meaningful information and engagement where a project may affect future water supply. The DCO consultation was not required to operate as a customer-wide consultation on the principle of water recycling; it was directed to the Project, its infrastructure and its likely effects. Customer-wide engagement on water recycling has taken place through the Water Resources Management Plan, Your Water Matters events, dedicated customer insight polling and wider Water for Life – Hampshire engagement. The Applicant has also prepared a change-of-source engagement plan, which explains that targeted customer engagement will begin closer to the point at which any change of source is introduced, when operational information is mature and customer communications can be accurate, timely and useful. That future engagement will focus on why the source change is needed, how water quality will continue to be protected, what safeguards and monitoring will apply, and where customers can find more information. The consultation and engagement undertaken to date is reported in the Consultation Report [APP-029] and Statement of Engagement [APP-072].
RR-WSWO-17	RR-192, RR-300, RR-354	Observations that local authorities and elected representatives, including East Hampshire District Council and Havant Borough Council, have recorded serious concerns about public trust in the Applicant.	The Applicant notes the concerns recorded by local authorities and elected representatives about public trust. The Applicant recognises the importance of those concerns and the role of local authorities in representing the interests of their communities and has engaged with them accordingly as outlined in the Statement of Engagement [APP-072]. The Project will be tested through the DCO examination and through the relevant environmental and drinking water quality regulatory processes. The Applicant will continue to engage with local authorities, elected representatives, regulators and communities to explain the need for the Project, respond to concerns, and provide information on the treatment, monitoring and regulatory safeguards that would apply.
RR-WSWO-18	RR-354	Concerns that the landfill contamination risks for the Project also apply to the Sandown WRP, which will be built on a landfill site in the floodplain	The Sandown Water Recycling Plant is a separate project and would need to be assessed, consented, permitted and regulated on its own merits. Concerns about potential landfill contamination at Sandown do not determine the acceptability of this Project. The likely significant effects on land quality and ground conditions arising from the construction, operation and decommissioning of the Project, including effects associated with historical and existing sources of contamination, are assessed in ES Chapter 11 Land quality and ground conditions [APP-090] and construction controls are secured through the Outline Construction Environmental Management Plan – 3 documents [APP-412 – APP-414].

Table 2-34 Summary of issues raised on the theme of the draft DCO and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-DCO-01	RR-018, RR-069, RR-192, RR-294, RR-354	Concerns that the draft Development Consent Order (DCO) (Articles 3(1)(b), 5, 46 and Schedule 8) effects a fundamental repurposing of the Havant Thicket Reservoir from spring-fed storage to storage of recycled water without varying the existing planning permissions.	The Applicant notes this comment and confirms that this is the intended purpose and effect of the provisions highlighted. It is entirely appropriate that the draft Development Consent Order (DCO) [APP-023] manages the inclusion of the Havant Thicket Reservoir into the overall Project. This drafting ensures that the use of the reservoir to store recycled water for the Project, as has been fully assessed within the Environmental Statement (ES) (see ES Chapter 19 Water environment in particular (Document Reference 6.1, DCO Volume 6, Version 1)), is given effect and does not give rise to any enforcement issues connected with the more limited scope of the original planning application.
RR-DCO-02	RR-018, RR-294, RR-354	Concerns that Article 5(8) overrides the spring water only planning conditions by deeming, without the application, consultation and local determination that variation would ordinarily require.	The Applicant notes this comment and confirms that this is the intended purpose and effect of the provisions highlighted. It is entirely appropriate that the draft DCO [APP-023] manages the inclusion of the Havant Thicket Reservoir into the overall Project. This drafting ensures that the use of the reservoir to store recycled water for the Project, as has been fully assessed within the ES (Document reference 6.1, DCO Volume 6, Version 1), is given effect and does not give rise to any enforcement issues connected with the more limited scope of the original planning application. The Planning Act 2008 (PA 2008) provides a process through which the concerns of residents, local planning authorities and other stakeholders can be properly considered, in the context of the proposals forming part of the project that Havant Thicket Reservoir is used for these purposes. The Relevant Representations stage, followed by Examination of the proposals, provide the opportunity for the complete project, including the authorisation of the use of Havant Thicket Reservoir for recycled water, to be considered together with the national interest arising from a project of national significance.
RR-DCO-03	RR-018, RR-192, RR-294, AS-033	Concerns that the Planning Inspectorate's section 51 advice of 22 October 2025 identified the reservoir modification provisions as blank and presumed novel, and that the drafting was not made available at a stage when significant advice could have been given.	Applicants are under no duty to seek the advice of the Planning Inspectorate. It has been clear through the Applicant's consultations and communications that its DCO application would seek to authorise the storage of recycled water within Havant Thicket Reservoir and the draft DCO [APP-023] provides for that. All interested parties will have the opportunity to participate in the examination of the Applicant's proposals.
RR-DCO-04	RR-018, RR-294, RR-354, AS-033	Concerns that Articles 5, 46 and Schedule 8 (and related provisions) are ultra vires under section 120(5) of the Planning Act 2008 and should be removed or modified.	Section 120 of the PA 2008 sets out what may be included in an order granting development consent. Section 120(3) confirms that an order may make provision relating to, or to matters ancillary to, the development for which consent is granted. It is clear, therefore, that a DCO is not constrained only by the specific development being authorised, but may, and is expected to, make provision for elements beyond and supporting the development. Section 120(5)(a) further provides specifically that an order granting development consent may "apply, modify or exclude a statutory provision which relates to any matter for which provision may be made in the order;"

Reference	RR references	Summary of issue raised	The Applicant's response
			Far from being ultra vires, the draft DCO [APP-023] makes effective use of the provisions of section 120 to give effect to the intended purpose of the Planning Act 2008, namely to provide a 'one stop shop' for the key consents, authorisations and other matters needed to implement nationally significant infrastructure projects.
RR-DCO-05	RR-018, RR-294	Concerns that the Explanatory Memorandum provides no provision-by-provision justification demonstrating that the modifications are necessary or expedient within section 120(5).	The Applicant's Explanatory Memorandum to Draft Order [APP-024] contains an explanation of the purpose and effect of each of the provisions in the draft DCO [APP-023]. The Annex to the Explanatory Memorandum extends this approach to Schedule 8. The fundamental purpose of the Project is to support the Applicant's public water supply by making provision for the recycling of water, and for its conveyance to and from Havant Thicket Reservoir for storage, and thereafter for its transfer into the Applicant's public supply. The modifications to the provisions set out above are necessary to safeguard the practical fulfilment of these purposes and so are clearly within the scope of what may be included in a development consent order.
RR-DCO-06	RR-018, RR-354	Concerns that Schedule 1 and Schedule 2 of the dDCO contain no requirements addressed to the Havant Thicket Reservoir and that nothing in the draft DCO controls what happens at the reservoir.	The requirements of the draft DCO [APP-023] are contained in Schedule 2. It is correct to say that none of the requirements extend to the Havant Thicket Reservoir as the reservoir will continue to be constructed and operated by Portsmouth Water in accordance with the provisions of the relevant planning permissions. The draft DCO would only interfere with those planning permissions in so far as they are inconsistent with it. That is to say, it would permit the use of the Havant Thicket Reservoir infrastructure for the purposes of the Project notwithstanding conditions that seek to limit the reservoir's use to only spring water. In this regard it is important to note the important role played by the Environment Agency in operating the abstraction licensing and environmental permit regimes which collectively would control the discharge of water into, and abstraction of water out of, Havant Thicket Reservoir. Furthermore, paragraph 3.8.3 of the National Policy Statement for Water Resources Infrastructure requires the Secretary of State when determining an application to 'focus on whether the development is an acceptable use of the land, and on the impacts of that use, rather than the control of processes, emissions or discharges themselves... Decisions under the Planning Act should complement *but not duplicate* those taken under the relevant pollution control regime.' (emphasis added) The Applicant considers that it would be duplicative of those environmental regimes to seek to include in the DCO requirements that seek to control processes, emissions or discharges. Please also refer to Action Point ISH1-06 in 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 further information on the relationship between the DCO and existing regulatory regimes.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-DCO-07	RR-018	Concerns that the Invasive Non-Native Species Biosecurity Plan passes responsibility for reservoir biosecurity to a Portsmouth Water plan that is not secured by, or certified under, the draft DCO.	The Applicant's Invasive Non-Native Species Biosecurity Plan [APP-425] includes the appropriate measures to address risks associated with invasive non-native species (INNS) as they relate to the development for which the Applicant seeks development consent. The authorised development must be constructed, operated and maintained in accordance with the Plan, as secured by Requirement 14 in Schedule 2 to the draft DCO [APP-023].
RR-DCO-08	RR-018, RR-354	Concerns that Article 46(1)'s disapplication of sections 28E, 28H and 28I of the Wildlife and Countryside Act 1981 has been widened rather than removed, contrary to the Planning Inspectorate's section 51 advice, and lacks the fuller justification requested.	The Applicant had regard to the Planning Inspectorate's advice and paragraphs 12.6 to 12.13 of the Explanatory Memorandum to Draft Order [APP-024] sets out a full and detailed justification for the proposed disapplications. In summary, it is appropriate for those provisions to be disapplied to avoid a duplicative parallel consenting process outside the DCO.
RR-DCO-09	RR-018, RR-354, AS-033	Concerns that Article 46(1) of the draft DCO disapplies statutory protections (including byelaws under the Land Drainage Act 1991, Water Industry Act 1991, Water Resources Act 1991 and Environmental Permitting Regulations 2016) in relation to the whole of the authorised development, not just the reservoir interface.	It is important to note that it has been a foundational feature of the PA 2008 regime since its inception that it ought to, so far as is appropriate, seek to be a single consenting process in order to facilitate the timely delivery of the important national infrastructure and the wider public benefits it will bring. The Applicant's approach is entirely consistent with this ethos. Paragraphs 12.1 to 12.6 of the Explanatory Memorandum to Draft Order [APP-024] explain and justify each of the proposed disapplications.
RR-DCO-10	RR-018, RR-096, RR-129, RR-153, RR-354	Concerns that Schedule 8 of the draft DCO caps Portsmouth Water's abstraction from the Havant Thicket Reservoir at 25 Ml/d in aggregate, removing operational flexibility for future supply, drought and emergency use.	Schedule 8 of the draft DCO [APP-023] secures for each party abstraction volumes that reflect the negotiated contractual position. Portsmouth Water is contractually entitled to take up to 25Ml/d from Havant Thicket Reservoir, which acts as compensation water for water that Portsmouth Water provides to Southern Water at Gaters Mill. It should be noted that Havant Thicket Reservoir is funded by Southern Water customers to meet Southern Water's supply requirements, both through providing up to 25Ml/d of compensation water to Portsmouth Water, and through the storage of water, including recycled water, as part of the Project. In order to ensure that the water need identified by Southern Water is available for abstraction when needed, Schedule 8 is drafted to reflect and enable the underlying contractual arrangements to be carried out, including that Southern Water has an unfettered right to the water in the reservoir. Any abstraction licence for more than 25Ml/d could not be utilised by Portsmouth Water under the contractual arrangements relating to the Havant Thicket Reservoir. This key principle is recognised by Ofwat in RR-232: the Havant Thicket Reservoir project "is being delivered by Portsmouth Water *for the benefit of Southern Water's customers*" [emphasis added]. Abstraction by Portsmouth Water (or any third party) in excess of 25Ml/d is not envisaged by the contractual negotiations. If carried out, it would be contrary to the purpose of the reservoir as confirmed by Ofwat, and has the potential to reduce the water available to Southern Water's customers. Please also refer to the joint statement at Appendix E to The Applicant's written summaries of oral submissions at OFH1 and ISH1 and post hearing

Reference	RR references	Summary of issue raised	The Applicant's response
			actions (Document reference 8.9, DCO Volume 8, Version 0) for further information about the commercial principles underpinning the Havant Thicket Reservoir and the Project.
RR-DCO-11	RR-018, RR-354, AS-033	Concerns that Schedule 8 of the draft DCO removes Portsmouth Water's protected abstraction rights at the Havant Thicket Reservoir and prioritises Southern Water's abstraction.	Please refer to RR-DCO-10, and the joint statement at Appendix E to 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). Schedule 8 of the draft DCO [APP-023] recognises that Portsmouth Water is entitled only to take water from the reservoir where it has already supplied an equivalent volume of water to Southern Water, whilst Southern Water is entitled to take the water from the reservoir directly to serve its water supply. It does this through requiring the grant of a licence to Southern Water of at least the full water requirement. It resolves the issue, caused by the fact that an abstraction licence may not be granted if it derogates from existing protected rights other than by agreement by stipulating that Portsmouth Water's abstraction rights are not protected rights for this purpose. It is noted that, were Portsmouth Water's rights to be protected, and a later application by Southern Water to be considered to derogate from those rights, Portsmouth Water would need to agree to the grant of the licence. If it did not do so, the Secretary of State would need to direct the EA to grant the licence notwithstanding the derogation, at which point compensation would become payable by the EA to Portsmouth Water. Accordingly, Schedule 8 provides a safeguard to ensure that it secures the full volumes of water relied on for its supply, consistent with the need established through the WRMP process. Please also refer to RR-253-35, in The Applicant's responses to Relevant Representations from local authorities, parish councils, and statutory consultees (Document reference 8.5, DCO Volume 8, Version 0).
RR-DCO-12	RR-018, RR-354, AS-033	Concerns that Schedule 8 of the draft DCO requires the Applicant's consent before any other person may apply for, vary or revoke an abstraction licence, impounding authorisation or water discharge permit relating to the Havant Thicket Reservoir.	The provisions referred to provide protection for Southern Water in recognition that the Project relies on the Havant Thicket Reservoir as a fundamental component, but this is an asset that is owned, operated, managed and controlled by a third party (i.e. Portsmouth Water). In order to secure the public benefits of the Project, it is important to ensure that Southern Water is consulted and given full rights to be heard in relation to an application, addressing the risk that, as it does not own the Havant Thicket Reservoir, it is not able to simply refuse to allow a third party to access, use or otherwise affect the reservoir. Portsmouth Water, as the owner and operator of Havant Thicket Reservoir, is able to refuse to allow a third party to access, use or affect the reservoir.
RR-DCO-13	RR-018, RR-294, RR-354	Concerns that Schedule 8 of the draft DCO substitutes a 'risk to the resilience of a public water supply' test for 'significant damage to the environment' as the	Notwithstanding this, the Applicant is content to amend paragraph 4 of Schedule 8 of the draft DCO [APP-023] to reinstate the ability of the EA to issue an enforcement notice where there is a risk of environmental harm, and to clarify the mechanism by which the EA would be aware that there is a risk to

Reference	RR references	Summary of issue raised	The Applicant's response
		trigger for Environment Agency enforcement at the Havant Thicket Reservoir, weakening environmental protection.	a public water supply. The Applicant intends to discuss revised drafting with the Environment Agency and this amendment will be included in an update to the draft DCO [APP-023] in due course.
RR-DCO-14	RR-018, RR-354	Concerns that Schedule 8 of the draft DCO constrains the Environment Agency's regulatory discretion, including by requiring the Applicant's consent to any reduction of its minimum authorised abstraction quantities and by exempting the Applicant's own applications from advertising requirements.	Schedule 8 to the draft DCO [APP-023] secures the volume of abstraction required for the Project to meet the identified water supply need. In the unlikely event Portsmouth Water applies for its abstraction licence after the Applicant, paragraph 5 secures that a licence may be granted to Portsmouth Water of up to 25Ml/d (the volume of water required under the underlying commercial arrangements) without this being a derogation from the Applicant's abstraction rights. This reflects that the commercial arrangements anticipate Portsmouth Water taking up to 25Ml/d of water whilst the Applicant may take up to 90Ml/d. Please refer to the joint statement at Appendix E to 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 more information. Schedule 8 to the draft DCO [APP-023] provides a safeguard to ensure that it secures the full volumes of water relied on for its supply, consistent with the need established through the WRMP process. This is secured directly in recognition of the principle that Orders made under the Planning Act 2008 should, as far as possible, include all consents required for the Project, and reflects the need for certainty for how Southern Water will comply with its duty to meet water supply demand under the Water Industry Act 1991. Part 4 of the Environmental Permitting (England and Wales) Regulations 2016 (the EP Regulations) provides for the enforcement and offences relating to environmental permits. Schedule 8 of the draft DCO [APP-023] makes no modification of Part 4 of the EP Regulations and therefore does not restrict or limit the Environment Agency's power to enforce a breach of environmental permit, affect the offences created, or modify the penalties and enforcement undertakings. The modification made by paragraph 25 of Schedule 8 of the draft DCO [APP-023] secures the permit for the discharge of the recycled water from unilateral revocation where there is no breach of that permit. This secures the sustainable supply of recycled water as a public water supply for as long as it is required, but in no way limits the action that the Environment Agency may take in the event the conditions of the permit were breached. It is also noted that, in light of the key principles for the abstraction licences being secured within the draft DCO [APP-023], the DCO examination provides an opportunity for the public and stakeholders to provide comments on the proposed conditions. In this context, further publication of the application for an abstraction licence and the opportunity for the public to provide comments on that application would duplicate the consultation and engagement achieved through the DCO examination process; additionally, as the provisions of Part 5 of Schedule 8 of the draft DCO [APP-023] must be incorporated into the licence, there would be no opportunity for responses to such a consultation to affect the form of licence.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-DCO-15	RR-018, RR-028, RR-128, RR-129, RR-354, AS-033	Concerns that Article 5 of the draft DCO confers on the Applicant powers to direct how Portsmouth Water operates and maintains its own reservoir and, in circumstances the Applicant itself may specify, to assume operational control of it.	Article 5 of the draft DCO [APP-023] provides a statutory right for the Applicant to use and enjoy the Havant Thicket Reservoir infrastructure, including the water stored in the reservoir. The provisions of this article are necessary to ensure that the DCO is capable of authorising the whole of the Project, of which the storage and draw down of water using the Havant Thicket Reservoir is an integral part. It is anticipated that commercial agreements between the Applicant and Portsmouth Water would regulate this interface. However, those agreements remain under negotiation (please refer to the joint statement at Appendix E to 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)). One of the key purposes of article 5 of the draft DCO [APP-023] is therefore to ensure there is in place an appropriate 'backstop' that would facilitate the operation of the Project in the unlikely event that those agreements are not concluded or, over the life of the Project, those agreements for whatever reason fail. As such a 'back stop' article 5 of the draft DCO [APP-023] makes provision for the operational interactions between the Project and the Havant Thicket Reservoir infrastructure, through the agreement of a scheme of operation or, in default of agreement, determination of the scheme of operation by the Secretary of State. The Applicant does not agree that Article 5 would enable the Applicant to assume operational control of the Reservoir; this would remain under the control of Portsmouth Water, notwithstanding that the Applicant would be permitted to take such action as is necessary to secure operation and maintenance in accordance with the scheme of operation.
RR-DCO-16	RR-018, RR-354	Concerns that Article 5(6) permits the Applicant to take such action as it considers appropriate if it considers the Havant Thicket Reservoir is not being operated in accordance with its directions, potentially preventing Portsmouth Water from maintaining seasonally fluctuating water levels committed to for biodiversity.	Please see the Applicant's response to RR-DCO-15.
RR-DCO-17	RR-018, RR-354	Concerns that Article 5(11) excludes Article 55 arbitration from Article 5 disputes, leaving no general dispute-resolution route where matters are in the Applicant's own determination.	Article 5(5) of the draft DCO [APP-023] confirms that any dispute in relation to a scheme of operation is to be referred to the Secretary of State for determination. Article 55 does not apply to disputes arising under article 5 to provide complete clarity that any dispute so arising must instead be determined by the Secretary of State. Disputes as to the Scheme of Operation, being the disputes that may arise under article 5, are not simply private disputes regarding contractual liabilities; they may require input from regulators and should be determined in the public interest. Given the national importance of a secure public water supply, it is considered appropriate that such matters are to be determined by the Secretary of State.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-DCO-18	RR-018, RR-129, RR-354, AS-033	Concerns that Article 9 permits transfer of the benefit of the draft DCO (including the powers over the Havant Thicket Reservoir) to a third party, potentially an unlicensed special-purpose vehicle or contractor.	Article 9 (consent to transfer benefit of Order) permits the transfer of the benefit of the DCO only with the consent of the Secretary of State. It therefore contains sufficient safeguards to ensure that the benefit of the Order is not transferred to an unsuitable person.
RR-DCO-19	RR-018, RR-354, AS-033	Concerns that Article 46(5) disapplies the Portsmouth and Portsea Waterworks Act 1809 and the Portsmouth Water Act 1941, with unclear effect on Portsmouth Water and its customers.	Those Acts are products of an era before modern regulation of the water industry and, to a significant degree, they have been superseded by the Water Industry Act 1991 and related provisions. Nonetheless, they remain on the statute book and so it is appropriate for them to be disapplied in order to remove any impediment to the delivery of a project of national significance and the import public benefits it would bring. It should be noted that the disapplication is narrowly drawn and applies "in so far those provisions still in force are incompatible with the exercise by the undertaker of the functions conferred by this Order".
RR-DCO-20	RR-028, RR-128, RR-153, RR-354	Concerns over the permanence of restrictions on Portsmouth Water, its customers and the regulators, with suggestions that these be addressed through flexible commercial agreements aligned to the operational life of the Water Recycling Plant, rather than embedded permanently in the draft DCO.	Please refer to the Applicant's response to RR-DCO-15.
RR-DCO-21	RR-018, RR-294	Concerns that the draft Statement of Common Ground with Portsmouth Water has not been provided, and the draft Statement of Common Ground with the Environment Agency records that the Agency is taking legal advice on Articles 5, 46 and Schedule 8 of the draft DCO.	The Applicant has been proactive in seeking to agree Statements of Common Grounds with parties prior to Examination wherever possible. The Applicant is continuing to engage with Portsmouth Water regarding a Statement of Common Ground and, once settled, this will be provided to the Examining Authority. The Applicant has been engaging with the Environment Agency throughout the pre-application stages of the Project and will continue to do so during Examination, including engaging with its legal advisors.
RR-DCO-22	RR-069, RR-095, RR-354	Concerns that the change to store recycled water in Havant Thicket Reservoir constitutes a material change to the existing planning permission that should require a separate planning application and Environmental Impact Assessment.	The DCO application is the mechanism for authorising the Project and its use of Havant Thicket Reservoir. The Environmental Statement accompanying the application assesses the likely significant effects of the Project. Article 5 of the draft DCO [APP-023] is an appropriate mechanism to address inconsistencies between the development consent sought by the Applicant and the terms of the existing (or future) planning permissions for the Havant Thicket Reservoir infrastructure.
RR-DCO-23	RR-354	Concerns that the repurposing of the Havant Thicket Reservoir is not clear or prominent in the description of the development but is embedded within Articles 5, 46 and Schedule 8 where it can be overlooked.	The Applicant's proposed use of the Havant Thicket Reservoir infrastructure is clearly described in ES Chapter 3 Description of the Proposed Development [APP-082] at paragraph 3.2.2 and shown in the Graphic 3-1 on page 8 and described at paragraphs 3.3.100 to 3.3.102 of that chapter. The use of the reservoir is also made clear on the Applicant's project page on its website and on the project information page of the Planning Inspectorate's webpages relating to this Project.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-DCO-24	RR-018, RR-306, RR-354	Concerns that the Project has been categorised misleadingly as a Dam or Reservoir when the reservoir itself is not part of the works to be authorised, and that a category such as 'Water Treatment' would have been more accurate.	The Applicant understands the respondents to be concerned with the manner in which the Planning Inspectorate has categorised the Project. This is something that is not in the control of the Applicant. The description of the Project is clear, however.
RR-DCO-25	RR-210	Concerns that bundling the cross country pipeline and the Water Recycling Plant under a single DCO via Associated Development mechanisms is a subversion of localised planning scrutiny.	The Project, including the water transfer pipelines, is the subject of a direction made by the Secretary of State under section 35 of the PA 2008 to be treated as development for which development consent is required. This is not a mechanism to avoid local planning scrutiny but an appropriate consenting route specifically purposed for dealing with large and complex major infrastructure of national significance such as the Project. Local planning authorities and other interested persons will have the opportunity to participate in the examination and scrutinise the Applicant's proposals. Local planning authorities, in particular, have played an important role throughout the pre-application period in shaping the Project.
RR-DCO-26	RR-077, RR-095	Concerns that the draft DCO would give the Applicant too much control and would strip local authorities of decision making powers.	The Applicant has prepared the draft DCO [APP-023] with care and considers that it strikes an appropriate balance. In this regard it should be noted that local planning authorities will continue to play important roles under the terms of the draft Order, if granted, including among other matters, determining whether to approve matters submitted pursuant to the requirements contained in Schedule 2 to the draft DCO [APP-023].
RR-DCO-27	RR-018, RR-122, RR-129, RR-192, RR-294, RR-354, AS-033	Suggestions that project specific independent controls, water quality standards, trigger levels and standards, bespoke monitoring and enforceable requirements should be secured by the draft DCO, rather than left to existing regulatory regimes or through a post-consent monitoring plan, and treated as a Principle Issue for examination.	See the Applicant's response to reference RR-DCO-28.
RR-DCO-28	RR-354	Suggestions that Schedule 2 of the draft DCO requirements should secure an independent expert panel audit of the Water Recycling Plant and a pre-commencement sewer catchment risk assessment and hazard control programme.	The Applicant notes these suggestions however it is the Applicant's position that these measures are in place. Paragraph 3.8.3 of the National Policy Statement for Water Resources Infrastructure confirms that the Secretary of State 'should work on the assumption that, in terms of the control and enforcement, the relevant pollution control or other consenting regime will be properly applied and enforced. Decisions under the PA 2008 should complement but not duplicate those taken under the relevant pollution control regime' [emphasis added]. Accordingly, it would not be appropriate for Schedule 2 to include any Requirement relating to the quality of the water to be discharged into the reservoir or the reporting of this as a duplication of the existing environmental permitting regimes. Please also refer to the Applicant's response to action point ISH1-06 in 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).

