Hampshire Water Transfer and Water Recycling Project

Draft Statement of Common Ground ~~with~~ - East Hampshire District Council

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1 Introduction

1.1 Overview of the project

1.1.1 Southern Water Services Limited (hereafter referred to as the 'Applicant') is developing proposals for the Hampshire Water Transfer and Water Recycling Project (the Project). The Project is a water supply scheme that will ensure the Applicant can maintain essential water supplies to customers, especially in a drought, while protecting the rare and sensitive River Test and River Itchen chalk streams.

1.1.2 The Project would use advanced treatment techniques to turn highly treated wastewater, that is usually pumped far out to sea, into purified recycled water at a new water recycling plant in Havant. This purified recycled water would be pumped via a pipeline to the Havant Thicket Reservoir where it would mix with spring water. Water from the reservoir would then be pumped along another pipeline to the Applicant's Otterbourne Water Supply Works where it would be treated to strict drinking water standards before being sent into supply.

1.2 Purpose of this Statement of Common Ground

1.2.1 The purpose of this Statement of Common Ground (SoCG) is to set out the areas of agreement and disagreement between the Applicant, and East Hampshire District Council (EHDC) in relation to the Development Consent Order (DCO) application for the Project.

~~1.2.1~~1.2.2 This document has been updated at Deadline 1 to reflect further engagement, progress in resolving outstanding matters and any changes to the parties' positions following submission of the DCO application. References to other Application documents have been updated from the original submission. Please refer to the latest version of the Guide to the Application (Document reference 1.3, DCO Volume 1) for the list of current versions of documents.

~~1.2.2~~1.2.3 The role of EHDC and the other host local authorities in the DCO process is to provide input on matters relating to local planning policy, land use, and the potential impacts of the Proposed Development on their administrative areas. This document aims to support the examination process by setting out the areas of agreement and those requiring further discussion specifically in relation to matters within the local authorities' statutory remit.

~~1.2.3~~1.2.4 This SoCG has been prepared with due regard to guidance issued under Section 50 of the Planning Act 2008 (PA 2008) concerning pre-application processes, including the Department for Levelling Up, Housing and Communities (2024) Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects ('Pre-application Guidance 2024'). This SoCG should be read alongside EHDC's Relevant Representation [~~(~~RR-089]~~)~~, which sets out the Council's detailed position on matters relevant to the Examination. References in this SoCG are intended to complement, and where appropriate cross-reference, the issues raised in that Relevant Representation.

1.3 Parties to this statement

1.3.1 This SoCG has been prepared by (1) Southern Water Services Limited as the Applicant and (2) EHDC.

1.3.2 Collectively, Southern Water Services Limited and EHDC are referred to as 'the parties'.

1.4 Terminology

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

Table 1-1~~1-1~~: Status terminology

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

2 Record of post DCO submission engagement

2.1.1 The Applicant has engaged with EHDC throughout the development of the DCO application and continues to engage with EHDC following submission of the application.

2.1.2 A comprehensive record of pre-application engagement, including statutory consultation carried out under section 42 of the PA 2008, is provided in the Statement of Engagement (Statement of Commonality appended) [APP-072] and the Consultation Report [APP-029].

~~A comprehensive record of pre-application engagement, including statutory consultation carried out under section 42 of the PA 2008, is provided in the Statement of Engagement (Statement of Commonality appended) [APP-072] and the Consultation Report (Document reference 5.1, DCO Volume 5) [APP-029].~~

2.1.3 This version of the SoCG is submitted at Examination Deadline 1 (DL1). It represents an update to the draft SoCG submitted with the DCO application, which had a reporting cut-off date of 27 April 2026, and has been updated to reflect engagement with EHDC since that date, where appropriate. The SoCG ~~is currently unsigned but has been reviewed and agreed by the relevant officer(s) at EHDC~~remains subject to the Council's internal procedural review and formal sign-off. The Applicant confirms that it accurately reflects the matters discussed and the current position between the parties. Formal agreement and signing of the SoCG will be progressed as engagement continues during the Examination.