Reference	RR references	Summary of issue raised	The Applicant's response
			In addition, the Applicant has provided measures in relation to pollution risk during operation and an Emergency Response Plan within the Operational Environmental Management Plan [APP-422] as well as an Outline Water Monitoring Plan [APP-204] which contains parameters of monitoring and reporting relating to groundwater and surface water that will be agreed with stakeholders as required across the Project. Finally, the Applicant conducts risk-based catchment screening (including assessing each sewer catchment against indicators set out by Water UK) as part of the development of a Drainage and Wastewater Management Plan. The Applicant published its plan in May 2023, in accordance with guidance from Water UK, and will continue to develop these plans as required under the Environment Act 2021.
RR-DCO-29	RR-354	Suggestions that discharge from washouts should be secured as a requirement of the draft DCO rather than left as a statement of intent.	The Applicant has provided for washout maintenance measures within the Operational Environmental Management Plan [APP-422], this includes the testing and routine maintenance of washout valves during operation which may require the release of source water and will be collected by tanker. The Operational Environmental Management Plan [APP-422] is secured by Requirement 13 of the draft DCO [APP-023] meaning that the washout maintenance measures are secured by Requirement and not a statement of intent.
RR-DCO-30	RR-354	Concerns that the flexibility and optionality sought by the Applicant across the draft DCO is too broad, including in relation to abstraction, control of the reservoir and reductions in regulators' enforcement powers, and is not bounded by the maximum parameters assessed in the Environmental Statement.	Havant Thicket Reservoir forms a critical part of the Project and the principle of its use for that purpose is supported by water industry regulators. It is therefore essential that the DCO makes provision for the operational interactions with the reservoir infrastructure to ensure that there is no impediment to the delivery of the Project in the event agreement cannot be reached or is unable to be enforced for any reason. Schedule 8 of the draft DCO [APP-023] secures for each party abstraction volumes that reflect the negotiated contractual position. Please refer to the joint statement at Appendix E to 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 further information. Portsmouth Water is contractually entitled to take up to 25 Ml/d from Havant Thicket Reservoir, which acts as compensation water for water that Portsmouth Water provides to Southern Water at Gaters Mill. It should be noted that Havant Thicket Reservoir is funded by Southern Water customers to meet Southern Water's supply requirements, both through providing up to 25Ml/d of compensation water to Portsmouth Water, and through the storage of water, including recycled water, as part of the Project. In order to ensure that the water need identified by Southern Water is available for abstraction when needed, Schedule 8 is drafted to reflect and enable the underlying contractual arrangements to be carried out, including that Southern Water has an unfettered right to the water in the reservoir. Any abstraction licence for

Reference	RR references	Summary of issue raised	The Applicant's response
			more than 25Ml/d could not be utilised by Portsmouth Water under the contractual arrangements relating to Havant Thicket Reservoir. Part 4 of the Environmental Permitting (England and Wales) Regulations 2016 (the EP Regulations) provides for the enforcement and offences relating to environmental permits. Schedule 8 makes no modification of Part 4 of the EP Regulations and therefore does not restrict or limit the Environment Agency's power to enforce a breach of environmental permit, affect the offences created, or modify the penalties and enforcement undertakings. Regulation 37 provides that the Environment Agency may suspend an environmental permit by serving a suspension notice on the operator. The effect of such a notice is that the environmental permit ceases to have effect to the extent stated in the notice, until the notice is withdrawn (Regulation 37(10). The modification made by paragraph 25 of Schedule 8 secures the permit for the discharge of the recycled water from unilateral revocation where there is no breach of that permit. This secures the sustainable supply of recycled water as a public water supply for as long as it is required, but in no way limits the action that the Environment Agency may take in the event the conditions of the permit were breached. The provisions within the draft DCO [APP-023] operate to enable and facilitate the public benefits of the Project to be realised and ensure that the Project is capable of delivering the identified water supply need.
RR-DCO-31	RR-354	Suggestions that a quantified carbon budget, mitigation targets and reporting obligation should be secured as requirements in the draft DCO rather than left to later Carbon Management Plan iterations.	The Outline Carbon Management Plan [APP-423] is secured by Requirement 12 of the draft DCO [APP-023]. It defines the Project's carbon strategic objectives and establishes a mechanism through future Carbon Management Plans for the monitoring and reporting on the progress of mitigation measures that will be implemented to reduce emissions.
RR-DCO-32	RR-018, RR-153, RR-192, RR-293, RR-354	Statements that additional matters relating to the draft DCO should be examined and that the Applicant's Potential Main Issues for Examination should not be treated as exhaustive.	The Applicant's Potential Main Issues for Examination [APP-058] has been prepared to assist the Examining Authority in understanding residual issues and enable for a more robust preparation for examination. It is not intended to be exhaustive and the Examining Authority will examine the application as it considers to be appropriate.
RR-DCO-33	RR-354, AS-033	Concerns that the Statement of Common Ground with Portsmouth Water is missing from the Examination Library and its disclosure is required.	The Applicant has been proactive in seeking to agree Statements of Common Grounds with parties prior to Examination wherever possible. The Applicant is continuing to engage with Portsmouth Water regarding a Statement of Common Ground and, once settled, this will be provided to the Examining Authority.
RR-DCO-34	RR-294, AS-033	Suggestions that the safeguards on which the Applicant relies should be effectively secured by enforceable requirements in the draft DCO.	Where the Applicant has proposed measures to safeguard the environment and mitigate impacts resulting from the Project, these safeguards have been provided in the management plans that are secured in Schedule 2 to the draft DCO [APP-023] and are therefore enforceable.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-DCO-35	RR-266, AS-033	Suggestion that the draft DCO should secure Portsmouth Water's enforceable and right to refuse recycled water entering Havant Thicket Reservoir where water quality or ecological requirements are not met, during drought as well as normal operation.	The output of the Water Recycling Plant will be subject to an environmental permit, including during commissioning. Any risks associated with the discharge of recycled water are therefore already appropriately controlled by the environmental permitting regime. Paragraph 3.8.3 of the National Policy Statement for Water Resources Infrastructure confirms that the Secretary of State 'should work on the assumption that, in terms of the control and enforcement, the relevant pollution control or other consenting regime will be properly applied and enforced. Decisions under the PA 2008 should complement *but not duplicate* those taken under the relevant pollution control regime' (emphasis added). Accordingly, it would not be appropriate for Schedule 2 to include any Requirement relating to the quality of the water to be discharged into the reservoir. Please also refer to Action Point ISH1-06 in 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 further information on the relationship between the DCO and existing regulatory regimes. The Applicant has therefore not sought to secure matters that are already subject to an applicable regulatory regime within the draft DCO [APP-023], and does not consider that there is any justification for alternative water quality triggers or parameters to be specified within the draft DCO [APP-023] as this would amount to such a duplication. Operational considerations related to matters such as the flow rate of water from the water recycling plant is a matter for the scheme of operation to be agreed or determined under article 5 of the draft DCO [APP-023].
RR-DCO-36	AS-033	Concerns over the Applicant's late or absent disclosure of reservoir related provisions, including Schedule 8, to Portsmouth Water and the Environment Agency prior to application submission, and the recording of Portsmouth Water's assets and consents as agreed in Statements of Common Ground with third parties to which Portsmouth Water is not party.	The Applicant notes this comment. The Applicant has engaged extensively with both Portsmouth Water and the Environment Agency in the pre-application period. The Applicant also confirms that a number of Statements of Common Ground reference that Portsmouth Water is the owner and operator of the Havant Thicket Reservoir.
RR-DCO-37	AS-033	Concern that the Environment Agency's discharge permit for recycled water to Havant Thicket Reservoir will not be in place when the DCO is decided.	Please refer to RR-DCO-06. The Statement of Common Ground with the Environment Agency [AS-019] confirms that the Environment Agency is satisfied that, whilst the discharge permit application will be made subsequent to the DCO application, the pre-application work and discussions with the Applicant have not identified any issues that would indicate that a permit for discharge of water from the Water Recycling Plant into Havant Thicket Reservoir cannot be granted. Please also refer to Action Point ISH1-06 in 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 further information on the relationship between the DCO and existing regulatory regimes.

Table 2-35 Summary of issues raised on the theme of the process of developing the Project and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-PDP-01	RR-002, RR-212	Concerns that the facts, figures, forecasts and assumptions put forward by the Applicant regarding the Project have not been assessed by an independent peer group outside of Government Agencies.	Independent peer review and assessment of information about the Project is not a pre-requisite to progress through the planning process. The Applicant undertook four stages of statutory public consultation during the pre-application stage and has had regard to all feedback in developing the Project. The Applicant has also undertaken public consultation on its previous Water Resource Management Plan 2019 (WRMP19) and its emerging Water Resource Management Plan 2024 (WRMP24). The Applicant's Development Consent Order (DCO) application will be independently examined under the Planning Act 2008 by an Examining Authority (ExA) appointed by the Planning Inspectorate (the Inspectorate) on behalf of the Secretary of State. The examination is a six-month process during which the ExA will assess the application, ask questions and hold hearings if there are issues that need to be discussed in detail. Interested parties are able to have their say during the examination including official bodies, local planning authorities and members of the public.
RR-PDP-02	RR-018, RR-294, AS-033	Requests that the Examining Authority does not treat the Applicant's Potential Main Issues for Examination as exhaustive and examines additional Principal Issues raised by Interested Parties.	The Applicant has noted these comments. The Applicant notes that the Examining Authority has subsequently published its Initial Assessment of Principal Issues (Annex C to the Rule 6 letter [PD-005]), which identifies the principal issues to be considered during the examination. The Examining Authority notes in the Rule 6 Letter that the Initial Assessment of Principal Issues is not a comprehensive or exclusive list of the issues that will be subject to examination. The Applicant will engage with all matters examined by the Examining Authority.
RR-PDP-03	RR-018, RR-294, AS-033	Concerns that documents relied upon by the Applicant, in particular the draft Principal Areas of Disagreement Summary Statements and the draft Statement of Common Ground with Portsmouth Water, are not available in the Examination Library despite being repeatedly referenced by the Applicant, and that these should be disclosed immediately.	Principal Areas of Disagreement Summary Statements are documents that can be produced by interested parties. All parties with Statements of Common Ground confirmed during pre-application engagement that they did not wish or intend to produce Principal Areas of Disagreement Summary Statements. The Applicant confirms that the draft Statement of Common Ground (SoCG) with Portsmouth Water will be submitted at Examination Deadline 2.
RR-PDP-04	RR-018, RR-306	Statements of Interested Party registration, personal or organisational status, and intention to participate in the Examination both in writing and at Issue Specific Hearings.	The Applicant has noted these comments.
RR-PDP-05	RR-018, RR-294	Statements clarifying terminology used by Interested Parties, including the use of 'recycled effluent' in place of the Applicant's term 'recycled water' and 'reject water' for the concentrated waste stream.	The Applicant has noted these comments. The DCO application includes an Application Glossary [APP-007], which defines the terminology used within the application documents. The Applicant considers that the glossary provides the appropriate basis for understanding the terminology adopted within the application. Where Interested Parties use alternative terminology, they may wish to provide definitions where necessary to ensure clarity.

Reference	RR references	Summary of issue raised	The Applicant's response
			Please also refer to Appendix C 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).
RR-PDP-06	RR-018	Concerns that the Project has been misleadingly classified under the Dams and Reservoirs category when it comprises a Water Recycling Plant, pipelines and pumping stations, and should instead have been classified as a Wastewater Treatment and Transfer scheme.	This classification of the scheme relates to the Planning Inspectorate's Project webpage and is under the control of the Planning Inspectorate. The Project webpage provides a clear description of the Project and therefore there should be no ambiguity about what is proposed.
RR-PDP-07	RR-223	Observation that a previous 2023 plan by the Applicant was rejected by DEFRA and that the current proposal is essentially the same.	This comment relates to the Water Resources Management Plan (WRMP) process and is not of relevance to the determination of the DCO application.
RR-PDP-08	RR-300	Concerns that the Project is being progressed too quickly and without sufficient time for proper explanation, consultation and in-depth examination.	The Project is proceeding under the conventional timescales set out in the Planning Act 2008. The DCO process is required due to the nature and scale of the Project and its designation as a Project of National Significance. The Applicant has undertaken detailed investigations, assessments and surveys to develop the DCO application, as is required by policy and legislation. The Applicant is expediting delivery timescales wherever possible in order to enable the regulatory delivery date of 2034 to be met, as set out in the Applicant's emerging Resource Management Plan 2024 (WRMP24). The Applicant has developed and improved the proposals in readiness for the DCO application over a period of time that is typically considered longer than other projects following the DCO process owing to the number of consultations undertaken to support the Project's iterative development.
RR-PDP-09	RR-300	Concerns that the Applicant has bypassed the local council by applying to the Secretary of State, preventing local residents from having a say.	The DCO process was selected for the Project as it was considered most suited to dealing with the nature and scale of the Project and the powers and consents required for its delivery, noting that the alternative would have required planning applications to be submitted to circa seven host authorities. The Applicant's pre-application stage has included numerous stages of pre-application consultation, ensuring that residents and all other interested parties have had ample opportunities to have their say.
RR-PDP-10	RR-331, RR-354	Requests that the Examining Authority scrutinises structural, geological, environmental and operational matters, including flexibility, optionality and control of operational impacts, in detail.	The Applicant has noted these comments.
RR-PDP-11	AS-033	Concerns that the Applicant's Potential Main Issues for Examination document misrepresents the state of agreement with Portsmouth Water on the Havant Thicket Reservoir interface, including by rating it 'high agreement' when Portsmouth Water's Relevant Representation shows substantive disagreement.	The Applicant has noted these comments. The Applicant confirms that a draft Statement of Common Ground with Portsmouth Water will be submitted at Examination Deadline 2.

Table 2-36 Summary of issues raised on the theme of the water recycling process and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-WRPR-01	RR-009, RR-095, RR-111, RR-145, RR-150, RR-164, RR-170, RR-266, RR-352	Concerns that reverse osmosis and advanced water recycling technology are unproven at this scale for public water supply in the UK.	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 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 treated wastewater. 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). 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.
RR-WRPR-02	RR-014, RR-018, RR-124, RR-168, RR-266, RR-287, RR-288, RR-354	Comments on the use of the proposed treatment process (reverse osmosis, UV and micro-filtration) and the extent to which international precedents (Orange County, Singapore, Australia) are comparable to the Project.	Please refer to the Applicant's response to RR-WRPR-01. The Applicant has adopted a globally acceptable and proven process, with over 40 years operational record in the United States, Singapore and Australia, to produce high-quality recycled water. The Full Advanced Treatment process comprises micro-filtration and reverse osmosis membranes and an ultraviolet advanced oxidation and disinfection process UVAOP to remove chemicals and biological contaminants from treated wastewater. In addition, the treatment process proposed for the Project goes beyond those employed at the referenced schemes in the United States, Singapore and Australia, through the inclusion of an additional Granular Activated Carbon (GAC) adsorption treatment stage following reverse osmosis. GAC is a widely used treatment process in UK water treatment including at Otterbourne Water Supply Works. For the WRP, GAC is included to provide an adsorptive mop-up stage for the retention of low levels of residual organic compounds (and transformation products) post-UVAOP. For further information on the water recycling process, please refer to Graphic 3-17 in ES Chapter 3 Description of the Proposed Development [APP-082].

Reference	RR references	Summary of issue raised	The Applicant's response
RR-WRPR-03	RR-003, RR-009, RR-018, RR-028, RR-036, RR-058, RR-084, RR-085, RR-095, RR-107, RR-129, RR-153, RR-154, RR-157, RR-172, RR-176, RR-177, RR-206, RR-208, RR-242, RR-262, RR-288, RR-300, RR-330, RR-352, RR-354, RR-355	Concerns that the treatment process cannot fully remove contaminants of concern, including PFAS 'forever chemicals', pharmaceuticals, endocrine disruptors, microplastics, trace organics and treatment by-products.	As stated in section 19.8 of Environmental Statement (ES) Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1), the Applicant has undertaken an extensive programme of monitoring of a wide range of Contaminants of Emerging Concern (CECs) in the final treated wastewater from Budds Farm Wastewater Treatment Works (Budds Farm WTW) (e.g. a representation of influent water quality to the Water Recycling Plant (WRP)) and water treated in its pilot treatment plant at Budds Farm WTW. This considered a wide range of substances, including: • Pharmaceuticals and personal care products (PPCPs): Organic contaminants sourced from pharmaceutical products and their metabolites, cosmetics, soaps and shampoos, which can be found in trace levels in wastewater. • Industrial chemicals: Substances such as per- and poly-fluoroalkyl substances (PFAS), polycyclic aromatic hydrocarbons (PAHs), volatile organic compounds (VOCs) and inorganic contaminants (including some trace metals). Although some specific compounds within these broad categories of chemicals have an established Environmental Quality Standard (EQS) (including some metals, PAHs and several PFAS compounds, this is not the case for the majority of these substances. • Agricultural chemicals: Substances such as pesticides and fertilizers that can be found in surface water runoff. The pilot plant included a Full Advanced Treatment process, comprising integrated membranes followed by an ultraviolet and advanced oxidation process. Although this does not include the Granular Activated Carbon (GAC) and remineralisation processes that will be present within the Applicant's WRP, the pilot plant included the multi-barrier treatment process that will be primarily responsible for the effective removal of contaminants from the treated wastewater. As some contaminants would also be removed by the GAC process, the results from the pilot plant therefore represent an underestimate of the performance of the full WRP and are therefore considered to be the worst case. The results of the pilot plant investigation are described in an independent review produced by the University of Brighton (Mayor-Smith (2024) [1], as referenced in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1). The results of the investigation into pilot plant performance indicate that the Full Advanced Treatment process resulted in a considerable increase in water quality, with the concentration of CECs decreasing after passing through the pilot plant. Over 60% of the CECs measured in the WRP influent decreased to below the limits of detection in the water that had passed through the WRP, with the largest reductions identified for a range of pharmaceuticals, personal care products and pesticides. The results of the pilot study clearly demonstrate that CEC concentrations in the recycled water are considerably lower than those in the treated wastewater from Budds Farm WTW that is currently released under a permitted discharge

Reference	RR references	Summary of issue raised	The Applicant's response
			into the Solent via the Eastney Long Sea Outfall (LSO). This suggests that releases from the WRP into Havant Thicket Reservoir and downstream water bodies (Riders Lane Stream, Hermitage Stream, Langstone Harbour) are unlikely to contain the full suite of CECs measured by the Applicant or independently recorded in Langstone Harbour [2] [3] and that any CECs remaining in the WRP output would be present in extremely low concentrations. Significant adverse effects on water quality and biota from CECs are considered unlikely, particularly given that the pilot plant data does not represent the full treatment process that would be in place at the WRP (which would also include a GAC treatment stage that would also remove contaminants from the recycled water).
RR-WRPR-04	RR-009, RR-018, RR-084, RR-095, RR-129, RR-153, RR-206, RR-262, RR-288, RR-300, RR-354	Concerns regarding long-term and cumulative exposure to residual contaminants in recycled water, and the resulting increase in background exposure of the population supplied.	The WRP produces purified recycled water which is then discharged into Havant Thicket Reservoir. The output of the WRP will be controlled by an environmental permit, controlling the quality of the water that may be discharged into the environment. 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-WRPR-05	RR-018, RR-084, RR-129, RR-248, RR-288, RR-354	Concerns regarding the persistence and bioaccumulation of PFAS and other emerging contaminants, including accumulation within the Havant Thicket Reservoir, sediment and downstream drinking water systems, and the absence of established UK standards for these substances.	The Applicant acknowledges that there are currently no Environmental Quality Standards (EQSs) for the majority of per- and polyfluoroalkyl substances (PFAS), with the exception of perfluorooctane sulfonic acid (PFOS), which has an EQS under the Water Framework Directive (Standards and Classification) Directions (England and Wales) 2015, or for other Contaminants of Emerging Concern (CECs). However, whilst the concerns raised are noted, they are beyond the scope of the DCO Examination process. The Environment Agency is the regulatory body responsible for the control of any discharge of potentially polluting substances into the environment. The water quality of the output from the water recycling plant will be controlled by and managed in accordance with the environmental permit. It is not the role of the DCO to speculate about how such substances will be regulated in the future. The Applicant will comply with the conditions of the environmental permit, ensuring that the recycled water does not cause harm to the environment.

Reference	RR references	Summary of issue raised	The Applicant's response
			For further information about how the environmental permitting process will operate in relation to the Project, please refer Appendix D and to Appendix F of 8 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). Please refer to RR-WRPR-03 for further information about the effectiveness of the water recycling process at removing contaminants. As explained in RR-WRPR-04, after the water is abstracted from Havant Thicket Reservoir, it will undergo a final stage of treatment at Otterbourne Water Supply Works to ensure the water meets the high water quality standards required by the Drinking Water Inspectorate.
RR-WRPR-06	RR-018, RR-084, RR-129, RR-153, RR-266, RR-288, RR-354, RR-355	Concerns regarding the adequacy of pilot plant trials at Budds Farm, including the range of contaminants tested, sample numbers, and the transparency of monitoring data.	The Applicant's pilot plant trial at Budds Farm WTW considered a wide range of substances, including numerous pharmaceuticals and personal care products (PPCP), industrial chemicals such as per- and poly-fluoroalkyl substances (PFAS), polycyclic aromatic hydrocarbons (PAHs), volatile organic compounds (VOCs), inorganic contaminants, pesticides and fertilizers. The Applicant's monitoring included a range of potential CECs, with more than 400 substances selected to reflect global best practice for the development of water recycling schemes and risks identified from numerous trade licences in the catchment that contributes wastewater to Budds Farm WTW. The results of the pilot plant investigation are described in an independent review produced by the University of Brighton (Mayor-Smith (2024) [1], as referenced in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1). Please refer to the Applicant's response to RR-WRPR-03 for further information.
RR-WRPR-07	RR-036, RR-129, RR-354	Concerns that granular activated carbon (GAC) treatment will not reliably remove all contaminants passing through reverse osmosis, and that GAC performance data has not been provided.	The pilot plant included a Full Advanced Treatment process, comprising integrated membranes followed by an ultraviolet and advanced oxidation process, but did not include the granular activated carbon (GAC) and remineralisation processes that will be present within the WRP. The efficacy of the pilot plant is set out in detail in RR-WRPR-03. The WRP will include the additional step of using GAC. GAC is a common treatment stage in UK water treatment due to its adsorptive characteristics for micropollutants and will be included in the full-scale WRP as an additional barrier to capture residual contaminants. Because some contaminants would also be removed by the GAC process, the results from the pilot plant therefore represent an underestimate of the performance of the full-scale WRP and are considered to be the worst case. Further information can be found in an independent review of the recycling pilot plant performance produced by the University of Brighton (Mayor-Smith, 2024) [1]. The output from the WRP will be subject to a discharge permit, ensuring its quality.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-WRPR-08	RR-018, RR-129, RR-354, RR-355	Concerns that hazards in the sewer catchment feeding Budds Farm WTW have not been risk-assessed or controlled at source, unlike international recycling schemes.	The Applicant operated a pilot plant to understand the efficacy of the Full Advanced Treatment process in treating final effluent from the proposed source, Budds Farm WTW. The testing undertaken at the pilot plant provided the basis for the water quality assessments and is being utilised to inform the pre-application with the Environment Agency for the environmental permit to control the output from the WRP. The Applicant is aware of international practice in relation to catchment management, however this is beyond the scope of the DCO Application. The evidence from the pilot plant shows that Full Advanced Treatment is effective at removing contaminants. This, combined with the environmental permit that will control the quality of the recycled water discharged into the reservoir, and the regulation of the final water quality after it has been further treated at Otterbourne Water Supply Works, ensures that the quality of water supplied to customers will be maintained.
RR-WRPR-09	RR-018, RR-129, RR-150, RR-153, RR-159, RR-266, RR-294, RR-300, RR-325, RR-354, AS-033	Suggestions that independent expert audit, monitoring and scrutiny of the WRP, together with preventative maintenance, inspection, reporting and equipment availability requirements, should be legally secured, reflecting practice in other countries using water recycling.	The development of the Project has included input from specialists who have worked on or collaborated with others on well-established international schemes, ensuring that best practice has been embedded throughout the design and development of the Project. The discharge from the WRP will be subject to regulation by the Environment Agency, while drinking water quality and the introduction of a new source of supply will be subject to the applicable Drinking Water Inspectorate requirements. Paragraph 3.8.3 of the National Policy Statement for Water Resources Infrastructure confirms that the Secretary of State 'should work on the assumption that, in terms of the control and enforcement, the relevant pollution control or other consenting regime will be properly applied and enforced. Decisions under the Planning Act 2008 should complement but not duplicate those taken under the relevant pollution control regime'. Accordingly, these matters are already legally secured, and it would not be appropriate for the draft DCO [APP-023] to include any Requirement relating to the quality of the water to be discharged into the reservoir or the reporting of this as a duplication of the existing environmental permitting regimes. Please also refer to the Applicant's response to action point ISH1-06 in 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).
RR-WRPR-10	RR-018, RR-288, RR-294, RR-325, RR-354	Concerns regarding the regulatory gap for water recycling in the UK, including the limited role of the Drinking Water Inspectorate and Environment Agency in overseeing the plant.	The Applicant notes the comment regarding the role of the Drinking Water Inspectorate (DWI) and Environment Agency in overseeing the plant. Water quality associated with the discharge from the WRP will be addressed through the relevant regulatory regime overseen by the Environment Agency, and it is not appropriate to duplicate that regime through the planning process. The DWI regulates the water quality of new sources of supply, through the requirements placed on the Applicant by the Water Supply (Water Quality) Regulations 2016, including Regulations 15, 27 and 28. These requirements will continue to apply in relation to Havant Thicket Reservoir, including once recycled water is utilised.

Reference	RR references	Summary of issue raised	The Applicant's response
			For further information, please refer to RR-LPP-02 and Appendix D and 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).
RR-WRPR-11	RR-036, RR-084, RR-129, RR-168, RR-206, RR-217, RR-266, RR-278, RR-290, RR-300, RR-354, RR-355	Concerns that operational, mechanical or human failures in the treatment process could result in inadequately treated water entering Havant Thicket Reservoir before detection.	The multi-stage water recycling process will feature numerous safeguards, including continuous monitoring of water quality at the inlet, interstage points and final discharge, together with continuous system performance measures using real-time sensors and automated controls, to ensure that, in the unlikely event that a significant deviation in water quality or process performance occurs, it can be quickly identified and rectified through partial or full system shutdowns or diversion. The Operational Environmental Management Plan [APP-422], secured by Requirement 13 in Schedule 2 to the draft DCO [APP-023], requires the preparation of an Emergency Response Plan to include emergency procedures for a range of failures and other emergency circumstances. It would not be possible for treated wastewater to bypass this process and enter Havant Thicket Reservoir. These safeguards would be implemented by the Contractor once appointed to construct and operate the WRP and would be a key specification for the plant to ensure water quality requirements would be met. As discussed above, including at RR-WRPR-09, the output of the water recycling plant is subject to an environmental permit that the Applicant must comply with. Together, the design and regulatory safeguards will ensure the quality of the recycled water entering the Havant Thicket Reservoir.
RR-WRPR-12	RR-036, RR-084, RR-129, RR-168, RR-354	Suggestions that failure-response protocols (automatic shutdown, reservoir isolation, pipeline procedures, independent restart confirmation and regulator notification) should be legally secured.	ES Chapter 14 Major accidents and disasters [APP-093] identifies a range of measures, including remote monitoring and control systems, emergency power provision, continuous staffing of the WRP and emergency response procedures, which are intended to reduce risks to as low as reasonably practicable. These measures are secured through the Operational Environmental Management Plan [APP-422], which is secured by Requirement 13 in Schedule 2 to the draft DCO [APP-023]. The OEMP requires the preparation of an Emergency Response Plan to include emergency procedures for a range of failures and other emergency circumstances. The emergency procedures are therefore legally secured through the DCO.
RR-WRPR-13	RR-084, RR-129, RR-266, RR-354, RR-355	Concerns that reliance on end-point monitoring and sampling of recycled water, given laboratory turnaround delays, is insufficient to prevent contamination of the Havant Thicket Reservoir.	Please refer to the Applicant's response to RR-WRPR-11.
RR-WRPR-14	RR-018, RR-084, RR-206, RR-248, RR-288, RR-355	Suggestions that the precautionary principle should apply and that the Applicant should demonstrate safety under normal, abnormal and credible failure conditions before consent is granted.	The Applicant has considered a range of scenarios covering normal, abnormal and credible failure conditions, as assessed in ES Chapter 14 Major accidents and disasters [APP-093]. The Operational Environmental Management Plan [APP-422] requires the development of an Emergency Response Plan which

Reference	RR references	Summary of issue raised	The Applicant's response
			will include a suite of Incident Management procedures covering system failures. All the pumps and equipment in the pumping stations at the WRP site will be equipped with flow, level, and remote water quality monitoring and control which will centrally alarm if there were to be a deviation or system failure. While the system will be fail-safe, the WRP site will be operational and attended by operatives 24 hours a day. Further information about the measures incorporated into the design of the WRP to manage abnormal conditions are set out in ES Chapter 3 Description of the Proposed Development [APP-082].
RR-WRPR-15	RR-018, RR-084, RR-129, RR-288, RR-354	Concerns regarding the discharge of concentrated reject water containing PFAS and other contaminants via the Eastney Long Sea Outfall and its impact on the marine environment.	Water quality modelling and assessment, informed by the H1 assessment methodology and currently regulated Environmental Quality Standards (EQSs), has demonstrated that there would be no significant changes between the existing discharge at the Eastney Long Sea Outfall (LSO) and the proposed combined discharge, which would include reject water from the WRP. The results are presented in ES Appendix 19.5 Eastney Long Sea Outfall Solent dispersion modelling [APP-200]. The modelling demonstrates that there would be no change to the existing effect of the Eastney LSO on the Solent and adjoining water bodies, including Langstone Harbour. The Applicant's pilot plant data have been compared with the Uhlhorn et al. (2025) [3] PPCP dataset and the Ford and Ginley (2024) [2] PFAS dataset. The concentrations of analytes from the pilot plant were all significantly lower than the equivalent data from the Uhlhorn et al. (2025) and Ford and Ginley (2024) studies, reflecting the effectiveness of the water recycling process in removing most Contaminants of Emerging Concern (CECs). It should also be noted that the discharge of reject water through the Eastney LSO will be controlled by an environmental permit. Please refer to RR-WRPR-05 for further information about the role of environmental permits.
RR-WRPR-16	RR-018, RR-248, RR-288, RR-354	Suggestions that the scheme should be required to meet more protective international standards (such as US EPA limits) for PFOA and PFOS rather than current UK guidance alone.	The Applicant notes this comment. The Environment Agency is the regulatory body responsible for the control of any discharge of potentially polluting substances into the environment. The output from the WRP will be controlled by and managed in accordance with the environmental permit.It is not the role of the DCO to speculate about how such substances will be regulated in the future. Additionally, paragraph 3.8.3 of the National Policy Statement for Water Resources Infrastructure confirms "*decisions under the Planning Act should complement but not duplicate those taken under the relevant pollution control regime*" (emphasis added). The Applicant will comply with the conditions of the environmental permit, including any updates that may occur over time to reflect changing regulatory standards. For further information about the relationship between the DCO and these regulatory regimes, please refer to Appendix D and 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).

Reference	RR references	Summary of issue raised	The Applicant's response
RR-WRPR-17	RR-354	Concerns regarding the remineralisation of recycled water and its potential to alter the geochemistry of Havant Thicket Reservoir and downstream pipes.	Remineralisation is an essential part of the water recycling treatment process to add essential minerals back into the water. This will protect downstream infrastructure and ensure that the overall water quality characteristics and health benefits of the source water transferred to and stored in Havant Thicket Reservoir is not significantly different from the current water quality profile of water treated at Otterbourne Water Supply Works (Otterbourne WSW) prior to supply. The Applicant acknowledges that, as described in Tables 4.3 to 4.7 and 4.10 of ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1), there are differences in the chemistry of the source spring water and recycled water. As well as being less alkaline, the recycled water is predicted to contain lower concentrations of total phosphorus, nitrate, calcium, sulphate and dissolved organic carbon (DOC) than the spring water. Other parameters, including ammonium, sodium, chloride, iron and manganese, are similar. The assessment presented in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) demonstrates that the introduction of recycled water into Havant Thicket Reservoir would result in a small improvement in water quality, reflecting the reductions in parameters such as phosphorus, nitrate and DOC described above. The assessment concludes that the treatment measures incorporated into the design of the WRP, including the High Rejection Rate Membrane (HRRM) as an established technology for phosphorus removal, would be sufficient to prevent significant adverse effects on water quality in the reservoir. The release of recycled water into Havant Thicket Reservoir and reject water from the WRP through the Eastney Long Sea Outfall would be subject to an environmental permit, issued by the Environment Agency. The environmental permit would specify the strict requirements necessary to prevent potential impacts on the environment and achieve water quality standards.
RR-WRPR-18	RR-321, RR-354	Concerns regarding the high energy demand, chemical use and carbon footprint of the reverse osmosis treatment process.	The Project was selected as the preferred solution from an extensive options appraisal process, which considered a number of alternative options against a range of criteria, including environmental impacts and cost. Water recycling is less energy-intensive and costly than alternatives that provide a comparable scale of water supply, such as desalination, and was determined to be the best-value solution as part of the Applicant's Water Resources Management Plan (WRMP) and options appraisal processes. Project costs, carbon emissions, energy usage, environmental impacts and affordability have been key factors in the Applicant's assessment and consideration of alternative solutions. The alternative options considered are set out in ES Chapter 4 Consideration of alternatives [APP-083]. Furthermore, the detailed design of the Project will include measures to reduce carbon emissions across the whole lifecycle as far as reasonably practicable. This is set out in the Outline Carbon Management Plan (Outline CMP) [APP-423], and secured by Requirement 12 in Schedule 2 to the draft DCO [APP-023]. Carbon

Reference	RR references	Summary of issue raised	The Applicant's response
			emissions from energy consumption during operation of the Project have been quantified in ES Chapter 10 Carbon and climate change [APP-089]. Further mitigation measures are included in the Outline CMP [APP-423]. Regarding energy use, the majority of energy used by the Project is anticipated to be sourced from the National Grid, which is expected to decarbonise over time in line with Government policy. Renewable energy opportunities, including opportunities for on-site generation, have been considered during the development of the Project. The Applicant's approach to renewable energy is set out in Section 5.3 of the Outline CMP [APP-423]. The Outline CMP establishes the Project's approach to managing construction and operational carbon emissions and is aligned with the principles of PAS 2080. The Applicant considers that decisions relating to renewable energy generation and low-carbon energy supply are most effectively considered through its wider energy management strategy. This enables renewable energy generation and procurement opportunities to be assessed across the broader asset portfolio, allowing investment to be directed towards solutions that deliver the greatest long-term cost and carbon reduction benefit. The Applicant therefore considers that a strategic, portfolio-based approach is better placed to secure reliable, scalable and resilient low-carbon energy supplies than project-specific renewable installations alone. The Applicant is continuing to evaluate opportunities for the optimal decarbonisation of the Project's energy supply. The Outline CMP requires a renewable energy strategy to be developed, and this will be embedded into the procurement process as part of the second iteration of the CMP (see Table 1-1 in the Outline CMP). The second iteration of the CMP will be prepared in accordance with the DCO requirements and after the Contractor is appointed.
RR-WRPR-19	RR-354	Concerns regarding the management and disposal of sludge produced by the water recycling plant treatment processes.	The proposed treatment process at the WRP does not produce a solid stream and sludge management would not be required. As set out in paragraph 3.3.9 of ES Chapter 3 Description of the Proposed Development [APP-082], process waste, generated by the WRP process but separate from reject water released via the Eastney LSO, and welfare facility waste from the WRP site will be pumped to the existing sewer network for return to Budds Farm WTW. Reject water from the WRP does not require further treatment at Budds Farm WTW prior to release via the existing Eastney Long Sea Outfall. Please also refer to the Applicant's response to RR-WRPR-15 for additional information.
RR-WRPR-20	RR-354	Concerns regarding the variability of final effluent quality from Budds Farm WTW, particularly during storm events, and its impact on the performance of the recycling plant.	The Applicant carried out a pilot plant trial that included a Full Advanced Treatment process and used the treated wastewater at Budds Farm WTW as its source. The pilot plant demonstrated the performance of the Full Advanced Treatment process on the treatment of the source material, and represents a reasonable worst case assessment given the Water Recycling Plant will additionally include treatment with Granular Activated Carbon. In order to ensure the quality of the recycled water, even if there is variability in the output

Reference	RR references	Summary of issue raised	The Applicant's response
			from Budds Farm WTW, the multi-stage water recycling process would feature numerous safeguards, including continuous monitoring of water quality at the inlet, interstage points and final discharge, together with system performance using real-time sensors and automated controls. These ensure that, in the unlikely event that a significant deviation in expected water quality occurs, it can be quickly identified and rectified through partial or full system shutdowns or diversion. The final output of recycled water must comply with the environmental permit, issued by the Environment Agency. Accordingly, changes to the quality of the final effluent will be managed to ensure that, at all times, the output water quality meets or exceeds the required standards. During storm events, treated wastewater flows from Budds Farm WTW would continue to meet the necessary standards so this would not impact on the performance of the WRP.
RR-WRPR-21	RR-018, RR-192, RR-294, RR-354	Concerns that decisions made on this Project will set a precedent for the wider programme of six water recycling schemes planned in the South East.	The DCO Application relates only to the Project. Any other water recycling projects will be subject to their own planning applications and will need to demonstrate compliance with the relevant legal, regulatory and policy requirements in their own right.
RR-WRPR-22	RR-125, RR-155, RR-166, RR-169, RR-174, RR-176, RR-214, RR-234, RR-264, RR-300, RR-326, RR-329, RR-334, RR-335, RR-344	Concerns regarding the general health, safety and environmental impacts of introducing recycled wastewater into public drinking water supply.	Water recycling is a well-established and internationally proven technology, successfully implemented in countries such as the United States, Australia and Singapore. 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. In the UK, the DWI has confirmed that water recycling can be delivered safely, outlining the robust regulatory requirements that water companies must demonstrate before recycled water can be put into supply. Please refer to the letter from the DWI [PDA-038]. Please refer to RR-WRPR-04 for details for how the recycled water and, later, drinking water quality is regulated. Please also refer to RR-WRPR-03 for details of the efficacy of water recycling.
RR-WRPR-23	RR-084, RR-161, RR-355	Concerns that blending recycled wastewater with natural spring water in the Havant Thicket Reservoir places the existing spring-water resource at risk.	The Project will not put the existing spring water source at risk. Please refer to RR-WRPR-11 for an explanation of the safeguards built into the design of the Water Recycling Plant that ensure that recycled water is only discharged into Havant Thicket Reservoir if it meets the required standards. Pipelines will transfer the water from the WRP to Bedhampton Springs, where it will continue to be transferred through pipelines being constructed by Portsmouth Water to the reservoir. The connection at Bedhampton Springs will be designed to ensure that recycled water cannot directly enter the springs, for example through the inclusion of leak detection to automatically shut the pipeline system down in the event a leak starts. Please refer to ES Chapter 3 Description of the Proposed Development [APP-082], with relevant measures embedded into the design of the Project to avoid harm to the water

Reference	RR references	Summary of issue raised	The Applicant's response
			environment summarised in paragraph 19.4.1 of ES Chapter 19 Water Environment (Document reference 6.1, DCO Volume 6, Version 1). The effect of adding recycled water and blending this with spring water within Havant Thicket Reservoir has been modelled, with no significant effects identified from the introduction of recycled water. Further information is set out in RR-WQH-02.
RR-WRPR-24	RR-266	Suggestions that Portsmouth Water should have unilateral authority to stop recycled water entering Havant Thicket Reservoir where water quality or ecological conditions are unacceptable.	The Applicant has carried out extensive engagement with Portsmouth Water in relation to the Project, and is negotiating an agreement to include the operating protocols for how the Project and Havant Thicket Reservoir will operate. If no agreement is reached, a Scheme of Operation may be determined under article 5 of the draft DCO [APP-023]. It should, however, be noted that the quality of the discharge of recycled water into the reservoir will be subject to and controlled by an environmental permit, issued by the Environment Agency. Please refer to RR-WRPR-04 for more information.
RR-WRPR-25	RR-354	Concerns regarding the resilience and longevity of the Budds Farm WTW source and its suitability as a long-term input to the recycling plant.	Budds Farm WTW is an existing strategic wastewater treatment facility that serves a substantial and established catchment. The Project has been developed taking account of both current and forecast wastewater flows and population growth within the catchment area. As part of its Water Resources Management Plan 2024 (WRMP24), the Applicant has assessed the availability of treated effluent to support operation of the proposed WRP under a range of future scenarios, including changes in population and wastewater flows. The assessments demonstrate that sufficient recycled water would be available to support the proposed abstraction requirements throughout the design life of the Project and form part of the Applicant's long-term water resources planning process. Budds Farm WTW will continue to be operated, maintained and upgraded as necessary by the Applicant in accordance with regulatory requirements. The Project has therefore been designed on the basis of a robust and sustainable long-term source and the Applicant does not consider that there is evidence that the resilience, longevity or suitability of Budds Farm WTW would compromise the operation of the Water Recycling Plant over the lifetime of the Project.
RR-WRPR-26	RR-210, RR-301	Concerns regarding the necessity and rationale of transferring treated water to Havant Thicket Reservoir rather than discharging it to sea or using alternative disposal routes.	There is an increasing challenge of water scarcity, meaning that investment in new water supply options, alongside ambitious demand reduction, is needed in Hampshire and the Isle of Wight, the Applicant's Western Area Water Resource Zone, to enable secure and resilient supplies, support growth and protect the environment. Progressing options such as water recycling marks a transition to new water supplies that are less dependent on the uncertainties of rainfall, are well established elsewhere around the world and can support resilient supplies in a changing climate.

Reference	RR references	Summary of issue raised	The Applicant's response
			The Project will discharge recycled water into the reservoir where it will be blended with spring water and stored until it is required. It will then be abstracted for further treatment at Otterbourne Water Supply Works. The WRP also produces a reject stream. This reject stream is discharged to sea through the Eastney LSO. Both the recycled water and the reject stream will be controlled by an environmental permit. The process is explained in more detail in RR-WRPR-04.

Table 2-37 Summary of issues raised on the theme of traffic and transport and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-TTR-01	RR-040, RR-247	Concerns over the volume of construction traffic and HGV movements associated with the Project.	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 HGV movements in network peak hours. A Framework Construction Worker Travel Plan has also been prepared, Appendix A to the Framework CTMP [APP-415]. This includes measures to reduce the proportion of construction workers travelling to the construction compounds by car, including shuttle bus services. Environmental Statement (ES) Chapter 18 Traffic and transport [APP-097] includes an assessment of effects with regards to driver delay and did not identify any significant effects during the construction of the Project as a result of the forecast construction traffic impacts. The impacts of construction traffic on the local highway network are also assessed in ES Appendix 18.1 Transport Assessment [APP-186 to APP-188 – 3 documents] and are not forecast to be significant.
RR-TTR-02	RR-281	Concern over the impact of construction traffic on roads of Old Bedhampton which are not suited to large vehicles, including: • Brookside Road • Bidbury Lane • Mill Lane.	During construction of the Project, Brookside Road, Bidbury Lane and Mill Lane would be used to provide access to the temporary construction compound B1-1. The Applicant acknowledges the concerns regarding the suitability of these roads for larger construction vehicles and has engaged extensively with Hampshire County Council to develop a suitable and bespoke strategy for larger vehicles to access construction compound B1-1. As detailed in section 5.5 of the Framework CTMP [APP-415], this includes construction vehicle movements being restricted to the evening hours (18:00-20:00) and being escorted between a layby on Brookside Road and the construction compound access. A direct access from the A27 on-slip is also being explored with National Highways for the largest HGVs. National Highways have advised that this access would only be safe to use if the slip road is temporarily closed and therefore would only be suitable for use infrequently and when absolutely necessary.

Reference	RR references	Summary of issue raised	The Applicant's response
			As detailed in section 5.5 of the Framework CTMP [APP-415], contractor parking would be predominately located at the Water Recycling Plant, significantly reducing the number of construction workers travelling to construction compound B1-1 via Brookside Road, Bidbury Lane and Mill Lane.
RR-TTR-03	RR-300	Concern over the impact of construction traffic on existing congestion in Havant Town Centre.	The Applicant acknowledges the concerns regarding the impacts of construction traffic on existing congestion in Havant town centre. The construction access routes have been agreed with Hampshire County Council and secured through the Framework CTMP [APP-415]. These construction access routes do not permit any HGVs associated with the Project to travel through Havant town centre. ES Chapter 18 Traffic and transport [APP-097] includes an assessment of effects with regards to driver delay and did not identify any significant effects in or around Havant town centre during the construction period. The impacts of construction traffic on the local highway network are also assessed in ES Appendix 18.1 Transport Assessment [APP-186 to APP-188 – 3 documents] and no significant impacts are forecast on those roads assessed near Havant town centre.
RR-TTR-04	RR-354	Concerns over the traffic and transport disruption that would result from the 2022 consulted route options using open-cut construction, and the associated impacts on commuter routes, bus services, local amenities, access to QA Hospital, and conflicts with existing utility services.	The Applicant undertook an extensive process to refine the Project following the Summer 2022 Consultation, considering a range of environmental, planning and engineering criteria. This is set out in the Scheme Development Report [APP-073 to APP-075 – 3 documents]. This process had regard to feedback raised at the Summer 2022 Consultation and subsequent consultation, as well as engagement with Hampshire County Council to consider impacts and interfaces on the highway network. This process sought to avoid works within the highway so that impacts on the local highway network can be reduced. All A road crossings will be undertaken using trenchless construction, to avoid works within the highway. A Traffic Management Strategy [APP-416] has been prepared and details all locations where the pipeline crosses a public highway and whether open cut or trenchless crossing techniques are proposed. As detailed within the Traffic Management Strategy, trenchless crossing techniques are proposed at all routes that would be considered important at a national or regional level, and the majority of roads used by bus services. For those more minor roads where open cut techniques are proposed, traffic signals are proposed where feasible or alternative routes have been identified. ES Chapter 18 Traffic and transport [APP-097] includes an assessment of effects with regards to road and lane closures associated with construction works on driver and bus passenger delay and did not identify any significant effects during the construction period. This includes the A3 London Road that provides access towards the Queen Alexandra Hospital.