2.1.4 Where appropriate, bilateral engagement with EHDC has continued since submission of the application on unresolved matters from the pre-application phase, matters arising during Pre-examination/Examination, and areas where further clarification is required. Error! Reference source not found.~~**Table 2-1**~~ sets out this engagement. Engagement remains ongoing throughout the Examination, and this SoCG is a live document, which will be updated and resubmitted as appropriate to reflect ongoing discussions, progress in resolving matters, and any changes to the status of issues identified by the parties.

~~3.0.0 The Applicant has engaged with EHDC throughout the development of the DCO application.~~

~~4.0.0 A comprehensive record of pre-application engagement, including statutory consultation carried out under section 42 of the PA 2008, is provided in the Statement of Engagement (Statement of Commonality appended) (Document reference 5.9, DCO Volume 5) and the Consultation Report (Document reference 5.1, DCO Volume 5).~~

~~5.0.0 This SoCG has been prepared for submission with a reporting cut-off date of 20 April 2026. Engagement with EHDC has continued beyond this date and will remain ongoing throughout the Examination. Accordingly, while this submitted version reflects all engagement up to 20 April 2026, the SoCG will continue to evolve as a live document, with further updates provided as additional discussions take place and outstanding matters progress.~~

~~**This version of the SoCG is submitted in draft and unsigned form. The content of this version has nevertheless been reviewed by the relevant**~~

~~officer(s) at EHDC. The Applicant confirms that at the reporting cut-off date, this version accurately reflects the matters discussed and the current position between the parties. Formal agreement and signing of the SoCG will be progressed as engagement continues during the Examination.~~**Table 2-1: Record of post-submission engagement**

Name	Purpose	Date
SoCG Review Meeting #1	The Applicant had a meeting with EHDC to discuss the draft SoCG along with its Relevant Representation~~s~~. Both Parties agreed to update the SoCG to reflect updated positions on~~f~~ issues raised in the EHDC Relevant Representation~~s~~ [RR-089].	05/11/2026

~~5.1.1~~

~~5.1.2 Since the reporting cut-off date, where necessary, bilateral engagement with EHDC on unresolved matters from the pre-application phase, matters arising during Examination, and areas where further clarification is required has continued. Where engagement has occurred, any records relevant to these matters will be set out in future iterations of this section.~~

~~6~~3 Statement of Common Ground

~~6.1.1~~3.1.1 **Table 3-1~~Table 3-1~~** provides a summary of the key matters discussed between the Applicant and EHDC in relation to the DCO application for the Project. Each matter is categorised according to its status, as defined in section 1.4. **Table 3-1~~Table 3-1~~** aims to clearly present the areas of agreement, those still under discussion, and any unresolved issues.