Reference	RR references	Summary of issue raised	The Applicant's response
			The detailed design of the pipeline and all works in the public highway will take account of existing utility services. The impacts of road and lane closures on public bus routes are assessed in ES Appendix 18.1 Transport Assessment [APP-186 to APP-188 – 3 documents] and no significant impacts are forecast.
RR-TTR-05	RR-354	Suggestion that highway access to the Water Recycling Plant should be considered when assessing the suitability and longevity of the Project.	The forecast traffic demand associated with the Water Recycling Plant in the operational phase is set out in section 12.2 of ES Appendix 18.1 Transport Assessment [APP-186 to APP-188 – 3 documents] and notes that the site would generate a maximum of 22 two-way vehicle trips a day of which six would be HGVs. Harts Farm Way and the onward access on the A27 is considered more than sufficient to accommodate this traffic demand and no objections have been previously received from either Hampshire County Council or National Highways as the local and national highway authorities with regards to operational traffic demand from the Water Recycling Plant.

Table 2-38 Summary of issues raised on the theme of use of Havant Thicket Reservoir for the storage of recycled water and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-UHTR-01	RR-004, RR-005, RR-009, RR-011, RR-013, RR-025, RR-031, RR-040, RR-049, RR-050, RR-057, RR-064, RR-066, RR-077, RR-082, RR-084, RR-085, RR-093, RR-096, RR-101, RR-118, RR-149, RR-163, RR-168, RR-171, RR-177, RR-184, RR-206, RR-207, RR-212, RR-213, RR-217, RR-223, RR-241, RR-242, RR-244, RR-248, RR-267, RR-270, RR-279, RR-288, RR-296, RR-300, RR-305, RR-346, RR-347, RR-355	Objections to the proposal to introduce recycled water from Budds Farm WTW into Havant Thicket Reservoir.	The Applicant has noted these comments. The Project is designed to address a critical water supply shortfall in Hampshire helping to protect sensitive chalk stream habitats. Under the already-approved reservoir scheme, spring water stored in Havant Thicket Reservoir would be used to supply Portsmouth Water customers in the Havant and Portsmouth area during a drought. This enables Portsmouth Water to share water with the Applicant from its network further in the west. If the Project is implemented, recycled water would be pumped into Havant Thicket Reservoir, mixing with spring and rainwater, further strengthening water supply resilience. Havant Thicket Reservoir was always intended to support the water supply deficit in the Applicant's Hampshire supply area. It is, however, insufficient on its own to tackle the scale of water supply deficit facing the area. The Project, through the use of water recycling, would augment the volume of water that can be supplied by Havant Thicket Reservoir alone by over 400%. The Project will take the final, treated output from Budds Farm Wastewater Treatment Works (WTW) and further process it at the Water Recycling Plant, producing high quality clean water. A discharge permit issued by the Environment Agency will ensure water is only transferred into Havant Thicket Reservoir if it meets the required standard. The Project has been identified through the Applicant's Water Resources Management Plan (WRMP) and options appraisal processes as a crucial part of its strategy to respond to current and future water supply challenges in its Hampshire supply area both in drought and normal conditions. Other solutions

Reference	RR references	Summary of issue raised	The Applicant's response
			have been extensively considered but are not available at the scale needed and, in the timescales, required. For further information, please see ES Chapter 4 Consideration of alternatives [APP-083] and the Scheme Development Report [APP-073, APP-074, APP-075] which report on the selection of the Project.
RR-UHTR-02	RR-005, RR-011, RR-018, RR-050, RR-054 RR-057, RR-066, RR-069, RR-070, RR-084, RR-085, RR-095, RR-117, RR-153, RR-157, RR-164, RR-166, RR-168, RR-177, RR-184, RR-192, RR-206, RR-223, RR-235, RR-241, RR-248, RR-262, RR-266, RR-267, RR-281, RR-288, RR-294, RR-300, RR-303, RR-346, RR-354	Concerns that the introduction of recycled water represents a fundamental change to the reservoir from the spring water fed scheme originally consented, promoted and understood by the public.	Havant Thicket Reservoir is a separate project which is being delivered by Portsmouth Water under a separate planning permission. The initial Havant Thicket Reservoir proposal, which was approved by Havant Borough Council (HBC) and East Hampshire District Council (EHDC), was for a spring-fed reservoir to enable the supply of water to the Applicant in times of drought. The Project seeks to make the best use of Havant Thicket Reservoir by using recycled water to augment the quantity of water resources available. The DCO application submitted by the Applicant seeks to change the use of Havant Thicket Reservoir to allow the storage of recycled water. The Applicant held consultations on the Project in 2022, 2024, 2025, and 2026 setting out the intention to use Havant Thicket Reservoir to store recycled water. Please also refer to RR-DCO-01 and RR-DCO-02.
RR-UHTR-03	RR-018, RR-069, RR-153, RR-192, RR-294, RR-300, RR-354	Concerns that the existing Havant Thicket Reservoir planning permissions granted by East Hampshire District Council and Havant Borough Council impose conditions restricting storage and conveyance to spring water only, and that use for recycled water requires a material change of permission and a new Environmental Impact Assessment.	The Applicant has noted these comments. The Development Consent Order (DCO) application submitted by the Applicant seeks to change the use of Havant Thicket Reservoir infrastructure to facilitate its use for the storage and conveyance of recycled water. This proposed change has been assessed in the Environmental Statement [APP-080 to APP-411 – 331 documents. Please also refer to RR-DCO-01 and RR-DCO-02.
RR-UHTR-04	RR-018, RR-069, RR-153, RR-273, RR-300, RR-354	Concerns that the Applicant's section 56 notice, Explanatory Memorandum wording and website text imply that the storage and transfer of recycled water at Havant Thicket Reservoir has already been consented, which is potentially misleading to the public.	All project information set out in the section 56 notice, Explanatory Memorandum to Draft Order [APP-024] and website text on the Planning Inspectorate website clearly set out the Project proposals and the next stages of the planning process. The description makes clear that the proposals to store recycled water at Havant Thicket Reservoir remain subject to consent through the DCO process.
RR-UHTR-05	RR-018, RR-153, RR-266, RR-294, RR-354	Request that the fundamental repurposing of Havant Thicket Reservoir and associated planning, environmental, ecological and water-quality implications be treated as a Principal Issue for examination.	The Applicant has noted these comments.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-UHTR-06	RR-005, RR-149, RR-223	Concerns that water recycling and blending into a chalk-spring-fed reservoir is an untried technology in the UK and that the reservoir is an unsuitable place to test it.	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 to remove chemicals and biological contaminants from treated wastewater. The selected process is reliable and 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 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 Applicant's Environmental Statement (ES) [APP-080 to APP-411 – 331 documents] demonstrates that the predicted changes in water quality parameters from the operation of the Project are not expected to result in any adverse changes to water quality or any change to the water body status within Havant Thicket Reservoir. Therefore, the ecological benefits previously proposed at Havant Thicket Reservoir are not affected by the Project. ES Chapter 8 Terrestrial and freshwater biodiversity [APP-087] and ES Chapter 19 Water environment [APP-098] include an assessment of the impacts associated with storing recycled water in Havant Thicket Reservoir. The Project's discharge into Havant Thicket Reservoir will be governed by an environmental permit to be issued by the Environment Agency. The environmental permit will set out the quality of water required to be discharged into the reservoir. For further information about the relationship between the DCO and the applicable regulatory regimes, please refer to Appendix D and 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).

Reference	RR references	Summary of issue raised	The Applicant's response
RR-UHTR-07	RR-009, RR-050, RR-062, RR-093, RR-155, RR-157, RR-164, RR-166, RR-207, RR-208, RR-213, RR-244, RR-256, RR-266, RR-275, RR-296, RR-300, RR-347, RR-354	Statements that Portsmouth Water should retain control and management of the reservoir rather than the Applicant, given local trust and its vested interest in maintaining water quality.	The Applicant can confirm that Portsmouth Water are delivering, and will be operating, Havant Thicket Reservoir. The Applicant notes this comment. The Project relies on the Havant Thicket Reservoir for its operation, and a detailed Scheme of Operation will be required to ensure it the interface between the Project, the reservoir and Portsmouth Water's network is managed effectively and safely. The Applicant is negotiating an agreement with Portsmouth Water, to include agreement as to the process for agreeing an Operating Protocol (equivalent to a Scheme of Operation) for the shared infrastructure. If no agreement is reached as to the form of the Operating Protocol, article 5 provides for the Scheme of Operation to be determined by the Secretary of State to ensure that there is no impediment to the delivery of the project. The output from the Water Recycling Plant (WRP) will be controlled by an environmental permit which will condition the parameters for water quality. The Applicant confirms that the reservoir would remain under the control of Portsmouth Water.
RR-UHTR-08	RR-013, RR-064, RR-066, RR-076, RR-101, RR-125, RR-156, RR-223, RR-235, RR-241, RR-266, RR-281, RR-298, RR-300, RR-354	Concerns that the introduction of recycled water would undermine the reservoir's intended function as a freshwater leisure, recreation and wildlife amenity, including on-water sports, visitor centre use and biodiversity value.	Augmenting the storage capability of Havant Thicket Reservoir by adding purified recycled water is necessary to ensure a drought-proof and resilient future water supply for the Hampshire area. A spring-fed reservoir alone, as originally consented, will not meet that need, and would require the Applicant to construct another storage reservoir, which would not represent best value for customers. Storing recycled water in Havant Thicket Reservoir is not anticipated to impact the recreational plans that Portsmouth Water has determined are suitable for Havant Thicket Reservoir. The Applicant's ES [APP-080 to APP-411 – 331 documents] demonstrates that the predicted changes in water quality parameters from the operation of the Project are not expected to result in any adverse changes to water quality or any change to the water body status within Havant Thicket Reservoir. Therefore, the ecological benefits previously proposed at Havant Thicket Reservoir are not affected by the Project. 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) include an assessment of the impacts associated with storing recycled water in Havant Thicket Reservoir.
RR-UHTR-09	RR-084, RR-118, RR-203	Suggestions that recycled water should be kept separate from spring water at Havant Thicket Reservoir, including through the use of separate reservoirs operated respectively by the Applicant (recycled water) and Portsmouth Water (spring water).	Please refer to the Applicant's response to RR-UHTR-01 and RR-UHTR-08.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-UHTR-10	RR-066, RR-068, RR-156, RR-174, RR-235, RR-300	Concerns about the sequencing of proposals, with the recycled water scheme brought forward only after the spring-water reservoir was approved and construction had begun.	Please refer to the Applicant's response to RR-UHTR-01.
RR-UHTR-11	RR-093, RR-168, RR-223, RR-266, RR-267, RR-275, RR-300	Concerns about the Applicant's operational track record and trustworthiness in relation to delivering safe recycled water into the reservoir.	The Applicant is aware of the concern that has been raised on the potential for impacts to water quality in Havant Thicket Reservoir. As a result, assessment has been undertaken to understand the impact of storing recycled water on Havant Thicket Reservoir and the relevant downstream watercourses. ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) provides an assessment of the likely significant effects on the water environment from the Project, including releases from the WRP into Havant Thicket Reservoir. The Applicant's ES [APP-080 to APP-411 – 331 documents] demonstrates that the predicted changes in water quality parameters from the operation of the Project are not expected to result in any adverse changes to water quality or any change to the water body status within Havant Thicket Reservoir. 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) include an assessment of the impacts associated with storing recycled water in Havant Thicket Reservoir. The Project's discharge into Havant Thicket Reservoir will be governed by an environmental permit to be issued by the Environment Agency. The environmental permit will set out the quality of water required to be discharged into the reservoir.
RR-UHTR-12	RR-014, RR-049, RR-057, RR-241, RR-242, RR-300	Comments that filling the reservoir with spring water, rainwater or other alternatives is a simpler, cheaper and preferable solution to the introduction of recycled water.	Relying on spring water and rainwater alone only provides a limited amount of resilience to maintain water supplies in prolonged dry weather and the Project will augment the deployable output of the reservoir by over 400%. This ensures a drought-proof supply of water, enabling a much greater proportion of the Applicant's water supply deficit to be addressed compared to a spring-fed reservoir alone, and delivering considerably better value for money. Other solutions have been extensively considered but are not available at the scale needed and in the timescales required. For further information, please see ES Chapter 4 Consideration of alternatives [APP-083] and the Scheme Development Report [APP-073, APP-074, APP-075] which report on the selection of the Project.
RR-UHTR-13	RR-050, RR-066, RR-085, RR-095, RR-101, RR-125, RR-156, RR-208, RR-235, RR-241, RR-281, RR-300, RR-354	Concerns that local residents and communities were misled about the nature of the reservoir and were not informed at the outset that recycled water would be introduced.	Please refer to the Applicant's responses to RR-UHTR-01 and RR-UHTR-02. The original reservoir planning application was for the storage of spring water only and it was consented on that basis. The local planning authority and other stakeholders were aware at the time the Havant Thicket Reservoir application was being determined in June 2021 that the Applicant was considering proposals to make best use of the reservoir as part of its consideration of alternatives to its original plan for a desalination plant at Fawley. The local planning authority made clear that the application for the reservoir must be

Reference	RR references	Summary of issue raised	The Applicant's response
			determined on the proposal put forward by Portsmouth Water and not on alternative proposals being considered by the Applicant at that time. Whilst the Applicant's WRMP favours the use of Havant Thicket Reservoir for the storage of recycled water, the DCO process will now determine whether this should be consented. The Applicant, regulators, the local planning authority and Portsmouth Water have always been open about the possible use of the reservoir for storing recycled water once this was realised as a viable option.
RR-UHTR-14	RR-069, RR-153, RR-168, RR-192, RR-266, RR-287, RR-354	Observations on the operational role of Havant Thicket Reservoir within the Project as a transfer, blending and storage facility for recycled water before onward pumping to Otterbourne WSW.	The Applicant has noted these comments.
RR-UHTR-15	RR-354	Concerns that the draft DCO provisions relating to Havant Thicket Reservoir could fundamentally alter its future operation compared to the original spring-fed scheme.	The draft DCO [APP-023] manages the inclusion of the Havant Thicket Reservoir into the overall Project. It ensures that the use of the reservoir to store recycled water for the Project, as has been fully assessed within the ES, is given effect and does not give rise to any enforcement issues connected with the more limited scope of the original planning application. The introduction of recycled water into the reservoir increases the deployable output of the reservoir, enabling it to meet a much greater proportion of the Applicant's water supply deficit. Please also refer to RR-UHTR-08 for how this use will not affect the existing proposals for recreational activity at the reservoir, and RR-UHTR-11 in relation to how the water quality of the reservoir will not be adversely affected by the addition of recycled water.
RR-UHTR-16	RR-062, RR-096, RR-354	Concerns that the draft DCO restrictions would reduce Portsmouth Water's flexibility to supply its customers from the reservoir and could increase the cost of developing alternative sources.	The Applicant notes this comment. Please refer to RR-253-17 and Appendix E to 8.9 The Applicant's written summaries of oral submissions at OFH1 and ISH1 and post hearing actions for further information about the commercial arrangements between the Applicant and Portsmouth Water. The position that Havant Thicket Reservoir is being constructed by Portsmouth Water for the benefit of Southern Water customers is confirmed by the regulator, Ofwat, in its Relevant Representation RR-232. Water supply need is established in each statutory water undertaker's WRMP. The Havant Thicket Reservoir is not identified as required for Portsmouth Water's water supply need within its WRMPs. The Applicant's WRMP identifies both the water supply shared by Portsmouth Water at Gaters Mill near Southampton for the purposes of supplying Southern Water customers (for which water may be taken by Portsmouth Water from Havant Thicket Reservoir as compensation) and the water supply to be provided by the Project as being necessary for the Applicant's future water supply. This use of the water in Havant Thicket Reservoir reflects agreed contractual principles that are subject to ongoing negotiations between the Applicant and Portsmouth Water. These principles reflect the fact that the reservoir is being provided solely to address the Applicant's water supply deficit, hence why it is being fully funded by the Applicant over the long-term. Portsmouth Water does not rely on or require the Havant Thicket Reservoir for the purposes of its water supply duty.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-UHTR-17	RR-076, RR-161, RR-266, RR-346, RR-354	Concerns about potential adverse impacts of the Project on Portsmouth Water's ability to meet obligations under the original spring-fed reservoir consent, including the Landscape Environment Management Plan and section 106 agreements.	The Applicant has noted these comments. The Project is not expected to impact Portsmouth Water's ability to meet any of the obligations under the original consent for Havant Thicket Reservoir, nor under the more recent consent for its dual pipelines between Bedhampton Springs and the reservoir. The draft DCO [APP-032] manages the inclusion of the Havant Thicket Reservoir into the overall Project, including its interaction with the existing planning permissions. This drafting ensures that the use of the reservoir to store recycled water for the Project, as has been fully assessed within the ES, is given effect and does not give rise to any enforcement issues connected with the more limited scope of the original planning application.
RR-UHTR-18	RR-354	Concerns that benefits attributed to the Project may include benefits already secured under the original Havant Thicket Reservoir consent.	Benefits attributed to the Project are additional to any benefits claimed under the original Havant Thicket Reservoir consent. The benefits for the Project are set out in the Case for the Project (Document reference 5.6, DCO Volume 5, Version 1).
RR-UHTR-19	RR-050, RR-075, RR-153, RR-166, RR-266, RR-300, RR-354	Statements of local residency, Portsmouth Water customer status or stakeholder engagement provided as context to the objection.	The Applicant has noted these comments. Please refer to the Applicant's response to RR-UHTR-01. The Planning Act 2008 (PA 2008) provides a process through which the concerns of residents, local planning authorities and other stakeholders can be properly considered, in the context of the proposals forming part of the project that Havant Thicket Reservoir is used for these purposes. The Relevant Representations stage, followed by Examination of the proposals, provide the opportunity for the complete Project, including the authorisation of the use of Havant Thicket Reservoir for recycled water, to be considered together with the national interest arising from a project of national significance. Please also refer to Appendix B 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) in relation to how customers have and will be consulted on the change of source.
RR-UHTR-20	RR-206	Statement of support for the Havant Thicket Reservoir itself and for strategic water storage, with objection confined to its use for storing recycled water as part of an indirect potable reuse scheme.	Please refer to the Applicant's response to RR-UHTR-01.
RR-UHTR-21	RR-301, RR-303	Questions raised about the source of the recycled water, the rationale for its introduction at Havant Thicket Reservoir, and whether recreational contact (including for dogs) would be safe.	The Project includes proposals to develop a WRP located at a site north-west of Budds Farm WTW. The WRP would utilise fully treated wastewater transferred from Budds Farm WTW. The WRP treatment process utilises reverse osmosis, ultraviolet advanced oxidation and granular activated carbon. The recycled water would then be transferred from the WRP site to Havant Thicket Reservoir. Further information on the nature of the Project is provided in ES Chapter 3 Description of the Proposed Development [APP-082]. Utilising the reservoir for the storage of recycled water would enable a 400% increase in the deployable output of the reservoir, making best use of its storage capacity and addressing a considerably greater proportion of the

Reference	RR references	Summary of issue raised	The Applicant's response
			Applicant's water supply deficit, ensuring a resilient and drought-proof source of water. Please refer to RR-UHTR-11 for further information about how the recycled water is safe and its quality controlled by an environmental permit issued by the Environment Agency. Storing recycled water in Havant Thicket Reservoir is not expected to impact the recreational plans that Portsmouth Water have determined appropriate for Havant Thicket Reservoir. The operation of the Project is not expected to result in any adverse changes to water quality within Havant Thicket Reservoir. Therefore, the ecological benefits previously proposed at Havant Thicket Reservoir are not affected by the Project. 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) include an assessment of the impacts associated with storing recycled water in Havant Thicket Reservoir.
RR-UHTR-22	RR-354	Concerns that the restrictions imposed on Portsmouth Water by the draft DCO would be permanent, whereas the Water Recycling Plant has a 60-year design life, and that any restriction should be limited to the operational life of the Plant or made subject to review and expiry on its decommissioning.	ES Chapter 3 Description of the Proposed Development [APP-082] sets out that each component of the Project would have a design life, however the operational life of the Project could be longer than this. The condition of the components of the Project would be reviewed at the end of their expected design life to determine whether they remain in a viable condition to continue to operate after this time or whether further maintenance would be suitable. The draft DCO [APP-023] makes provision for the Project to be capable of operating to provide water to meet the Applicant's water supply deficit. The proposals reflect the water required for each company based on contractual principles that have been agreed as part of ongoing negotiations between the Applicant and Portsmouth Water. Please refer to the joint statement at Appendix E to 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 further information on the commercial position between the Applicant and Portsmouth Water. Please also refer to RR-UHTR-16 for further information about how the Havant Thicket Reservoir is an asset being delivered for the benefit of Southern Water's customers.
RR-UHTR-23	RR-331	Concern over the Project's dependency on the unbuilt Havant Thicket Reservoir, and the risk that technical failure or delays to that separate Portsmouth Water scheme would render the proposed 40km pipeline to Otterbourne WSW redundant.	The Applicant has noted this comment. Havant Thicket Reservoir has received planning permission and is under construction, therefore there is a high degree of confidence and certainty in its delivery to enable the development and consenting of this Project in parallel. The Applicant continues to engage closely with Portsmouth Water to consider the interface between the two projects.

Reference	RR references	Summary of issue raised	The Applicant's response
RR-UHTR-24	RR-266, RR-354	Concerns over the minimum residence/retention time of recycled water in Havant Thicket Reservoir before abstraction, and changes to the reservoir's operating regime, particularly during drought drawdown.	The Applicant acknowledges the concerns around the residence time of the recycled water during drought periods, where the abstraction rate is higher and the reservoir levels are lower. The Applicant, together with Portsmouth Water (the operator of Havant Thicket Reservoir), has undertaken extensive water quality modelling of Havant Thicket Reservoir. The modelling presented in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1) considered a range of different operational scenarios. These scenarios include variations in the proportion of water from different inputs and variations in reservoir yield, to simulate a range of drought conditions and other potential operational scenarios. The results of these scenarios are compared to the baseline operational scenario, and conclude that changes in water quality within the Havant Thicket Reservoir and in withdrawal water between the scenarios are small and safe for abstraction. The modelling also predicts changes to the way in which the Havant Thicket Reservoir is operated (in terms of the volume and timing of inputs and withdrawals) which would reduce the residence time of water in the reservoir. As noted above, the changes to the water quality were found to be small and the water continued to be safe for abstraction. The Applicant is therefore confident that the water within Havant Thicket Reservoir will be safe for abstraction in all circumstances, including during drought drawdown.
RR-UHTR-25	RR-354	Suggestions that if recycled water quality is unsuitable for discharge into the River Itchen, it cannot be acceptable to discharge it into the Havant Thicket Reservoir where flow is minimal.	The water recycling option which included a discharge into the Lower Itchen was considered as part of the Applicant's options appraisal process undertaken in 2021 pursuant to WRMP19 and as part of the RAPID gated process. This option, referred to as Option B.1, was eliminated from further investigations because of concerns raised by Natural England and the Environment Agency about the potential impact of the discharge on the integrity of the River Itchen Special Area of Conservation in terms of flow and quality, and because it was highlighted by the Environment Agency that this option would have little benefit in offsetting water resource deficit if inputted below the abstraction point. Further information is provided at paragraph 4.2.6 of ES Chapter 4 Consideration of alternatives [APP-083]. The Project's discharge into Havant Thicket Reservoir has been supported by Natural England and the Environment Agency, through the options appraisal process, through the Project's inclusion in the Applicant's emerging WRMP24 and through the Project's pre-application stage of the DCO consenting process. The Project's release of recycled water into the reservoir will be controlled by an environmental permit to be issued by the Environment Agency. The environmental permit will set out the quality of water required to be discharged into the reservoir. Through its assessment presented in ES Chapter 19 Water environment [APP-098], the Applicant has demonstrated that the introduction of recycled water would not fundamentally alter the water quality and consented character of Havant Thicket Reservoir.

Reference	RR references	Summary of issue raised	The Applicant's response
			For further information about how the discharge of recycled water into the reservoir is safe, please refer to RR-UHTR-11 and RR-UHTR-24.
RR-UHTR-26	RR-354	Concerns over the potential expansion of discharge volumes into the Havant Thicket Reservoir beyond initial permitted quantities.	The Project's discharge into Havant Thicket Reservoir will be governed by an environmental permit to be issued by the Environment Agency. The environmental permit will set out the volumes of recycled water that may be discharged into the reservoir, and the required quality of the recycled water. The Applicant is seeking a permit that facilitates the maximum output that the water recycling plant will be designed for, to ensure that the full benefits of this sustainable water source are realised. Any discharge in excess of the volumes set out in the environmental permit, once granted, would be contrary to that permit and subject to enforcement action by the Environment Agency.

Table 2-39 Summary of issues raised on the theme of water environment and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-WEN-01	RR-003, RR-018, RR-026, RR-128, RR-129, RR-157, RR-230, RR-266, RR-288, RR-306, RR-354	Concerns that reject water discharged via the Eastney Long Sea Outfall will be more concentrated in contaminants, cited as approximately four times more concentrated, than the existing Budds Farm WTW discharge, and that the existing outfall and discharge permit may not be suitable for the changed composition and concentration of the reject stream, worsening pollution of the Solent and adjoining harbours.	The Applicant currently discharges treated effluent from Budds Farm Water Treatment Works (WTW) from Eastney Long Sea Outfall (LSO) under an existing water release activity permit (reference A.751/H/97). The Applicant is seeking a new permit from the Environment Agency that will enable reject water from the Water Recycling Plant (WRP) to be discharged via Eastney Long Sea Outfall (LSO). The Applicant acknowledges that the water recycling process would result in contaminants in the reject water from the WRP being more concentrated than those in the final effluent that is discharged from Budds Farm WTW via Eastney LSO. The Applicant has therefore undertaken water quality modelling to assess whether any changes in concentrations could result in additional effects on marine water quality. The full results of this modelling are presented in Environmental Statement (ES) Appendix 19.5 Eastney LSO dispersion modelling [APP-200] and ES Appendix 19.8 CORMIX Modelling for Chemicals Screened in via the Surface Water Risk Assessment Process [APP-203]. The assessment process for the consideration of chemicals in the release from Eastney LSO followed the Environment Agency guidance for surface water pollution risk assessment, which requires a number of screening tests to evaluate which chemicals are at risk of failing their Environmental Quality Standard (EQS). EQS are legal limits determined by the EA which set the maximum concentrations of specific pollutants in the environment. Where this was the case, the parameter was carried forward for modelling and assessment in line with this guidance. Model outputs predict that the differences in the Solent between the existing Budds Farm WTW release and the operational Project scenario are insignificant (ES Appendix 19.5 Eastney LSO dispersion modelling [APP-200]). With respect to chemicals in the Long Sea Outfall release (ES Appendix 19.8 CORMIX Modelling for Chemicals Screened in via the Surface Water Risk

Reference	RR references	Summary of issue raised	The Applicant's response
			Assessment Process [APP-203]), compliance with the EQS is met within 1-2 m from the outfall thus indicating rapid dilution. Given the scale of the predicted changes for the currently consented parameters and distance to EQS for the chemical parameters screened in, the addition of the reject water to the existing discharge would not result in any changes to water quality and changes would not extend into connected water bodies such as Langstone Harbour or the tidally influenced Hermitage Stream. The output from the WRP into the reservoir will be subject to an environmental permit, issued by the Environment Agency, which will require the quality of the recycled water to meet the standard specified to ensure there are no unacceptable impacts to the environment, including in downstream waterbodies. The Environment Agency, as expert regulator, will determine the parameters for the discharge that will be secured in the environmental permit to ensure that there are no unacceptable impacts to the environment. The Applicant will comply with the conditions of the environmental permit, ensuring that the recycled water does not cause harm to the environment. For further information about the relationship between the DCO and the applicable regulatory regimes, please refer to Appendix D and 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).
RR-WEN-02	RR-003, RR-026, RR-107, RR-128, RR-129, RR-235, RR-248, RR-266, RR-281, RR-288, RR-294, RR-300, RR-306, RR-354	Concerns over adverse effects of reject water discharges on the internationally designated SPA, SAC, Ramsar and SSSI sites at Langstone Harbour, Chichester Harbour and the wider Solent.	As stated in the response to WEN-01, model outputs predict that the differences in the Solent between the existing Budds Farm WTW and the operational Project scenario are insignificant (ES Appendix 19.5 Eastney LSO dispersion modelling [APP-200]). With respect to chemicals in the Long Sea Outfall release (ES Appendix 19.8 CORMIX Modelling for Chemicals Screened in via the Surface Water Risk Assessment Process [APP-203]), the distance at which the Environmental Quality Standard for the parameters screened in has been calculated as being 1-2m from the outfall thus indicating rapid dilution. As the Long Sea Outfall release will be rapidly diluted with 2 m of the outfall location, there is no pathway for effect on designated sites in the Solent or associated harbours. Please also refer to RR-WEN-01.
RR-WEN-03	RR-026, RR-036, RR-128, RR-129, RR-235, RR-248, RR-266, RR-288, RR-294, RR-306, RR-354	Concerns that contaminants of emerging concern (including PFAS 'forever chemicals', pharmaceuticals, microplastics, endocrine disruptors, disinfection by-products, transformation products and trifluoroacetic acid) have not been adequately modelled or assessed.	As stated in section 19.8 of ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1), the Applicant has undertaken an extensive programme of monitoring of a wide range of Contaminants of Emerging Concern (CECs) in the final treated wastewater from Budds Farm WTW (i.e. a representation of influent water quality to the WRP) and water treated in its pilot treatment plant at Budds Farm WTW. The Applicant's monitoring included a range of potential CECs, with more than 400 substances selected to reflect global best practice for the development of water recycling schemes and risks identified from numerous trade licences in

Reference	RR references	Summary of issue raised	The Applicant's response
			the catchment that contributes wastewater to Budds Farm WTW. These substances included: • Pharmaceuticals and Personal Care Products: Organic contaminants sourced from pharmaceutical products and their metabolites, cosmetics, soaps and shampoos, which can be found in trace levels in wastewater. • Industrial chemicals: Substances such as per- and poly-fluoroalkyl substances (PFAS), polycyclic aromatic hydrocarbons (PAHs), volatile organic compounds (VOCs) and inorganic contaminants (including some trace metals). Although some specific compounds within these broad categories of chemicals have an established Environmental Quality Standard (EQS) (including some metals, PAHs and several PFAS compounds, this is not the case for the majority of these substances. • Agricultural chemicals: Substances such as pesticides and fertilizers that can be found in surface water runoff. The pilot plant included a Full Advanced Treatment process, comprising integrated membranes followed by an ultraviolet and advanced oxidation process. Although this does not include the Granular Activated Carbon (GAC) and remineralisation processes that will be present within the WRP, the pilot plant included the multi-barrier treatment process that will be primarily responsible for the effective removal of contaminants from the treated wastewater. As some contaminants would also be removed by the GAC process, the results from the pilot plant therefore represent an underestimate of the performance of the full WRP and are therefore considered to be the worst case. The results of the pilot plant investigation are described in an independent review produced by the University of Brighton (Mayor-Smith (2024) [1], as referenced in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1). The results of the investigation into pilot plant performance indicate that the Full Advanced Treatment process resulted in a considerable increase in water quality, with the concentration of CECs decreasing after passing through the pilot plant. Over 60% of the CECs measured in the WRP influent decreased to below the limits of detection in the water that had passed through the WRP, with the largest reductions identified for a range of pharmaceuticals, personal care products and pesticides. The results of the pilot study clearly demonstrate that CEC concentrations in the recycled water are considerably lower than those in the treated wastewater from Budds Farm WTW that is currently released under a permitted discharge into the Solent via Eastney LSO. This suggests that any CECs remaining in the WRP output would be present in extremely low concentrations. Significant adverse effects on water quality and biota from CECs are therefore considered unlikely, particularly given that the pilot plant data does not represent the full treatment process that would be in place at the WRP (which would also include a GAC treatment stage that would also remove contaminants from the recycled water).

Reference	RR references	Summary of issue raised	The Applicant's response
			It should also be noted that the output from the water recycling plant will be subject to an environmental permit, issued by the Environment Agency. The Environment Agency, as expert regulator, will determine the parameters for the discharge that will be secured in the environmental permit to ensure that there are no unacceptable impacts to the environment. In accordance with paragraph 3.8.3 of the National Policy Statement for Water Resources Infrastructure, the DCO does not seek to duplicate this regulatory regime. For further information about the relationship between the DCO and the applicable regulatory regimes, please refer to Appendix D and 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).
RR-WEN-04	RR-018, RR-036, RR-129, RR-248, RR-266, RR-288, RR-306, RR-354	Concerns over the potential for bioaccumulation of persistent contaminants in sediments, marine food webs and wildlife in Langstone Harbour and the Solent.	As stated in the responses to RR-WEN-01 and RR-WEN-02 with respect to chemicals in the LSO discharge and the response to RR-WEN-03 with respect to chemicals in recycled water from the Budds Farm pilot plant, potential for bioaccumulation of persistent chemicals is unlikely to be significant at extremely low concentrations and rapid dilution. The scale of change in bioaccumulation is considered negligible. Therefore, the potential for bioaccumulation of persistent contaminants in sediments, marine food webs and wildlife in Langstone Harbour and the Solent is unlikely to be significant.
RR-WEN-05	RR-129, RR-306, RR-354	Concerns that modelling of the coastal discharge has been limited to traditional parameters (copper and Triphenyltin) and does not adequately address dispersal, sediment accumulation or in-combination effects with the Havant Thicket Reservoir operating regime and other planned recycling plants at Ford and Sandown.	The assessment process for the consideration of chemicals in the LSO release followed the Environment Agency guidance for surface water pollution risk assessment, which requires a number of screening tests to evaluate which of a broad range of chemicals are at risk of failing their EQS. Where this was the case, the parameter was carried forward for modelling in line with this guidance. EQS are legal limits determined by the EA which set the maximum concentrations of specific pollutants in the environment. Model outputs predict that the differences in the Solent with respect to Budds Farm WTW discharge between the existing scenario and the operational Project scenario are insignificant (ES Appendix 19.5 Eastney Long LSO dispersion modelling [APP-200]). With respect to chemicals in the LSO discharge (ES Appendix 19.8 CORMIX Modelling for Chemicals Screened in via the Surface Water Risk Assessment Process [APP-203]), the distance at which the EQS for the parameters screened in has been calculated as being 1-2 m from the outfall thus indicating rapid dilution at the outfall location. Given the scale of the predicted changes for the currently consented parameters and distance to EQS for the chemical parameters screened in, ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) concludes that the addition of the reject water to the existing release would not result in any changes to water quality and changes would not extend into connected water bodies such as Langstone Harbour or the tidally influenced Hermitage Stream. Section 5 of ES Chapter 20 Cumulative and in-combination effects [APP-099] provides the assessment methodology for the CEA. Table 20-9, within section 5, provides the tiered approach for which 'other development' projects are

Reference	RR references	Summary of issue raised	The Applicant's response
			considered in the CEA. Table 20-9 sets out the three tiers of other existing and or approved development as set out in table 2 of the Planning Inspectorate (2024) Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment. The other planned recycling plants at Ford and Sandown are not projects that fall into one of the three tiers as they are not: • An under construction, permitted application under the Planning Act (2008) or submitted application under the Planning Act or other regime but not yet determined (Tier 1) • A project on the Planning Inspectorate's programme of projects (Tier 2) • A project on the Planning Inspectorate's programme of projects where a scoping report have not been submitted; identified in the relevant Development Plan and emerging Development Plan, or identified in other plans and programmes as appropriate, which set the framework for future development consents or approvals, where such development is reasonably likely to come forward (Tier 3) As these sites do not fall within one of the three Tiers, they are not considered within the CEA. They were however, considered in the Habitats Regulation Assessment – Stage 2 Appropriate Assessment and Marine Conservation Zone – Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2) for the Project. These assessments considered the potential impact pathways arising from the Project that could affect the ecology of Chichester and Langstone Harbours Special Protection Area (SPA) and Ramsar, Solent Maritime (Special Area of Conservation) SAC and Langstone Harbour Site of Special Scientific Interest (SSSI). These documents conclude no adverse effect on the integrity of these sites and no significant adverse effects will occur as a result of the Project. In-combination effects, including for the Isle of Wight Water Recycling Project and Ford Water Recycling Project, are detailed within the Habitats Regulation Assessment – Stage 2 Appropriate Assessment and Marine Conservation Zone – Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2). The Habitats Regulations Assessment undertaken for the Isle of Wight Water Recycling Project concluded no adverse effects on the integrity of the relevant National Site Network Sites (Solent and Isle of Wight Lagoons SAC, and Solent and Southampton Water SPA and Ramsar). It should also be noted that the output from the water recycling plant will be subject to an environmental permit, issued by the Environment Agency. The Environment Agency, as expert regulator, will determine the parameters for the discharge that will be secured in the environmental permit to ensure that there are no unacceptable impacts to the environment. In accordance with paragraph 3.8.3 of the National Policy Statement for Water Resources Infrastructure, the DCO does not seek to duplicate this regulatory regime. For further information about the relationship between the DCO and the applicable regulatory regimes, please refer to Appendix D and to Appendix F of The

Reference	RR references	Summary of issue raised	The Applicant's response
			Applicant's written summaries of oral submissions at OFH1 and ISH1 and post hearing actions (Document reference 8.9, DCO Volume 8, Version 0).
RR-WEN-06	RR-354	Concerns over the transparency and legibility of the CORMIX screening data for coastal discharge presented in ES Appendix 19.8.	Appendix A of ES Appendix 19.8 CORMIX Modelling for Chemicals Screened in via the Surface Water Risk Assessment Process [APP-203] includes all the workbook data produced from the H1 screening assessment. The Applicant acknowledges that the font is small so that all of the spreadsheet data can be accommodated within the constraints of a pdf document, but the text is clear and legible when zoomed in. Furthermore, a concise summary of the CORMIX modelling results is provided in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1).
RR-WEN-07	RR-027, RR-035, RR-058, RR-107, RR-129	Concerns over impacts on chalk streams, nitrate loading and the risk of toxic algal blooms in Langstone Harbour arising from changed operation of Bedhampton Springs.	Potential impacts on the water environment, including chalk streams, have been assessed 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 River Meon and River Itchen and Itchen Navigation chalk streams will be crossed using trenchless techniques and environmental measures are included in the Outline Construction Environmental 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) to manage risks from turbid runoff (Measure WE4), soil erosion (Measure WE5), construction plant (Measure WE6) and drilling fluids (WE14). In addition, due to the spatial and temporal variability of the water environment, monitoring of receptors susceptible to potential impacts is critical; particularly when working in or proximal to high value receptors, or where there are increased uncertainty/risks, such as within the karstic chalk aquifer. To manage risks, the contractor is to produce a Water Monitoring Plan in line with ES Appendix 19.9 Outline Water Monitoring Plan [APP-204]. ES Appendix 19.7 Nutrient Assessment [APP-202] confirms that the Project will be compliant with the Conservation of Habitats and Species Regulations 2017, with reference to Natural England's nutrient neutrality guidance. The Nutrient Assessment calculates that the Project would reduce total nitrogen loads by 833 kg/yr during the construction phase and 8,742 kg/yr during the operational phase and concludes that no additional mitigation would be required to achieve nutrient neutrality during the construction and operational phases. The reduction in total nitrogen loads to from Eastney LSO and into Havant Thicket Reservoir and Langstone Harbour (via compensation flows into Riders Lane Stream) means that the Project will not increase the risk of toxic algal blooms in the harbour. The Applicant has undertaken detailed modelling of water quality in Havant Thicket Reservoir (ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1) and downstream water bodies receiving compensatory flows, including Riders Lane Stream, Hermitage Stream and Langstone Harbour (ES Appendix 19.6 Havant Thicket Reservoir Compensatory Flows water quality modelling [APP-

Reference	RR references	Summary of issue raised	The Applicant's response
			201] and ES Appendix 19.10 Degradation modelling [APP-205]. Modelling includes the use of a High Rejection Rate Membrane (HRRM) at the WRP, which demonstrates that water quality in Havant Thicket Reservoir would remain consistent with the definition of 'high' status for a lake water body under the Water Framework Directive (WFD) Directions 2015 and that water quality in downstream receiving water bodies would not be adversely affected. The Project would not, therefore, result in a deterioration in water quality in either Havant Thicket Reservoir or the downstream water bodies receiving compensatory flows (including Langstone Harbour). The addition of the HRRM would avoid the accumulation of phosphorus within Havant Thicket Reservoir and prevent it switching to a eutrophic state or causing algal blooms in the reservoir or downstream in Langstone Harbour. The output from the water recycling plant will be subject to an environmental permit, issued by the Environment Agency. The Environment Agency, as expert regulator, will determine the parameters for the discharge that will be secured in the environmental permit to ensure that there are no unacceptable impacts to the environment. For further information about the relationship between the DCO and the applicable regulatory regimes, please refer to Appendix D and 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).
RR-WEN-08	RR-354	Concerns over downstream water quality impacts on the Hermitage Stream, Riders Lane Stream and Langstone Harbour, including loss of previously predicted benefits under the Water Framework Directive.	The Applicant has undertaken detailed modelling of water quality in Havant Thicket Reservoir (ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1)) and downstream water bodies receiving compensatory flows, including Riders Lane Stream, Hermitage Stream and Langstone Harbour (ES Appendix 19.6 Havant Thicket Reservoir Compensatory Flows water quality modelling [APP-201] and ES Appendix 19.10 Degradation modelling [APP-205]. The modelling includes the use of a High Rejection Rate Membrane (HRRM) at the WRP, and demonstrates that water quality in Havant Thicket Reservoir would remain consistent with the definition of 'high' status for a lake water body under the Water Framework Directive (WFD) Directions 2015 and that water quality in downstream receiving water bodies would not be adversely affected. The Project would not, therefore, result in a deterioration in water quality in either Havant Thicket Reservoir or the downstream water bodies receiving compensatory flows. The output from the water recycling plant into the reservoir will be subject to an environmental permit, issued by the Environment Agency, which will require the quality of the recycled water to meet the standard specified to ensure there are no unacceptable impacts to the environment, including in downstream waterbodies. For further information about the relationship between the DCO and the applicable regulatory regimes, please refer to Appendix D and to Appendix F

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			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).
RR-WEN-09	RR-294, RR-354	Concerns that watercourse enhancement measures secured through the original Havant Thicket Reservoir consent may not be deliverable or meaningful if the draft DCO is made, and suggestions that additional freshwater ecological mitigation and improvement funds (including for coastal erosion, footpath and habitat improvements at Broadmarsh and along Hermitage Stream and Riders Lane Stream) should be provided within Havant Borough.	The Applicant has taken account of the Regulation 19 river enhancement measures that have been agreed between the Environment Agency and Portsmouth Water as mitigation for the construction of Havant Thicket Reservoir as part of the future baseline considered within the assessment in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1). These measures, which are to be delivered by Portsmouth Water and secured through the relevant planning and regulatory mechanisms, comprise a package of geomorphological and habitat improvements within Hermitage Stream, Riders Lane Stream and Park Lane Stream. As set out in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) and ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1), the future baseline includes the implementation of these committed enhancements, which have been considered in the assessment of the Project. The measures considered include: • Upper Hermitage Stream at The Queen's Inclosure (sic): Localised tree pollarding/coppicing and installation of leaky woody barriers to improve habitat diversity and slow the flow. • Hermitage Stream from Bushy Lease to New Road: Removal of concrete bed and bank protection, and installation of in-channel berms to increase flow sinuosity. • Headwaters of Riders Lane Stream: There is potential to construct a pond area to create additional water habitat. Further downstream, there is potential to design leaky woody barriers situated together to help slow the flow and create habitat diversity. • Park Lane Stream at Waterlooville Golf Club: Re-naturalise the channel through the removal of bank protection, increasing sinuosity, bank re-profiling and de-culverting. • Park Lane Stream in Bell's Copse: Slow the flow by installing leaky woody barriers. As demonstrated in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1), the Project would not alter the hydrology of the Riders Lane Stream, which would remain subject to compensation flows agreed between Portsmouth Water and the Environment Agency, and would not result in any direct disturbance of the watercourse. Furthermore, the modelling presented in ES Appendix 19.6 Havant Thicket Reservoir Compensatory Flows water quality modelling [APP-201] and ES Appendix 19.10 Degradation modelling [APP-205] predicts that the introduction of recycled water into the reservoir would not result in significant adverse effects on water quality in Riders Lane Stream.

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			On this basis, the assessment presented in Table 8-4 of ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1) concludes that the Project would not prevent these mitigation measures being implemented in the future, or reduce their effectiveness once implemented. The Applicant sets out its strategy for the delivery of environmental enhancements in the Environmental Net Gain Statement [APP-427]. This identifies several packages of environmental improvements, including the Broadmarsh Coastal Park Improvement Fund; this package of interventions will include enhanced planting and landscaping and improvements to Public Rights of Way that will deliver biodiversity and social co-benefits within the Borough of Havant. The Environmental Net Gain Statement [APP-427] also identifies several Environmental Mitigation and Enhancement Areas (EMEAs) where further enhancements that go beyond mitigation will be delivered. This includes at the Water Recycling Plant (WRP) site where there is opportunity to deliver improvements to the tidal Hermitage Stream, existing habitats and public access in accordance with the principles set out in Table 3.1 in the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1).
RR-WEN-10	RR-018, RR-192, RR-294, RR-354	Concerns that flood risk has been omitted from the Applicant's list of Potential Main Issues despite its assessment in the Environmental Statement and inclusion of Budds Farm WTW and the WRP site within Flood Zones 2 and 3.	The Applicant has assessed flood risk from different elements of the Project in considerable detail. These reports are appended to the main ES as follows: • ES Appendix 19.1 Flood Risk Assessment - 1 of 8 documents [APP-189] (Preliminary Flood Risk Assessment). • ES Appendix 19.1 Flood Risk Assessment - 2 of 8 documents [APP-190] (WRP Flood Risk Assessment). • ES Appendix 19.1 Flood Risk Assessment - 3 of 8 documents [APP-191] (Budds Farm Wastewater Treatment Works Pumping Station and Motor Control Centre Kiosk Flood Risk Assessment). • ES Appendix 19.1 Flood Risk Assessment - 4 of 8 documents [APP-192] (Break Pressure Tank and Intermediate Pumping Station E Flood Risk Assessment). • ES Appendix 19.1 Flood Risk Assessment - 5 of 8 documents (Intermediate Pumping Station F Flood Risk Assessment) [APP-193] (Intermediate Pumping Station F Flood Risk Assessment). • ES Appendix 19.1 Flood Risk Assessment - 6 of 8 documents (Intermediate Pumping Station G Flood Risk Assessment) [APP-194] (Intermediate Pumping Station G Flood Risk Assessment). • ES Appendix 19.1 Flood Risk Assessment - 7 of 8 documents (Break Pressure Tank K Flood Risk Assessment) [APP-195] (Break Pressure Tank K Flood Risk Assessment).