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

Row ID	Topic	Summary of EHDC ~~Position~~issue	Latest Position in Resolving the Issue	Application Document Reference	Status
Principle of development					
EHDC-nsc-001	Principle of development	EHDC recognises the concerns regarding water stress and supply deficit. EHDC supports the Project overall, as it will significantly reduce the amount of water taken from Hampshire chalk streams and help address the substantial water supply shortfall. However, EHDC notes serious concerns about public trust in Southern Water to deliver the scheme safely and about the use of Havant Thicket Reservoir for storing recycled water. Water recycling offers a valuable solution to mitigate nitrate discharge impacts from housing development on European designated sites in the Solent. Previous backlogs in housing development were only recently eased through mitigation schemes such as setting aside high-nutrient agricultural land and creating nutrient-absorbing areas. While these schemes provide benefits like biodiversity net gain and carbon storage, suitable sites are limited, and the loss of farmland raises concerns about food security. EHDC therefore welcomes water recycling as an additional, sustainable, and resilient mitigation option. EHDC in principle supports water recycling as a more sustainable and resilient option for water supply.	The Applicant welcomes EHDC's recognition of the benefits of the Project though notes the concerns raised. The Applicant and Portsmouth Water have been working together to assess the possible impacts on water quality within Havant Thicket Reservoir based on various operational scenarios. This investigation considers not only the implications for downstream drinking water treatment and supply systems, but also for the reservoir as an ecosystem, and the Hermitage Stream and Langstone Harbour, to which the reservoir shall be discharging a compensation flow. A detailed assessment of the potential impacts of the Proposed Development on water quality in Havant Thicket Reservoir is presented in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling~~, Volume II~~ (Document reference 6.2, DCO Volume 6, Version 1), and potential impacts on water quality in water bodies that would receive compensatory flows from the reservoir is presented in ES Appendix 19.6 Havant Thicket Reservoir compensatory flows water quality modelling [APP-201]~~., Volume II (Document reference 6.2, DCO Volume 6).~~ These assessments demonstrate that the Proposed Development would not result in significant adverse effects on water quality in Havant Thicket Reservoir and downstream water bodies such as Riders Lane Stream, Hermitage Stream, Langstone Harbour and the Solent. Furthermore, the Proposed Development would not result in deterioration in the status of any of these water bodies under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017. Further discussion of the results of these assessments is provided in ES Chapter 19 Water environment~~, Volume I~~ (Document reference 6.1,	ES Chapter 19 Water environment~~, Volume I~~ (Document reference 6.1, DCO Volume 6, Version 1). ES Appendix 19.11 Havant Thicket Reservoir water quality modelling~~, Volume II~~ (Document reference 6.2, DCO Volume 6, Version 1). ES Appendix 19.6 Havant Thicket Reservoir compensatory flows water quality modelling [APP-201]~~., Volume II (Document reference 6.2, DCO Volume 6).~~ ES Appendix 19.2 Water Environment Regulations Compliance Assessment~~,~~ ~~Volume II~~ (Document reference 6.2, DCO Volume 6, Version 1). Consultation Report [APP-029]~~.(Document reference 5.1, DCO Volume 5).~~ Statement of Engagement (Statement of Commonality appended) -[APP-072]. ~~Statement of Engagement (Document reference 5.9, DCO Volume 5).~~ EHDC Relevant Representations [RR-089].	Matters subject to further discussion~~Matter agreed with other party~~

Row ID	Topic	Summary of EHDC ~~Position~~issue	Latest Position in Resolving the Issue	Application Document Reference	Status
			DCO Volume 6, Version 1) and ES Appendix 19.2 Water Environment Regulations Compliance Assessment~~, Volume II~~ (Document reference 6.2, DCO Volume 6, Version 1). The Applicant has undertaken an extensive pre application consultation and engagement programme in order to ensure that the public and other stakeholders can understand and can comment on the Project. As discussed with EHDC on 5 November 2026, the Applicant noted the concerns raised in paragraph 2.4 EHDC Relevant Representations [RR-089] regarding *"The Examination should therefore consider whether the potential pollution and water-quality effects have been adequately assessed and whether the Project is capable of operating acceptably within that regulatory framework, while avoiding duplication of controls that properly fall within the Environment Agency's remit. In accordance with the NPS, the Secretary of State should be satisfied, through close cooperation with the Environment Agency, that potential releases can be adequately regulated and that there is no good reason to believe that the necessary permits or licences would not subsequently be granted."* The Applicant acknowledges East Hampshire District Council's comment. Assessments undertaken for the Project indicate that there will not be adverse effects on the water environment as provided in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1). ~~As discussed with EHDC on 5 November 2026, the Applicant noted the concerns raised in EHDC Relevant Representations regarding *"The Examination should therefore consider whether the potential pollution and water-quality effects have been adequately assessed and whether the Project is capable of operating acceptably within that regulatory framework, while avoiding duplication of controls that properly fall within the Environment Agency's remit. In accordance with the NPS, the Secretary of State should be satisfied, through close cooperation with the Environment Agency, that potential releases can be adequately regulated and that there is no good reason to believe that the necessary permits or licences would not subsequently be granted."* The Applicant acknowledges East Hampshire District~~		