Reference	RR references	Summary of issue raised	The Applicant's response
			• ES Appendix 19.1 Flood Risk Assessment - 8 of 8 documents [APP-196] (Flood Risk Assessment Sustainable Drainage Systems (SuDS) Strategy). Accordingly, flood risk has been comprehensively assessed through the suite of ES Appendix 19.1 Flood Risk Assessment - 1 of 8 to 8 of 8 documents [APP-189, APP-190, APP-191, APP-192, APP-193, APP-194, APP-195, APP-196]. On the basis of these assessments, the Applicant has provided evidence that flood risk will be well controlled and does not constitute a Potential Main Issue.
RR-WEN-11	RR-192, RR-266, RR-294, RR-354	Concerns over long-term flood risk, tidal surge, sea level rise and coastal erosion affecting the WRP, Budds Farm WTW and Harts Farm Way access route over the design life of the Project, and whether the cost and environmental impacts of any sea defences required to safeguard these assets have been assessed.	Please refer to the Applicant's response to RR-WEN-10 above, which lists all of the flood risk assessments that have been produced for the Project. The site-specific Flood Risk Assessment (FRA) for the WRP (ES Appendix 19.1 Flood Risk Assessment – 2 of 8 documents [APP-190]) demonstrates that the WRP is in Flood Zone 1 now and when considering climate change to 2125 (sea and tidal flooding 'upper end' allowances are used to account for cumulative sea level rise to 2125, based on the 95th percentile). As such it is not expected to be affected by future tidal flooding over its design life. This is also the case for the majority of Harts Farm Way and access to the WRP with the exception of the crossing over the Hermitage Stream. Regarding conditions at the coast, the conclusions of the site-specific FRA for the Budds Farm WTW Pumping Station (ES Appendix 19.1 Flood Risk Assessment – 3 of 8 documents [APP 191]) are that the new infrastructure would be elevated above the 1 in 200-year tidal flood level with the H++ climate change allowance applied. The H++ allowance represents a credible maximum scenario for sea level rise due to climate change. It is used to account for extreme climate change impacts and involves adding 1.9 meters to the present-day 1 in 200-year tidal flood level. As such the new development within Budds Farm WTW would be resilient to this future tidal flood risk, to ensure that treated wastewater can continue to be sent to the WRP for ongoing treatment.
RR-WEN-12	RR-210	Concerns that pipeline routing through Eastleigh Borough Council land parcel Area 7a threatens the West Horton Stream and headwater springs of the internationally protected River Itchen catchment through fracturing of chalk aquifers, siltation and nutrient leaching.	Due to the spatial and temporal variability of the water environment, monitoring of receptors susceptible to potential impacts is critical; particularly when working in or proximal to high value receptors, or where there are increased uncertainty/risks, such as within the karstic chalk aquifer. To manage risks, the Contractor will produce a Water Monitoring Plan in line with ES Appendix 19.9 Outline Water Monitoring Plan [APP-204] to monitor high value receptors during construction. In terms of potential siltation, the Outline Construction Environmental Management Plan (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:

Reference	RR references	Summary of issue raised	The Applicant's response
			• 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. • WE14: The Contractor will produce a Drilling Fluid Management Plan to manage the risks of fluid breakouts during construction of trenchless crossings. In addition, ES Appendix 19.7 Nutrient Assessment [APP-202] confirms that the Project will be compliant with the Habitats and Species Regulations 2017, with regard to Natural England nutrient neutrality guidance. The Nutrient Assessment concludes that, on the basis of nutrient management measures embedded within the Project, no additional mitigation would be required to achieve nutrient neutrality during the construction and operational phases. The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) also includes measures to ensure soil stripping, handling, storage and reinstatement procedures should conform with the relevant best practice guidance. This will mitigate any risks from nutrient leeching from stripped or excavated soils. On the basis of these measures, ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) concludes that there would be no significant adverse effect on surface or groundwater receptors in the catchments of the River Itchen and tributaries such as Bow Lake during the construction and operation of the Project.
RR-WEN-13	RR-210	Concerns that trench excavation and backfill will create a "French drain" effect causing upstream dewatering of chalk aquifers and downstream flooding, waterlogging and destruction of floodplain wetland at East Horton.	The Pipeline would cross several Ordinary Watercourses that drain in a broadly south-easterly direction from south of the B2177 towards East Horton Farm, where they join Ford Lake, itself a tributary of the River Hamble. The Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) describes measures to prevent the pipe bedding of the proposed Pipeline acting as a long linear pathway for flows or dewatering the surrounding chalk. Flood risk associated with the Pipeline is described in ES Appendix 19.1 Flood Risk Assessment – 1 of 8 documents [APP-189]. These have assessed the potential flood to and from the Project. Furthermore, the Applicant has committed to a series of measures to prevent changes to drainage patterns and avoid changes to flood risk following installation of the Pipelines. These include: • Measure WE4 in the Outline Construction Environmental Management Plan (CEMP) (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). A Construction Drainage Plan will be prepared by the Contractor, to manage 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. It will include measures to reduce water within the working area and ensure ongoing drainage of surrounding land. The plan will set out a suitable

Reference	RR references	Summary of issue raised	The Applicant's response
			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. • Tertiary Measure 7 in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1). Where the pipeline has the potential to be installed below groundwater level in permeable strata, clay stanks would be used at regular intervals to prevent the pipeline acting as a preferential pathway. These measures will therefore ensure that the pipe bedding does not act as a French drain that causes dewatering, flooding or floodplain destruction at East Horton. On the basis of these measures, ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1), concludes that there would be no significant adverse effect on flood risk or water-dependent receptors in the River Hamble catchment.
RR-WEN-14	RR-237	Concerns over increased flow, bank erosion, elevated water levels and debris accumulation in the watercourse adjoining a property downstream of the reservoir works, compounded by declining vegetation health in the adjacent Conservation area.	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 areas downstream of Havant Thicket Reservoir, are presented in ES Appendix 19.1 Flood Risk Assessment [APP-189]. This concludes that the Pipeline is appropriate for the location and that measures WE4 and WE5 in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) would appropriately manage flood risk during the construction phase and would not result in an increase in off-site flood risk. The assessment presented in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) therefore concludes that the Project would not result in significant adverse effects on flood risk or geomorphology in Riders Lane Stream or Hermitage Stream during construction. During the operational phase, the Project will not directly interact with watercourses or riparian vegetation in the Hermitage Stream catchment, including Riders Lane Stream and Hermitage Stream itself. The Pipeline between Budds Farm WTW and Bedhampton Springs being installed using trenchless construction, at least 2.5m below the bed of surface watercourses. As described in ES Chapter 3 Description of the Proposed Development [APP-

Reference	RR references	Summary of issue raised	The Applicant's response
			082], these would connect to pipelines between Bedhampton Springs and Havant Thicket Reservoir that will be constructed on behalf of Portsmouth Water and do not form part of the Project. Furthermore, changes in the way in which Havant Thicket Reservoir will operate, including the volume of compensation flows released downstream, which will remain subject to the conditions of the impoundment licence agreed between the Environment Agency and Portsmouth Water. Compensation flows agreed under the impoundment licence would maintain the existing flow rate downstream and not increase flood risk or erosion rates. The assessment presented in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) therefore concludes that the Project would not result in significant adverse effects on flood risk, in-channel debris accumulation or geomorphology in Riders Lane Stream or Hermitage Stream during operation.
RR-WEN-15	AS-030	Concerns that the Applicant's flood risk assessment and resulting standard of protection are inadequate, including the presentation of the 0.5% annual probability as a 1 in 200-year event, the sea level baseline used, the exclusion of wave action from the H++ allowance, and the suitability of a 0.5% annual probability for a project with a 100-year design life.	ES Appendix 19.1 Flood Risk Assessment - 1 of 8 documents [APP-189] adopts the 0.5% annual exceedance probability (AEP) (1 in 200-year) tidal event as the design flood event, consistent with the Planning Practice Guidance, which identifies the design flood for tidal flooding as a 0.5% annual probability event. Future risk over the asset's 100-year design life has been assessed through application of the relevant climate change allowances. The assessment applies the H++ sea level rise allowance, which represents the credible maximum scenario for sea level rise and is applied for nationally significant infrastructure. A separate wave allowance was not applied, as the assessment was not based on a coastal flood model. Environment Agency guidance states that offshore wind speed and extreme wave height allowances are required where these processes are not already incorporated within a coastal model.
RR-WEN-16	RR-354	Concerns over water environment impacts arising from pipeline washouts, sediment build-up and the practicality of tanker collection during flushing and repair operations.	As stated in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1), during normal operation the washout valves would be inspected and tested to check that the valves are operational. All source water resulting from the testing of washout valves would be collected directly by a tanker, with no source water discharged to the environment (land or watercourse). This could require the installation of temporary pumping and flexible pipework to connect the tanker to the washout valve. Testing of a washout valve would result in the release of up to approximately 4.5m^3 of source water from the Pipelines, requiring only one tanker. Testing of washouts would be required approximately once every six months. Potential effects arising from washouts have been assessed in section 19.8 of ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1), which identifies no significant adverse effects on the water environment. The Contractor will assess the risk of sediment accumulation as part of the detailed design stage and ensure an appropriate regime and mitigation is in place to handle the sediment load along the pipeline. The design will be

Reference	RR references	Summary of issue raised	The Applicant's response
			undertaken according to the commitment set out in Requirement 3 in Part 1 of Schedule 2 of the draft DCO [APP-023]. Operational sediment management procedures will be established under the Operational Environmental Management Plan [APP-422], secured under Requirement 13 in Part 1 of Schedule 2 of the draft Development Consent Order [APP-023]. Generally, sediment will be transferred to Otterbourne Water Supply Works during normal operation and would not be released into the environment during washout valve testing.
RR-WEN-17	RR-354	Concerns over the impact of tunnelling through the chalk aquifer on the Havant and Bedhampton Springs drinking water source.	Sections of trenchless construction are proposed in the chalk aquifer to the south/southwest of the Havant and Bedhampton Springs, although none within Source Protection Zone 1. A Hydrogeological Impact Assessment (HIA) has been undertaken as part of ES Appendix 19.3 Hydrogeological Impact Assessment [APP-198] to assess the impacts on groundwater from the Project, with special consideration of the risks in the Principal chalk aquifers and associated water resources (such as impacts to the public water supplies). This assessment informed the mitigation measures, including embedded mitigation measures to limit works within the chalk aquifers and tertiary measures (such as pollution prevention and control measures) as outlined in the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) to prevent potential pollution of the vulnerable chalk aquifer. Engagement with key stakeholders, such as the Environment Agency, has been undertaken throughout the Project development and assessment in Section 19.8 of ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) and will continue post-DCO.
RR-WEN-18	AS-030	Concerns over the scope of flood protection measures for the Project, including the absence of secured coastal defence plans and funding, flood control for the tidal Brockhampton Stream and Hermitage Stream running through the site, and protection of access routes.	The Shoreline Management Plan policy for the defences protecting Budds Farm Wastewater Treatment Works (Budds Farm WTW) is to "Hold the Line" for both flood and erosion risk. "Hold the Line" is an approach to maintain or upgrade protection from flooding and erosion by holding the shoreline in broadly the same position. Tidal flood risk, including potential interactions with the Brockhampton Stream and Hermitage Stream, has been considered through the ES Appendix 19.1 Flood Risk Assessment [APP-189 to APP-196 - 8 documents]. The Project has been designed taking account of future predicted tidal flood levels, including the H++ credible maximum climate change scenario, such that the proposed assets are protected against the 1 in 200-year future credible maximum tidal flood scenario.
RR-WEN-19	RR-067, RR-111, RR-161, RR-300, RR-321	General concerns over environmental damage, pollution and long-term risks to rivers, seas and marine life arising from the Project.	This Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3). sets out how the Project will avoid, reduce, and mitigate effects on the water environment and surrounding area during construction.

Reference	RR references	Summary of issue raised	The Applicant's response
			The Applicant has also undertaken detailed assessment of water quality impacts during operation (longer term effects), supported by a comprehensive range of water quality modelling which considers: • Water quality in Havant Thicket Reservoir (Environmental Statement (ES) Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1). • Water quality in downstream water bodies receiving compensatory flows from the reservoir, including Riders Lane Stream, Hermitage Stream and Langstone Harbour (ES Appendix 19.6 Havant Thicket Reservoir Compensatory Flows water quality modelling [APP-201] and ES Appendix 19.10 Degradation modelling [APP-205]). • Water quality in coastal and transitional waters receiving releases from Eastney Long Sea Outfall (LSO) (ES Appendix 19.5 Eastney LSO dispersion modelling [APP-200] and ES Appendix 19.8 CORMIX Modelling for Chemicals Screened in via the Surface Water Risk Assessment Process [APP-203]). • Releases from the Water Recycling Plant (WRP) SuDS outfall (ES Appendix 19.12 WRP site SuDS dispersion modelling [APP-207]). The results of these detailed studies have been used to inform the assessment presented in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1). This assessment demonstrates that the Project would not result in environmental damage or pollution of rivers, transitional and coastal waters and would not increase the long-term risks to these features, concluding that there will be no adverse effects on freshwater or coastal water quality. Furthermore, the assessments presented in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) and ES Chapter 9 Marine biodiversity (Document reference 6.1, DCO Volume 6, Version 1) draw upon the same evidence base to conclude that there will be no adverse effects on aquatic life supported in the rivers, transitional and coastal habitats.
RR-WEN-20	RR-020	Concerns over severe impacts of the Project on the coastal environment.	The Project does not propose any direct activities in coastal waters, although it will change the composition of the treated effluent that is discharged into the Solent via the existing Eastney LSO. Detailed modelling of water quality in coastal and transitional waters receiving discharges from the Eastney LSO (ES Appendix 19.5 Eastney LSO dispersion modelling [APP-200] and ES Appendix 19.8 CORMIX Modelling for Chemicals Screened in via the Surface Water Risk Assessment Process [APP-203]) has been undertaken. The results of these detailed studies have been used to inform the assessment presented in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1), which concludes that there will be no adverse effects on the coastal environment. The assessment process for the consideration of chemicals in the Long Sea Outfall discharge presented in ES Appendix 19.8 CORMIX Modelling for

Reference	RR references	Summary of issue raised	The Applicant's response
			Chemicals Screened in via the Surface Water Risk Assessment Process [APP-203] followed the EA guidance for surface water pollution risk assessment, which requires a number of screening tests to evaluate which chemicals are at risk of failing their Environmental Quality Standard (EQS). Where this was the case, the parameter was carried forward for modelling in line with this guidance. Model outputs show that the differences in the Solent with respect to Budds Farm WTW discharge between the existing scenario and the operational Project scenario are insignificant (ES Appendix 19.5 Eastney LSO dispersion modelling [APP-200]). With respect to chemicals in the Long Sea Outfall discharge (ES Appendix 19.8 CORMIX Modelling for Chemicals Screened in via the Surface Water Risk Assessment Process [APP-203]), the distance at which the EQS for the parameters screened in has been calculated as being 1-2m from the outfall thus indicating rapid dilution at the outfall location. As the Long Sea Outfall discharge will be rapidly diluted with 2m of the outfall location, there is no pathway for effect on designated sites in the Solent or associated harbours. Given the scale of the predicted changes for the currently consented parameters and distance to EQS for the chemical parameters screened in, the addition of the reject water to the existing discharge would not result in any changes to water quality and changes would not extend into connected water bodies such as Langstone Harbour or the tidally influenced Hermitage Stream. Although the Project does not propose any direct activities in coastal waters, it does propose to cross the transitional (tidal) section of the Hermitage Stream with a buried pipeline and to construct a new outfall for the SuDS at the Water Recycling Plant on the bank of the tidal Hermitage Stream. As discussed in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1), the pipeline will be installed using a trenchless technique and will not therefore impact upon the transitional waters in the tidal Hermitage Stream. ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) also concludes that construction of the SuDS outfall will not result in any significant adverse effects on Hermitage Stream. Modelling of the water quality implications of discharges from the WRP SuDS outfall (ES Appendix 19.12 WRP site SuDS dispersion modelling [APP-207]) demonstrates that the operation of the outfall will not result in significant adverse effects on transitional water quality in the lower Hermitage Stream or adjacent Langstone Harbour.
RR-WEN-21	RR-128, RR-354	Concerns over water quality within Havant Thicket Reservoir arising from bioaccumulation of contaminants and treatment by-products, elevated water temperature and increased salinity.	Water quality modelling has been undertaken to understand the impact of blending recycled and spring water on water quality in Havant Thicket Reservoir (ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1). Reservoir modelling includes the use of a High Rejection Rate Membrane (HRRM) at the WRP and shows that water quality in Havant Thicket Reservoir would be consistent with the definition of 'high' status for a lake water body under the Water Framework Directive (WFD) Directions 2015. Operation of the Project

Reference	RR references	Summary of issue raised	The Applicant's response
			would not, therefore, result in a deterioration in water quality (including impacts on temperature and salinity) in the reservoir. Furthermore, the modelling presented in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1) includes a representation of the accumulation of sediment and a range of substances (including phosphorus, nitrogen, iron, manganese and carbon) in the water column and the interaction of these parameters with the bed sediment. The model also considers the retention time of water Havant Thicket Reservoir over the 12-year simulation period. This analysis indicates that water would remain in Havant Thicket Reservoir for approximately 3 years during the 'classic' operational phase (i.e. prior to the introduction of recycled water), decreasing to a maximum of approximately 1 year during the 'post-WRP' operational phase (i.e. after the introduction of recycled water). This decrease in residence time indicates that the risk of long-term accumulation of contaminants and treatment by-products in the reservoir is likely to be reduced by the Project; the increased throughput of water reduces the risks associated with the far more static conditions associated with Havant Thicket Reservoir during the spring-fed operational phase (i.e. before the introduction of recycled water). The output from the water recycling plant into the reservoir will be subject to an environmental permit, issued by the Environment Agency, which will require the quality of the recycled water to meet the standard specified to ensure there are no unacceptable impacts to the environment. For further information about the relationship between the DCO and the applicable regulatory regimes, please refer to Appendix D and 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).
RR-WEN-22	RR-177	Concern that recycled wastewater stored in Havant Thicket Reservoir could contaminate groundwater and leave a long-term legacy for future generations.	As noted in the response to RR-WEN-21 above, the Applicant has assessed the impacts of the storage within Havant Thicket Reservoir through detailed water quality modelling (ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1). This modelling demonstrates that water quality within Havant Thicket Reservoir would remain consistent with 'high' status 'for a lake water body under the WFD Directions 2015 and would not experience deterioration or accumulation of contaminants. Accordingly, the stored water would not be expected to pose a contamination risk to surrounding groundwater receptors or give rise to adverse long-term legacy effects. The output from the WRP into the reservoir will be subject to an environmental permit, issued by the Environment Agency, which will require the quality of the recycled water to meet the standard specified to ensure there are no unacceptable impacts to the environment. For further information about the relationship between the DCO and the applicable regulatory regimes, please refer to Appendix D and to Appendix F

Reference	RR references	Summary of issue raised	The Applicant's response
			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).
RR-WEN-23	RR-235	Concerns over water environment impacts on Havant Thicket Reservoir, connected streams and coastal ecosystems including Langstone Harbour arising from operational overflows and emergency discharges.	As stated in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1), the Project will not alter the hydrology of Riders Lane Stream or change the magnitude and frequency of compensation flows from Havant Thicket Reservoir, which will remain subject to the conditions of the Impoundment Licence agreed between Portsmouth Water, as the reservoir operator, and the Environment Agency, as the competent authority. The Applicant has undertaken detailed modelling of water quality in Havant Thicket Reservoir (ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1) and downstream water bodies receiving compensatory flows, including Riders Lane Stream, Hermitage Stream and Langstone Harbour (ES Appendix 19.6 Havant Thicket Reservoir Compensatory Flows water quality modelling [APP-201] and ES Appendix 19.10 Degradation modelling [APP-205]. Modelling includes the use of a High Rejection Rate Membrane (HRRM) at the WRP, which demonstrates that water quality in Havant Thicket Reservoir would remain consistent with the definition of 'high' status for a lake water body under the Water Framework Directive (WFD) Directions 2015 and that water quality in downstream receiving water bodies and designated sites would not be adversely affected. The Project would not, therefore, cause significant adverse effects on water quality in either Havant Thicket Reservoir or the downstream water bodies receiving compensatory flows during normal reservoir operation. In addition, as stated in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1), during normal operation the washout valves would be inspected and tested to check that the valves are operational. All source water resulting from the testing of washout valves would be collected directly by a tanker, with no source water discharged to the environment (land or watercourse). This could require the installation of temporary pumping and flexible pipework to connect the tanker to the washout valve. Testing of a washout valve would result in the release of up to approximately 4.5m^3 of source water from the Pipelines, requiring only one tanker. Testing of washouts would be required approximately once every six months. Potential effects arising from washouts have been assessed in Section 19.8 of ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1), which identifies no significant adverse effects on the water environment. ES Chapter 14 Major accidents and disasters [APP-093] presents the assessment of the expected significant effects on the environment deriving from vulnerability of the Project to risks of major accidents and disasters. This includes considering the risk events of pollution from chemicals and major pipe leaks and concludes that the risks of treatment system failure at the WRP or failure of the transfer pipelines are not significant as they are reduced to 'as low as reasonably practicable'. There will be a dual mains supply from

Reference	RR references	Summary of issue raised	The Applicant's response
			independent sub-stations with back-up power generators to ensure continuity of power supply. This will reduce the risk of system failures. In terms of managing emergency discharges, the Operational Environmental Management Plan [APP-422] specifies that the Contractor, once appointed, will prepare an Emergency Response Plan for the operation of the Project to include measures relating to pipe rupture: • The protection measure of pipeline damage, leakage or rupture and access for maintenance during operational stage. The measures include but not limited to the indication of pipeline alignment and provision of proper corridor set back from both sides of pipeline to restrict certain activities that could adversely affect the infrastructure during operation stage. • The measure of high-level process for incident classification with consideration of impact and risk level if the pipe rupture occurs, by developing certain incident identification and escalation plan. This includes details on categorisation of an incident, formation of an incident team, escalation and de-escalation and operation of an incident team. • The information of emergency response procedures during the incident. This would include liaison with blue light authorities for evacuation of affected residents and businesses. In addition, section 4.4 of the Invasive Non-Native Species (INNS) Biosecurity Plan [APP-425] sets out the approach that will be used to manage the risks associated with INNS during emergency incidents, including: • An emergency shutdown of the WRP, resulting in activation of run to waste mode and treated wastewater being released to the Solent through the Eastney LSO. • Emergency drain down of isolated sections of the Havant Thicket Reservoir to Otterbourne WSW pipeline resulting in source water being discharged to the surrounding natural environment (land or water) through the washouts. • Power or equipment failure at Otterbourne WSW resulting in activation of run to waste mode and source water discharging to the sewer network. The management of INNS pathways during emergency incidents will be through the preparation and implementation of an Emergency INNS Management Plan (EIMP) which will be developed by the Contractor, in accordance with the Outline EIMP presented in the INNS Biosecurity Plan [APP-425]. The EIMP will include the following procedures and will be developed by the Contractor prior to any works or emergency incidents taking place: • Pre-incident procedure for releasing and managing water during an emergency incident. • Procedure for the rapid assessment and identification of INNS. • Procedure for containment and eradication strategies.

Reference	RR references	Summary of issue raised	The Applicant's response
			• Procedure for regular monitoring and follow-up. • Procedure for communication and reporting. On the basis of the emergency management measures set out in the Operational Environmental Management Plan [APP-422] and the INNS Biosecurity Plan [APP-425], impacts from emergency discharges are not therefore expected.
RR-WEN-24	RR-354	Concerns that a changed reservoir operating regime, with less spring water pumped to Havant Thicket Reservoir and reduced residence time, will reduce the nitrate benefit previously anticipated for Langstone Harbour SPA and SAC.	The Applicant has undertaken detailed modelling of water quality in Havant Thicket Reservoir (ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1)). This considered a range of different operational scenarios. These scenarios include variations in the proportion of water from different inputs and variations in reservoir yield, to simulate a range of drought conditions and other potential operational scenarios. The results of these scenarios are compared to the baseline operational scenario, which concludes that changes in water quality within the Havant Thicket Reservoir and in withdrawal water (i.e., water released as compensatory flow into Riders Lane Stream) between the scenarios are small. The Applicant has also undertaken detailed modelling of water quality in downstream water bodies receiving compensatory flows, including Riders Lane Stream, Hermitage Stream and Langstone Harbour (ES Appendix 19.6 Havant Thicket Reservoir Compensatory Flows water quality modelling [APP-201] and ES Appendix 19.10 Degradation modelling [APP-205]). This modelling, which includes the use of a HRRM at the WRP, demonstrates that water quality in downstream water bodies and designated sites that would receive compensatory flows from the reservoir (i.e. Riders Lane Stream, Hermitage Stream and Langstone Harbour) would not be adversely affected. In addition, Appendix 19.8 Nutrient Assessment [APP-202] confirms that the Project will be compliant with the Habitats and Species Regulations 2017, with regard to NE nutrient neutrality guidance. The Nutrient Assessment concludes that, on the basis of nutrient management measures embedded within the Project, no additional mitigation would be required to achieve nutrient neutrality during the construction and operational phases. The nitrate benefit previously forecast will not therefore be affected by the Project.
RR-WEN-25	RR-354	Suggestions that a precautionary approach should be applied and the scheme should not proceed until the potential water environment impacts on Havant Thicket Reservoir, Langstone Harbour and the Solent are fully understood.	The Applicant has undertaken detailed assessment of water quality impacts, supported by a comprehensive range of water quality modelling which considers: • Water quality in Havant Thicket Reservoir (ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1). • Water quality in downstream water bodies receiving compensatory flows from the reservoir, including Riders Lane Stream, Hermitage Stream and Langstone Harbour (ES Appendix 19.6 Havant Thicket Reservoir

Reference	RR references	Summary of issue raised	The Applicant's response
			Compensatory Flows water quality modelling [APP-201] and ES Appendix 19.10 Degradation modelling [APP-205]). • Water quality in coastal and transitional waters receiving discharges from Eastney LSO (ES Appendix 19.5 Eastney LSO dispersion modelling [APP-200] and ES Appendix 19.8 CORMIX Modelling for Chemicals Screened in via the Surface Water Risk Assessment Process [APP-203]). • Discharges from the WRP SuDS outfall (ES Appendix 19.12 WRP site SuDS dispersion modelling [APP-207]). The results of these detailed studies have been used to inform the assessment presented in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1), which concludes that there will be no adverse effects on freshwater or coastal water quality and associated environments. The output from the water recycling plant will be subject to an environmental permit, issued by the Environment Agency. The Environment Agency, as expert regulator, will determine the parameters for the discharge that will be secured in the environmental permit to ensure that there are no unacceptable impacts to the environment. In accordance with paragraph 3.8.3 of the National Policy Statement for Water Resources Infrastructure, the DCO does not seek to duplicate this regulatory regime. For further information about the relationship between the DCO and the applicable regulatory regimes, please refer to Appendix D and 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).
RR-WEN-26	RR-354	Concerns over the control of remineralisation, salinity and temperature of discharges from the Project.	As described in the response to RR-WEN-25, the Applicant has undertaken detailed water quality modelling that demonstrates that the water environment will not be adversely affected by discharges from the Project, which includes the remineralisation process and salinity and temperature parameters. ES Chapter 14 Major accidents and disasters [APP-093] identifies a range of measures, including remote monitoring and control systems, emergency power provision, continuous staffing of the Water Recycling Plant and emergency response procedures, which are intended to reduce risks to as low as reasonably practicable. These measures are secured through the Operational Environmental Management Plan [APP-422], which is secured by a requirement in Schedule 2 to the draft DCO [APP-023][APP-023]. The Applicant therefore considers that the residual risks associated with the operation of the Project, including its interaction with Havant Thicket Reservoir, have been appropriately assessed and mitigated. The release of recycled water into Havant Thicket Reservoir and reject water from the WRP into the Solent would be monitored in accordance with regulations and standards set and enforced by the Environment Agency under an environmental permit. The environmental permit would specify the strict requirements necessary to prevent potential impacts on the environment and achieve water quality standards.

Reference	RR references	Summary of issue raised	The Applicant's response
			For further information about the relationship between the DCO and the applicable regulatory regimes, please refer to Appendix D and 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).
RR-WEN-27	RR-354	Concerns over the risk of drilling fluid frac-out or blow-out from tunnel construction beneath the Hermitage Stream reaching the sea floor.	Section 19.8 of ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) assesses the potential effects of the construction of the Pipelines between Budds Farm Wastewater Treatment Works and the WRP site on the tidal reach of Hermitage Stream. The assessment considers that the Pipelines would be installed using a trenchless technique that would require the use of drilling fluids, which has a low potential risk of the accidental release of fine sediment and contaminants into the water body in the event of a breakout. However, construction will 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). This includes a suite of measures to limit and control the mobilisation of potential contaminants beyond the working areas and ensure that any accidental releases are managed appropriately. In particular, environmental measure WE14, in Table 5-1 of the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3) states that a Drilling Fluid Management Plan (DFMP) will be developed by the Contractor and agreed with the Environment Agency, Natural England and the Marine Management Organisation prior to commencement of trenchless construction activities requiring the use of drilling fluids. The DFMP will document how risks of fluid breakouts will be reduced, and in the event of a breakout, how that will be managed and mitigated to reduce environmental effects. The DFMP will include measures to: • Reduce the risk of a breakout occurring. • Monitor and communicate a breakout. • Ensure operations cease one a breakout is reported. • Contain a breakout. • Remediate released drilling fluids. With these measures in place, the assessment concludes that the risk of a breakout will be adequately controlled and that likely adverse effects on water quality in Hermitage Stream will not occur.

Table 2-40 Summary of issues raised on the theme of water quality at Havant Thicket Reservoir and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-WQH-01	RR-266	Concerns over the effectiveness off proposed phosphorus mitigation at the Water Recycling Plant and the effect on Havant Thicket Reservoir, and the Planning Inspectorate's identified inconsistency regarding how phosphorus treatment assumptions are represented in the HRA modelling.	The Applicant has undertaken a comprehensive range of water quality modelling which considers: • Water quality in Havant Thicket Reservoir (Environmental Statement (ES) Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1). • Water quality in downstream water bodies receiving compensatory flows from the reservoir, including Riders Lane Stream, Hermitage Stream and Langstone Harbour (ES Appendix 19.6 Havant Thicket Reservoir Compensatory Flows water quality modelling [APP-201] and ES Appendix 19.10 Degradation modelling [APP-205]). • Water quality in coastal and transitional waters receiving releases from Eastney LSO (ES Appendix 19.5 Eastney LSO dispersion modelling [APP-200] and ES Appendix 19.8 CORMIX Modelling for Chemicals Screened in via the Surface Water Risk Assessment Process [APP-203]). • Releases from the WRP SuDS outfall (ES Appendix 19.12 WRP site SuDS dispersion modelling [APP-207]). The results of these detailed studies provide a coherent evidence base that has been used to inform the assessments presented in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1), ES Chapter 9 Marine biodiversity (Document reference 6.1, DCO Volume 6, Version 1), ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1), ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1) and the Habitats Regulations Assessment [APP-053]. The Applicant acknowledges that, as described in Tables 4.3 - 4.7 and 4.10 in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1), there are differences in the chemistry of the spring and recycled water. As well as being less alkaline, the recycled water is predicted to contain lower concentrations of total phosphorus, nitrate, calcium, sulphate and Dissolved Organic Carbon (DOC) than the spring water. Other parameters, including ammonium, sodium, chloride, iron and manganese, are similar. The assessment presented in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) demonstrates that the introduction of recycled water into Havant Thicket Reservoir would result in a small improvement in water quality, reflecting the reductions in parameters such as phosphorus, nitrate and DOC described above. The assessment concludes that the treatment measures incorporated into the design of the Water Recycling Plant (WRP), including the High Rejection Rate Membrane (HRRM) which is an established technology for phosphorus removal, would be sufficient to prevent significant adverse effects on water quality in the reservoir.

Reference	RR references	Summary of issue raised	The Applicant's response
			The Applicant notes the comment regarding the consistency of phosphorus treatment assumptions. The input concentrations of phosphorus and other chemical parameters for the reservoir water quality modelling presented in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1) were based upon estimates of the performance of the WRP with a HRRM. These are presented in section 4.3.2.2.2 and Table 4.5 in ES Appendix 19.11 (Document reference 6.2, DCO Volume 6, Version 1). The predicted withdrawal water quality envelope from ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1) was used to provide input concentrations for the compensatory flow modelling presented in ES Appendix 19.6 Havant Thicket Reservoir Compensatory Flows water quality modelling [APP-201]. The phosphorus concentrations were therefore informed by the same assumptions as the reservoir water quality modelling presented in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1). On this basis, the Applicant considers that phosphorus has been considered consistently in the assessment.
RR-WQH-02	RR-018, RR-040, RR-058, RR-085, RR-128, RR-235, RR-266, RR-306, RR-354, RR-355	Concerns that the introduction of recycled effluent represents a fundamental repurposing of the Havant Thicket Reservoir from a chalk spring fed reservoir to a blended/environmental buffer, altering its consented character and water quality.	Havant Thicket Reservoir is a separate project which is being delivered by Portsmouth Water under a separate planning permission. The initial Havant Thicket Reservoir proposal, which was approved by Havant Borough Council and East Hampshire District Council, was for a spring-fed reservoir to enable the supply of water to the Applicant in times of drought. The Project seeks to make the best use of Havant Thicket Reservoir by using recycled water to supplement the quantity of water resources available. The Development Consent Order (DCO) application submitted by the Applicant seeks to change the use of Havant Thicket Reservoir to allow the storage of recycled water. The Applicant held consultations on the Project in 2022, 2024, 2025, and 2026 setting out the intention to use Havant Thicket Reservoir to store recycled water. This proposed change has been assessed in the Environmental Statement. Tables 4.2 – 4.7 and 4.10 in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1) demonstrate that the chemistry of the recycled water is more similar to that of the spring water than that of water from the headwaters of Riders Lane Stream. However, the Applicant acknowledges that, as described in Tables 4.3 – 4.7 and 4.10 in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1), there are differences in the chemistry of the spring and recycled water. As well as being less alkaline, the recycled water is predicted to contain lower concentrations of total phosphorus, nitrate, calcium, sulphate and Dissolved Organic Carbon (DOC) than the spring water. Other parameters, including ammonium, sodium, chloride, iron and manganese, are predicted to be similar. The assessment presented in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) therefore demonstrates that the introduction of

Reference	RR references	Summary of issue raised	The Applicant's response
			recycled water into Havant Thicket Reservoir would result in a small improvement in water quality, reflecting the reductions in parameters such as phosphorus, nitrate and DOC described above. The assessment concludes that the treatment measures incorporated into the design of the Water Recycling Plant would be sufficient to prevent significant adverse effects on water quality in the reservoir. The predicted changes in water quality parameters from the operation of the Project are not expected to result in any adverse impacts on water quality or any change to the water body status within Havant Thicket Reservoir. Therefore, as demonstrated in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1), the ecological benefits previously proposed at Havant Thicket Reservoir are not affected by the Project. On this basis, the Applicant considers that it has demonstrated that the introduction of recycled water would not fundamentally alter the water quality and consented character of Havant Thicket Reservoir.
RR-WQH-03	RR-018, RR-306, RR-354	Concerns over the change in operating regime from seasonal fill and drawdown to continuous year-round blending, and the resulting water quality and biodiversity implications.	The modelling presented in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1) considered a range of different operational scenarios. These scenarios include variations in the proportion of water from different inputs and variations in reservoir yield, to simulate a range of drought conditions and other potential operational scenarios. The results of these scenarios are compared to the baseline operational scenario, which concludes that changes in water quality within the Havant Thicket Reservoir and in withdrawal water (e.g. water released as compensatory flow into Riders Lane Stream) between the scenarios are small. Furthermore, the modelling also predicts that changes to the way in which the Havant Thicket Reservoir is operated (in terms of the volume and timing of inputs and withdrawals) reduces the residence time of water in the reservoir. Water would remain in the reservoir for approximately 3 years during the 'classic' operational phase (e.g. prior to the introduction of recycled water), decreasing to a maximum of approximately 1 year during the 'post-WRP' operational phase (e.g. after the introduction of recycled water). This reflects the higher continuous inflows and withdrawals associated with the operation of the Water Recycling Plant. This decrease in residence time indicates that the risk of long-term accumulation of contaminants in the reservoir is likely to be reduced by the Project. ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1) compares these results to water body status thresholds established under the Water Framework Directive (Standards and Classification) Directions (England and Wales) 2015 (WFD Directions 2015). The baseline scenario results in water quality that is equivalent to High status for all parameters (with the exception of DO in a deep pocket in the south basin). The alternative scenarios produce similar results, although the Ecological Quality Ratio for Phytoplankton Biomass ($EQR_{Chl\text{-}a}$) is

Reference	RR references	Summary of issue raised	The Applicant's response
			reduced slightly to Good status and Dissolved Oxygen (DO) in the south basin increases to Good status. The Applicant therefore concludes that the addition of recycled water and the change in the way in which Havant Thicket Reservoir is operated is not predicted to adversely affect water quality or biodiversity.
RR-WQH-04	RR-018, RR-072, RR-084, RR-128, RR-129, RR-153, RR-161, RR-177, RR-201, RR-248, RR-249, RR-288, RR-294, RR-325, RR-354	Concerns over the presence, accumulation and bioaccumulation of PFAS, pharmaceuticals, endocrine disruptors, trace organics, treatment by-products and other contaminants of emerging concern (CECs) in the Havant Thicket Reservoir water, sediments and biota.	As stated in section 19.8 of ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1), the Applicant has undertaken an extensive programme of monitoring of a wide range of Contaminants of Emerging Concern (CECs) in the treated wastewater from Budds Farm Wastewater Treatment Works (WTW) (e.g. a representation of influent water quality to the Water Recycling Plant (WRP) and water treated in its pilot treatment plant at Budds Farm WTW. The Applicant's monitoring included a range of potential CECs, with more than 400 substances selected to reflect global best practice for the development of water recycling schemes and risks identified from numerous trade licences in the catchment that contributes wastewater to Budds Farm WTW. These substances included: • Pharmaceuticals and Personal Care Products (PPCPs): Organic contaminants sourced from pharmaceutical products and their metabolites, cosmetics, soaps and shampoos, which can be found in trace levels in wastewater. • Industrial chemicals: Substances such as per- and poly-fluoroalkyl substances (PFAS), polycyclic aromatic hydrocarbons (PAHs), volatile organic compounds (VOCs) and inorganic contaminants (including some trace metals). Although some specific compounds within these broad categories of chemicals have an established Environmental Quality Standard (EQS) (including some metals, PAHs and several PFAS compounds, this is not the case for the majority of these substances. • Agricultural chemicals: Substances such as pesticides and fertilizers that can be found in surface water runoff. The pilot plant included a Full Advanced Treatment process, comprising integrated membranes followed by an ultraviolet and advanced oxidation process. Although this does not include the Granular Activated Carbon (GAC) and remineralisation processes that will be present within the WRP, the pilot plant included the multi-barrier treatment process that will be primarily responsible for the effective removal of contaminants from the treated wastewater. Because some contaminants would also be removed by the GAC process, the results from the pilot plant therefore represent an underestimate of the performance of the full WRP and are therefore considered to represent the worst case. The results of the pilot plant investigation are described in an independent review produced by the University of Brighton (Mayor-Smith) (2024) [1], as referenced in ES Chapter 19 Water environment (Document reference 6.1,

Reference	RR references	Summary of issue raised	The Applicant's response
			DCO Volume 6, Version 1). The results of the investigation into pilot plant performance indicate that the treatment process resulted in a considerable increase in water quality, with the concentration of CECs decreasing after passing through the pilot plant. Over 60% of the CECs measured in the WRP influent decreased to below the limits of detection in the water that had passed through the WRP, with the largest reductions identified for a range of pharmaceuticals, personal care products and pesticides. The results of the pilot study clearly demonstrate that CEC concentrations in the recycled water are considerably lower than those in the treated wastewater from Budds Farm WTW that is currently released under a permitted discharge into the Solent via Eastney Long Sea Outfall. This suggests that any CECs remaining in the WRP output would be present in extremely low concentrations. Significant adverse effects on water quality and biota from CECs are considered unlikely, particularly given that the pilot plant data does not represent the full treatment process that would be in place at the WRP (which would also include a GAC treatment stage that would also remove contaminants from the recycled water).
RR-WQH-05	RR-018, RR-129, RR-153, RR-248, RR-288, RR-354, AS-033	Concerns over the regulatory gap, noting the absence of UK Environmental Quality Standards for PFAS and other CECs and the limits this places on the environmental permit as a safeguard.	Whilst there are currently limited EQS for the majority of PFAS and other CECs, the Applicant is engaging with the Environment Agency's National Permitting Service to ensure that these substances are robustly considered as part of the discharge consent application process. Further information on the pilot plant investigation is provided in the Applicant's response to RR-WQH-04.
RR-WQH-06	RR-266	Concern that the environmental assessment relies on average or normal operating scenarios and does not adequately model worst-case conditions (including continuous sweetening flow, drought operation, maximum recycled water input, reduced spring inflows and prolonged drought followed by recovery).	The modelling presented in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1) considered a range of different operational scenarios. These scenarios include variations in the proportion of water from different inputs and variations in reservoir yield, to simulate a range of drought conditions and other potential operational scenarios. The results of these scenarios are compared to the baseline operational scenario, which concludes that changes in water quality within the reservoir and in withdrawal water (e.g. water released as compensatory flow into Riders Lane Stream) between the scenarios are small. The Applicant is therefore confident that the assessment presented in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) is representative of likely water conditions in the reservoir.
RR-WQH-07	RR-084, RR-354, RR-355	Concerns that monitoring alone is not sufficient mitigation, as detection of contamination in the Havant Thicket Reservoir would occur after harm has already taken place and cannot be reversed or flushed away.	The Applicant acknowledges this comment. The assessment presented in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) demonstrates that the operation of the Project would not result in significant adverse effects on water quality in Havant Thicket Reservoir. Post-construction monitoring of surface and groundwater receptors is described in section 4.4 of ES Appendix 19.9 Outline Water Monitoring Plan [APP-204]. Monitoring will be undertaken in Havant Thicket Reservoir, with

Reference	RR references	Summary of issue raised	The Applicant's response
			determinands, monitoring locations and monitoring frequencies agreed with the Environment Agency as part of the consenting process. The following suite of parameters is currently proposed: • Basic water quality parameters such as temperature, pH, conductivity, Dissolved Oxygen, Biochemical Oxygen Demand, Dissolved Organic Carbon, alkalinity and turbidity. • Total phosphorus, phosphate and reactive orthophosphate. • Total nitrogen, Dissolved Inorganic Nitrogen, ammoniacal nitrogen, ammonium, nitrate and nitrite. In situ monitoring will be undertaken using a portable multi-parameter instrument (e.g. a YSI multi-probe) and through laboratory analysis from selected locations. The multi-stage water recycling process would feature numerous safeguards, including continuous monitoring, to ensure that in the unlikely event of a significant deviation in expected water quality can be rectified through partial or full system shutdowns or diversions. The release of recycled water into HTR would be monitored in accordance with regulations and standards set out and enforced by the Environment Agency.
RR-WQH-08	RR-018, RR-084, RR-129, RR-153, RR-354, RR-355	Concerns that the confined nature of the Havant Thicket Reservoir creates a heightened risk of contaminant accumulation compared with a flowing watercourse.	The modelling presented in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1) includes a representation of the accumulation of sediment and a range of substances (including phosphorus, nitrogen, iron, manganese and carbon) in the water column and the interaction of these parameters with the bed sediment. The model also considers the retention time of water in the reservoir over the 12-year simulation period. This analysis indicates that water would remain in the reservoir for approximately 3 years during the 'classic' operational phase (e.g. prior to the introduction of recycled water), decreasing to a maximum of approximately 1 year during the 'post-WRP' operational phase (e.g. after the introduction of recycled water). This reflects the higher continuous inflows and withdrawals associated with the operation of the Water Recycling Plant. This decrease in residence time indicates that the risk of long-term accumulation of contaminants in the reservoir is likely to be reduced by the Project; the increased throughput of water reduces the risks associated with the far more static conditions associated with the reservoir during the spring-fed operational phase.
RR-WQH-09	RR-107, RR-300, RR-354	Concerns over increased risk of algal blooms, eutrophication and associated odour and amenity impacts arising from recycled effluent discharge to the Havant Thicket Reservoir.	The assessment presented in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) was informed by extensive water quality modelling presented in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1). This demonstrates that:

Reference	RR references	Summary of issue raised	The Applicant's response
			• Concentrations of nitrogen and phosphorus compounds are forecast to be low and representative of high-quality water. • DO concentrations are forecast to be representative of good quality, well-oxygenated water in the reservoir, which reflects the use of a bubbler system to encourage water circulation and mixing. • The Ecological Quality Ratio for Phytoplankton Biomass (EQR_{Chl-a}) is forecast to be consistent with good water quality. This means that, overall, the treatment measures at the WRP site (as described in ES Chapter 3 Description of the Proposed Development [APP-082]) mean that the proposed releases from the WRP are predicted to result in limited changes in water quality within Havant Thicket Reservoir. The Project will not therefore result in increased incidence of algal blooms, eutrophication or odour in Havant Thicket Reservoir.
RR-WQH-10	RR-085, RR-354	Concerns over the standard of remineralisation of recycled effluent and whether the geochemistry will match that of the chalk spring water.	Remineralisation is an essential part of the water recycling treatment process to add essential minerals back into the water. This will protect downstream infrastructure and ensure that the overall water quality characteristics and health benefits of the source water transferred to and stored in Havant Thicket Reservoir is not significantly different from the current water quality profile of water treated at Otterbourne Water Supply Works (Otterbourne WSW) prior to supply. The Applicant acknowledges that, as described in Tables 4.3 to 4.7 and 4.10 of ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1) there are differences in the chemistry of the source spring water and recycled water. As well as being less alkaline, the recycled water is predicted to contain lower concentrations of total phosphorus, nitrate, calcium, sulphate and dissolved organic carbon (DOC) than the spring water. Other parameters, including ammonium, sodium, chloride, iron and manganese, are similar. The assessment presented in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) demonstrates that the introduction of recycled water into Havant Thicket Reservoir would result in a small improvement in water quality, reflecting the reductions in parameters such as phosphorus, nitrate and DOC described above. The assessment concludes that the treatment measures incorporated into the design of the Water Recycling Plant (WRP), including the High Rejection Rate Membrane (HRRM) as an established technology for phosphorus removal, would be sufficient to prevent significant adverse effects on water quality in the reservoir. The release of recycled water into Havant Thicket Reservoir and reject water from the WRP into the Solent would be monitored in accordance with regulations and standards set and enforced by the Environment Agency under an environmental permit.

Reference	RR references	Summary of issue raised	The Applicant's response
			The environmental permit would specify the strict requirements necessary to prevent potential impacts on the environment and achieve water quality standards.
RR-WQH-11	RR-129, RR-354	Concerns over saline intrusion at Budds Farm WTW and the resulting salinity of recycled effluent discharged to the freshwater Havant Thicket Reservoir.	The modelling presented in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1) considers the salinity of water in the reservoir. The model assumes that the salinity of the spring water input to the reservoir is very low, at 0.12 psu. However, salinity in the reservoir during the 'classic' operational phase (e.g. prior to the introduction of recycled water) ranges between approximately 0.21 – 0.26 psu. This reflects the influence of contributions from rainfall, flows from the headwaters of Riders Lane Stream, evaporation processes and the retention of dissolved ions within the reservoir. During the 'post-WRP' operational phase (e.g. following the introduction of recycled water), the simulated salinity range increases slightly to 0.27 – 0.30 psu. This reflects slightly higher concentrations of ions such as sodium and chloride in the recycled water in comparison to the spring water. Freshwater systems are typically considered to have a salinity of <5 psu. Salinity is not routinely monitored in freshwaters, although proxies such as Electronic Conductivity are frequently reported. Table 4.2 in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1) reports median EC in the headwaters of Riders Lane Stream as 176 µS/cm, which translates to approximately 0.11 psu when multiplied by a conversion factor of 0.625 (as described in Table 4.10). Monitoring reported in Table 19-19 in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) identifies a slightly higher median salinity in Riders Lane Stream of approximately 0.20 psu (converted from median EC of 319 µS/cm using the 0.625 factor used in the reservoir modelling), while monitoring in Hermitage Stream (of which Riders Lane Stream is a tributary) reported in Table 19-16 identified median salinity as 0.34 psu (calculated from a median salinity of 535 µS/cm). Furthermore, baseline salinity measurements from The Solent reported in Tables 19-44 and 19-45 in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) indicate that local seawater has a mean salinity of approximately 33 – 34 psu. The small increase in salinity predicted in Havant Thicket Reservoir (up to approximately 0.27 – 0.30 psu) following the release of recycled water is therefore well within the range normally expected for freshwater systems, and is less saline that observed locally in Hermitage Stream. On this basis, changes in salinity are not considered to result in significant adverse effects on water quality or ecology in the reservoir.
RR-WQH-12	RR-129, RR-346, RR-354	Concerns over the temperature increase of recycled effluent (approximately 4–5°C above the reservoir) and its impact on reservoir ecology.	Water quality modelling has been undertaken to understand the impact of blending recycled and spring water on water quality in Havant Thicket Reservoir (ES Appendix 19.11 Havant Thicket Reservoir water quality

Reference	RR references	Summary of issue raised	The Applicant's response
			modelling (Document reference 6.2, DCO Volume 6, Version 1). This shows that, during normal operating scenarios, water quality in Havant Thicket Reservoir would be consistent with the definition of 'High' status for a lake water body under the WFD Directions 2015. Operation of the Project would not, therefore, result in a deterioration in water quality (including impacts on temperature) in the reservoir. The modelled reservoir water quality time-series data do not show a noticeable step change in either surface or bottom water temperatures following the introduction of recycled water to the reservoir, with the magnitude and pattern of seasonal temperature variability also remaining unchanged during the post-WRP operation phase compared to the classic operation phase. While a localised temperature increase may occur in the immediate vicinity of the recycled water discharge point, this small-scale effect is not captured by the reservoir-scale model. However, given the modest size of the reservoir (approximately 1.5 km at its widest point), horizontal water quality variability within the main water body is predicted to be very low. Consequently, any warmer recycled water is expected to mix rapidly with the receiving water and dissipate quickly, with temperatures equilibrating towards ambient reservoir conditions over a short distance from the discharge location. As a result, no discernible reservoir-wide temperature effect is predicted and no significant temperature-related effects on reservoir ecological receptors are anticipated in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) or ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1).
RR-WQH-13	RR-225, RR-235, RR-264, RR-266, RR-306, RR-326, RR-354	Concerns over ecological and biodiversity impacts on Havant Thicket Reservoir, including loss of the unique chalk spring fed habitat, long-term functional decline of wetland and bird habitats, and reduction in promised biodiversity net gain.	The Project seeks to make the best use of Havant Thicket Reservoir by using recycled water to supplement the quantity of water resources available. Tables 4.2 – 4.7 and 4.10 in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1) demonstrate that the chemistry of the recycled water is more similar to that of the spring water than that of water from the headwaters of Riders Lane Stream. However, the Applicant acknowledges that, as described in Tables 4.3 – 4.7 and 4.10 in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1), there are differences in the chemistry of the spring and recycled water. The assessment presented in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) demonstrates that the introduction of recycled water into Havant Thicket Reservoir would result in a small improvement in water quality, reflecting the reductions in parameters such as phosphorus and nitrate. The assessment concludes that the treatment measures incorporated into the design of the Water Recycling Plant would be sufficient to prevent significant adverse effects on water quality or biodiversity in the reservoir. The Project will not result in any direct physical impacts on the retained wetland on the northern shore of Havant Thicket Reservoir, or the headwaters of Riders Lane Stream that drain into the wetland from Havant Thicket. The Applicant notes that although a short length of Riders Lane Stream and its

Reference	RR references	Summary of issue raised	The Applicant's response
			tributaries will be lost within the reservoir footprint under Portsmouth Water's ongoing reservoir development, the extent of these losses will not be increased by the Project.
RR-WQH-14	RR-354	Concerns over water quality risks to the retained wetland on the northern shore of the Havant Thicket Reservoir from mixed water containing recycled effluent.	Water movement between the main body of the reservoir and the wetland area will be constrained by the five wetland control structures, with the wetland's water quality influenced primarily by stream inflows from the north and wetland processes rather than reservoir conditions. Any water exchanged with the reservoir would comprise only a small component of the wetland water balance. Accordingly, there is no reason to expect the introduction of recycled water to the main body of the reservoir to materially influence water quality within the wetland and, consequently, its ecological condition. Tables 4.2 – 4.7 and 4.10 in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1) demonstrate that the chemistry of the recycled water is more similar to that of the spring water than that of water from the headwaters of Riders Lane Stream. However, the Applicant acknowledges that, as described in Tables 4.3 – 4.7 and 4.10 in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1), there are differences in the chemistry of the spring and recycled water. As well as being less alkaline, the recycled water is predicted to contain lower concentrations of total phosphorus, nitrate, calcium, sulphate and DOC than the spring water. Other parameters, including ammonium, sodium, chloride, iron and manganese, are similar. The assessment presented in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) demonstrates that the introduction of recycled water into Havant Thicket Reservoir would result in a small improvement in water quality, reflecting the reductions in parameters such as phosphorus, nitrate and DOC described above. The assessment concludes that the treatment measures incorporated into the design of the WRP would be sufficient to prevent significant adverse effects on water quality in Havant Thicket Reservoir. This means that habitats within Havant Thicket Reservoir would not be adversely affected by the Project.
RR-WQH-15	RR-354	Concerns that seasonally fluctuating water levels and biodiversity benefits at the Havant Thicket Reservoir will be compromised by more frequent and extreme drawdown events under the new operating regime.	As the operator of Havant Thicket Reservoir, Portsmouth Water will remain in control of drawdown events. Extreme drawdown events will be limited by the Havant Thicket water quality envelope with Portsmouth Water. Havant Thicket Reservoir has not yet been constructed and, therefore, there is no existing reservoir ecosystem or established species assemblage that would be adversely affected by a change to more frequent or extensive drawdown. As only a relatively short period, if any, of Portsmouth Water operation is anticipated before the joint operating regime with the Applicant commences, it is considered unlikely that a substantially different ecological community would become established under the initial operating conditions. Water-level fluctuation and periodic drawdowns are inherent features of an operational water-supply reservoir and the reservoir's aquatic and marginal communities

Reference	RR references	Summary of issue raised	The Applicant's response
			would be expected to develop in response to these conditions, favouring habitats and species capable of tolerating fluctuating water levels and periodic exposure. 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) include an assessment of the impacts associated with storing recycled water in Havant Thicket Reservoir. These assessments conclude that the predicted changes in water quality parameters from the operation of the Project are not expected to result in any adverse changes to water quality or any change to the water body status within Havant Thicket Reservoir. Therefore, the ecological benefits previously proposed at Havant Thicket Reservoir are not affected by the Project.
RR-WQH-16	RR-018, RR-129, RR-354	Concerns that the Applicant's water quality modelling addresses only traditional parameters and does not model CECs, persistent chemicals or accumulation over time in the Havant Thicket Reservoir.	The water quality modelling presented in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1) considered a range of water quality parameters that have an EQS under the Water Framework Directive (Standards and Classification) Directions (England and Wales) 2015. As stated in the response to RR-WQH-05, the Applicant can confirm that it is engaging with the Environment Agency's National Permitting Service to ensure that Contaminants of Emerging Concern (CECs) are robustly considered as part of the discharge consent application process. Further information on the investigation into CECs in recycled water from the pilot plant is provided in the Applicant's response to RR-WQH-04.
RR-WQH-17	RR-354	Concerns over the screening methodology used to exclude contaminants from modelling, including the source, transparency and manipulation of the pilot plant data.	The Applicant acknowledges that there are a range of substances for which an EQS has not yet been developed and which are therefore not considered explicitly in the Environment Agency's surface water risk assessment process. The Applicant is currently working with the Environment Agency to ensure that risks associated with substances without an EQS are assessed as part of the environmental permitting process. The Applicant has undertaken an extensive programme of monitoring of a wide range of CECs in the final treated effluent from Budds Farm WTW, including a representation of influent water quality to the WRP and water treated in its pilot treatment plant at Budds Farm WTW. The results of the investigation into pilot plant performance indicate that the Full Advanced Treatment process resulted in a considerable increase in water quality, with the concentration of CECs decreasing after passing through the pilot plant. This suggests that releases from the WRP into Havant Thicket Reservoir and downstream water bodies (Riders Lane Stream, Hermitage Stream and Langstone Harbour) would, as a worst case, contain extremely low concentrations of the CECs measured by the Applicant or independently recorded in Langstone Harbour. Significant adverse effects on water quality and biota from CECs are therefore considered unlikely, particularly given that the pilot plant data does not represent the full treatment process that would be in place at the WRP.

Reference	RR references	Summary of issue raised	The Applicant's response
			The results of the pilot plant investigation are described in an independent review produced by the University of Brighton (Mayor-Smith (2024) [1], as referenced in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1).
RR-WQH-18	RR-266, RR-355	Concerns that climate change, drought conditions and maximum recycled water input scenarios will reduce dilution and concentrate contaminants in the Havant Thicket Reservoir.	The modelling presented in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1) considered a range of different operational scenarios. These scenarios include variations in the proportion of water from different inputs and variations in reservoir yield, to simulate a range of drought conditions and other potential operational scenarios. The results of these scenarios are compared to the baseline operational scenario, which concludes that changes in water quality within the reservoir and in withdrawal water (e.g. water released as compensatory flow into Riders Lane Stream) between the scenarios are small. The Applicant is therefore confident that the assessment presented in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) is representative of a range of likely water conditions in Havant Thicket Reservoir (including drought and other operational scenarios considered in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1)).
RR-WQH-19	RR-018, RR-287, RR-354	Comments on the nutrient, geochemical and pollution risk differences between recycled effluent inputs and the natural chalk spring water/woodland catchment feeding the Havant Thicket Reservoir.	The Applicant acknowledges that there are differences between the chemistry of chalk spring water and the chemistry of recycled water. However, it is important to note that there are considerable differences between the chemistry of the spring water and the chemistry of the water from the headwaters of Riders Lane Stream. As described in Tables 4.2, 4.3 and 4.4 in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1), the spring water is typical of high-alkalinity chalk groundwater, while the stream water is relatively more acidic, with higher concentrations of organic matter, suspended solids and potential contaminants such as metals. In contrast, the chemistry of the recycled water is much closer to that of the spring water (as described in Tables 4.3 – 4.7 and 4.10 in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1). However, the Applicant also notes that, as described in Tables 4.3 – 4.7 and 4.10 in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1), there are differences in the chemistry of the spring and recycled water, including nutrients and other potential contaminants. As well as being less alkaline, the recycled water is predicted to contain lower concentrations of nutrients (total phosphorus, nitrate), calcium, sulphate and DOC than the spring water. Other parameters, including ammonium, sodium, chloride, iron and manganese, are similar. The assessment presented in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) demonstrates that the introduction of recycled water into Havant Thicket Reservoir would result in a small

Reference	RR references	Summary of issue raised	The Applicant's response
			improvement in water quality, reflecting the reductions in parameters such as phosphorus, nitrate and DOC described above. The assessment concludes that the treatment measures incorporated into the design of the Water Recycling Plant would be sufficient to prevent significant adverse effects on water quality in Havant Thicket Reservoir.
RR-WQH-20	RR-018, RR-266	Concerns that the Outline Water Monitoring Plan does not monitor water quality and ecological parameters within the Havant Thicket Reservoir itself.	Post-construction monitoring of surface and groundwater receptors, including Havant Thicket Reservoir, is described in section 4.4 of ES Appendix 19.9 Outline Water Monitoring Plan [APP-204]. Monitoring will be undertaken in Havant Thicket Reservoir, with determinands, monitoring locations and monitoring frequencies agreed with the Environment Agency as part of the environmental permitting process for the Applicant's discharge into the reservoir. The following suite of parameters is currently proposed: • Basic water quality parameters such as temperature, pH, conductivity, Dissolved Oxygen, Biochemical Oxygen Demand, Dissolved Organic Carbon, alkalinity and turbidity. • Total phosphorus, phosphate and reactive orthophosphate. • Total nitrogen, Dissolved Inorganic Nitrogen, ammoniacal nitrogen, ammonium, nitrate and nitrite. In situ monitoring will be undertaken using a portable multi-parameter instrument (e.g. a YSI multi-probe) and through laboratory analysis from selected locations.
RR-WQH-21	RR-354	Concerns that the Havant Thicket Reservoir may not be assigned an appropriate sensitivity rating by the Environment Agency as it has no existing environmental designations, potentially resulting in lower discharge controls.	The Applicant recognises the future importance of Havant Thicket Reservoir as a reservoir that will provide an important supply of potable water that also supports open water and marginal wetland habitats. It has therefore classified the reservoir as a high sensitivity receptor (e.g. the highest sensitivity category used in the Environmental Impact Assessment) in Table 19-54 of ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1). For the purposes of compliance with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2019, the Applicant has also assumed that the reservoir will be at Good Ecological Potential (e.g. it will be at the default status objective for an artificial or heavily modified water body) at the time of the introduction of recycled water. This assumption has been adopted on a precautionary basis, noting that the Environment Agency will not determine the status of the water body until after it has been completed. The Applicant has undertaken extensive engagement with the Environment Agency, which has confirmed its agreement that the baseline characterisation and assessment methodology (including assigned receptor sensitivity) are appropriate, as demonstrated in rows EA-ES-062, EA-ES-067 in the Draft Statement of Common Ground – Environment Agency (Document reference 5.8, DCO Volume 5, Version 1).

Reference	RR references	Summary of issue raised	The Applicant's response
RR-WQH-22	RR-248, RR-288, RR-354	Suggestions that a full contaminant mass balance and independently reviewed assessment across all stages of the treatment and reservoir system be required prior to approval.	The design developed to this point is a concept design developed using available data, industry good practice and specialist expertise. The WRP concept design has been based on extensive sampling of the Budds Farm Wastewater Treatment Works (Budds Farm WTW) treated wastewater, including the Environmental Quality Standard (EQS) parameters. This dataset has formed, and continues to form, the basis of the mass balance used, benchmarked, reviewed and checked for the Project. The removal rates across the WRP have been reviewed by a panel of experts, including representatives from the Applicant and Portsmouth Water, forming the Water Quality Steering Group. The Water Quality Steering Group defined and approved the inputs and direction of the reservoir mass balance. The resulting model, which forms the basis of the reservoir assessment, has also been reviewed by the Water Quality Steering Group. Further information on the investigation of Contaminants of Emerging Concern (CECs) in recycled water from the pilot plant is provided in the Applicant's responses to RR-WQH-04, RR-WQH-05.
RR-WQH-23	RR-266, RR-354, RR-355	Concerns over the potential human-health implications of contaminants of concern and treatment by-products entering the drinking water supply via the Havant Thicket Reservoir.	As described in the response to RR-WQH-04, the Applicant has undertaken a detailed investigation on the likely performance of the WRP using a pilot plant. The results of the investigation are described in an independent review produced by the University of Brighton (Mayor-Smith (2024) [1], as referenced in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1). The results of the investigation into pilot plant performance indicate that the Full Advanced Treatment process resulted in a considerable increase in water quality, with the concentration of CECs decreasing after passing through the pilot plant. Over 60% of the CECs measured in the WRP influent decreased to below the limits of detection in the water that had passed through the WRP, with the largest reductions identified for a range of pharmaceuticals, personal care products and pesticides. As described in the response to RR-WQH-10, the overall water quality characteristics and health benefits of the source water that is transferred and stored at Havant Thicket Reservoir would not be significantly different to the current water quality profile of water treated at Otterbourne WSW prior to going into supply. Drinking water supplies are subject to regulation by the Drinking Water Inspectorate to ensure compliance with legal standards for drinking water quality and safety. The Applicant's treatment, testing and monitoring regime ensures compliance with these standards.

Table 2-41 Summary of issues raised on the theme of wider water industry challenges and the Applicant's response

Reference	RR references	Summary of issue raised	The Applicant's response
RR-WWIC-01	RR-150, RR-156, RR-300, RR-335, RR-354	Concerns about the poor operational track record and repeated failures of the Applicant and other UK water companies, including treatment plant, pumping station, automation and monitoring failures.	The Applicant recognises concerns about reputation, particularly in relation to water pollution, fines, asset maintenance and operational performance. The 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 Applicant also has a strong record on drinking water quality performance. In 2025, SW achieved 99.98% compliance with the standards in The Water Supply (Water Quality) Regulations 2016 for over 225,000 tests on treated water carried out at treatment works, service reservoirs and consumer properties. This is above the industry compliance record for the same year of 99.97%. The Project would also be subject to robust control systems and maintenance regimes. The advanced treatment process at the Water Recycling Plant would use multiple treatment barriers before blending and final treatment at Otterbourne Water Supply Works (WSW), as described in Environmental Statement (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. The Project would also require regulated discharge consents from the Environment Agency.
RR-WWIC-02	RR-173, RR-280, RR-300, RR-335, RR-353	Concerns about pollution of rivers, seas and coastal waters caused by sewage and effluent discharges from water companies.	The Applicant recognises concerns about sewage and effluent discharges from existing infrastructure and the effect this has had on confidence in the water industry. The Applicant's wider programme to improve operational performance, including reduced pollution incidents under its Turnaround Plan, is addressed in RR-WWIC-01. The Project would not authorise uncontrolled discharges or remove the Applicant's obligations in relation to existing wastewater assets. Potential effects of the Project on the water environment have been assessed in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1), and the discharge from the Eastney Long Sea Outfall (LSO) has been modelled in ES Appendix 19.5 Eastney LSO Solent dispersion modelling [APP-200]. The Project would use treated wastewater as a resource within a controlled water recycling process and would remain subject to environmental permitting and drinking water quality regulation before operation.
RR-WWIC-03	RR-280, RR-300	Concerns that the privatisation of the water industry and its for-profit ownership model has resulted in deteriorating water quality.	Questions about the ownership structure of the water industry are wider policy matters and are not determined through the Development Consent Order (DCO) examination for this Project. As a regulated industry, the amount of return that the Applicant can make on its investment is controlled by the water industry economic regulator, Ofwat. Ofwat exists to protect the consumer and

Reference	RR references	Summary of issue raised	The Applicant's response
			ensure water companies deliver value for money by controlling costs that water companies can charge customers. The Applicant also has a strong record on drinking water quality performance. See response to RR-WWIC-01.
RR-WWIC-04	RR-300	Concerns about the prioritisation of shareholder dividends, executive bonuses and profits over investment in infrastructure, customer service and environmental protection.	Matters regarding shareholder dividends, executive bonuses and wider financial decisions across the water industry are broader policy and regulatory matters and are not determined through the DCO examination for this Project. As a regulated industry, the amount of return that the Applicant can make on its investment is controlled by the water industry economic 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. The Applicant's wider programme related to environmental protection is addressed in RR-WWIC-01 and RR-WWIC-02
RR-WWIC-05	RR-084, RR-156, RR-300	Comments that failures to meet mandated standards for public protection should attract stronger enforcement, including bans, shutdowns or increased fines for non-compliant water companies.	Enforcement policy is a matter for the relevant regulators, including the Environment Agency, Ofwat and the Drinking Water Inspectorate, rather than the Applicant or the DCO examination. The Project would be subject to independent regulatory oversight and could only operate within the limits of the consents, permits and quality requirements that apply to it. Drinking water quality would be regulated through the statutory drinking water framework, while discharges and other environmental matters would be controlled through Environment Agency permitting.
RR-WWIC-06	RR-018, RR-300, RR-354	Concerns about gaps in the UK regulatory framework for water recycling, the inadequacy of self-regulation, and the need for robust independent scrutiny of the water industry.	The Project would not rely on self-regulation or self-monitoring alone. Drinking water quality would be regulated by the Drinking Water Inspectorate, including requirements for risk assessment, treatment, monitoring and compliance with The Water Supply (Water Quality) Regulations 2016. The treatment process, blending and final treatment are described in ES Chapter 3 Description of the Proposed Development [APP-082]. The output from the water recycling plant will be subject to an environmental permit, controlling the quality of the water discharged into the Havant Thicket Reservoir. As set out in the National Policy Statement for Water Resources Infrastructure, at paragraph 3.8.3, the Secretary of State "should assess the potential impacts of processes, emissions or discharges to inform decision making, but should work on the assumption that, in terms of the control and enforcement, the relevant pollution control or other consenting regime will be properly applied and enforced". For further information about the relationship between the DCO and the applicable regulatory regimes, please refer to Appendix D and 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).

Reference	RR references	Summary of issue raised	The Applicant's response
RR-WWIC-07	RR-300, RR-353	Concerns that existing wastewater treatment infrastructure lacks capacity to cope with current and future flows, including those arising from new housing developments.	Existing wastewater treatment infrastructure is required to operate in accordance with its applicable regulatory and permitting requirements, including in relation to current and future wastewater flows. The Project is not intended to provide wastewater treatment capacity and does not form part of the wastewater collection or treatment system. Instead, it would use a proportion of the treated wastewater from Budds Farm Wastewater Treatment Works that would otherwise be discharged to the marine environment in order to produce recycled water for public water supply. The Project and operational transfers are described in ES Chapter 3 Description of the Proposed Development [APP-082], while any potential effects to the receiving-water environment are assessed in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1). Any discharges or abstractions associated with the Project would also require the relevant environmental permits and regulatory approvals. The response to RR-WWIC-02 addresses concerns about sewage and effluent discharges from existing infrastructure.
RR-WWIC-08	RR-300	Comments that water companies should prioritise investment in stopping sewage discharges and improving treatment of wastewater before pursuing new schemes such as water recycling.	Pursuing water recycling to maintain customers' supplies does not remove the Applicant's wider obligations to improve wastewater performance or comply with environmental requirements. The Project would use treated wastewater as a resource while remaining subject to environmental permitting, and drinking water quality regulation. The Applicant is investing record amounts to improve its performance for customers and the environment and has ambitious investment plans for the future including reducing storm overflows, however, these are not related to the Project and are subject to separate statutory duties, regulatory programmes and investment planning. As outlined in RR-WWIC-01, the Applicant has implemented a Turnaround Plan (2023–2025) including, reducing pollution incidents. Since 2020, pollution incidents have reduced by 38%. The Project addresses the need to secure resilient public water supplies in response to forecast supply deficits, as explained in Case for the Project (Document reference 5.6, DCO Volume 5, Version 1).
RR-WWIC-09	RR-300	Comments that alternative approaches to wastewater treatment are available and should be pursued by the Applicant.	The purpose of the Project is not solely to change wastewater treatment practice, but to provide a new water resource by treating and reusing water that would otherwise be discharged into the environment. The response to RR-WWIC-08 addresses the related point that investment in wastewater treatment and pollution reduction remains important but does not remove the need for this Project.
RR-WWIC-10	RR-300	Statements of concern about the impact of water industry practices on the ability to drink, swim in or enjoy clean water.	The Project is intended to support resilient public water supplies while remaining subject to controls that protect human health and the water environment. Water supplied to customers would continue to be required to meet statutory drinking water standards, while potential effects on the water

Reference	RR references	Summary of issue raised	The Applicant's response
			environment have been assessed in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1). The response to RR-WWIC-01 addresses treatment safeguards and monitoring for the Project, and the response to RR-WWIC-02 addresses concerns about sewage and effluent discharges from existing infrastructure.
RR-WWIC-11	RR-300	A comment that phosphorus is a finite and critical resource, and that the water industry should recover phosphorus (and other nutrients) from sewage for return to land as fertiliser, rather than discharging it to waterways, to support food security and a circular economy.	Matters relating to phosphorus recovery, nutrient reuse and wider circular economy policy are outside the remit of the DCO examination for this Project. The Project has been developed to address an identified public water supply deficit by treating and reusing water as part of the future supply mix. It is not a phosphorus recovery scheme. However, the Applicant is involved in separate innovation work exploring chemical-free phosphorus removal and potential phosphorus recovery, including reactive media trials with the University of Portsmouth and other water sector partners. For this Project, assessment of the implications of the construction and operation of the Project on nutrient loads within the Solent and River Itchen catchments are outlined ES Appendix 19.7 Nutrient Assessment [APP-202], which identifies that phosphorus would be removed through membranes within the Water Recycling Plant.

References

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[3] K. T. N. L. P. B. a. A. T. F. H. Uhlhorn, "Chemical profiling of surface water and biota in protected marine harbours impacted by combined sewer overflows.," 2025. [Online]. Available: https://www.sciencedirect.com/?fr=RR-11&ref=pdf_download&rr=a5f07f5aba97511d. [Accessed 7 October 2026].


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