Row ID	Topic	Summary of EHDC ~~Position~~issue	Latest Position in Resolving the Issue	Application Document Reference	Status
			~~Council's comment. Assessments undertaken for the Project indicate that there will not be adverse effects on the water environment as provided in ES Chapter 19 Water environment [APP-098].~~ The Applicant will continue to work closely with the Environment Agency as the regulator. The Environment Agency has stated within the RAPID Gate 3 sign off that they have not identified any issue that would indicate that these permits cannot be granted. EHDC reiterated that *"The Council's interest is whether the potential effects on East Hampshire have been properly assessed, whether there is sufficient assurance that they can be effectively regulated, and whether any controls that properly fall within the DCO are adequately secured."* The output of the water recycling plant will be controlled by 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" [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.		
EHDC-RR-089-20	Use of Havant Thicket Reservoir for the storage of recycled water	Paragraph 4.9 of EHDC Relevant Representations [APP-089] sets out Following the approval of Portsmouth Water's pipeline between Bedhampton Springs and Havant Thicket Reservoir, the Applicant has confirmed that no works or development are now proposed in or around the reservoir. The Project instead seeks to use Havant Thicket Reservoir for the storage and mixing of recycled water. The main issue for the Council is therefore the potential operational effect of the Project on Havant Thicket Reservoir and downstream water bodies, rather than the impact of new physical development within the District.	The Council's position in paragraph 4.9 EHDC Relevant Representations [APP-089] is acknowledged. The DCO application submitted by the Applicant seeks to authorise the use of Havant Thicket Reservoir to allow the storage of recycled water in the reservoir. The Applicant has undertaken assessments to understand the impact of storing recycled water in Havant Thicket Reservoir and of compensation flows on relevant downstream watercourses. Overall, with the implementation of mitigation measures, t~~T~~he predicted changes in water quality parameters are not expected to result in any adverse water quality impacts or affect the ability to deliver ecological enhancements and benefits within Havant Thicket Reservoir or 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	ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1). ~~ES Chapter 19 Water environment [APP-098]~~ EHDC Relevant Representations [APP-089].	Matters subject to further discussion

Row ID	Topic	Summary of EHDC ~~Position~~issue	Latest Position in Resolving the Issue	Application Document Reference	Status
			from the WRP into Havant Thicket Reservoir. It also reports on the water quality modelling exercise undertaken to assess the sensitivity of reservoir water quality to the introduction of recycled water.		
EHDC-RR-089-22	The water recycling process	The Council considers that the Applicant should demonstrate that the treatment process will consistently achieve the water quality standards relied upon in the Environmental Statement and that appropriate adaptative monitoring, intervention and regulatory controls are secured.	The Applicant acknowledges paragraph 4.11 of EHDC Relevant Representations [APP-089]. The multi-stage water recycling process will feature numerous safeguards, including continuous monitoring, to ensure that deviations in expected water quality can be quickly identified and rectified through partial or full system shutdowns. These safeguards will be implemented by the Contractor once appointed to construct and operate the Water Recycling Plant and will be a key specification for the plant to ensure water quality requirements are met. 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" 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].	ES Appendix 19.9 Outline Water Monitoring Plan [APP-204]. EHDC Relevant Representations [APP-089].	Matters subject to further discussion
EHDC-RR-089-33	The water recycling process	A key consideration is whether the treatment facility will continue to deliver those standards throughout its operational life. The ecological conclusions depend on the effective operation, maintenance and renewal of the treatment processes, including phosphorus removal and controls relating to pollutants, pathogens and invasive non-native species.	The Applicant acknowledges paragraph 4.22 of EHDC Relevant Representations [APP-089]. The WRP components and treatment process capability will be continually monitored, maintained and replaced throughout its lifecycle to ensure regulatory Environmental Permit compliance and efficiency. The environmental permit would specify the strict requirements necessary to protect tests to prevent potential impacts to on the environment from pollutants including phosphorous and pathogens and also achieve water quality standards. The WRP includes numerous safeguards so that significant deviations in water quality are quickly identified and rectified through partial or full system shutdowns, and in the unlikely event that the required standards are not met, water will be automatically diverted to the Eastney Long Sea Outfall (LSO). ES Chapter 14 Major accidents and disasters [APP-093] identifies a range of measures,	Non-Native Species (INNS) Biosecurity Plan [APP-425] ES Chapter 14 Major accidents and disasters [APP-093]. Operational Environmental Management Plan [APP-422]. Draft Development Consent Order [APP-023].~~(Document reference 3.1, DCO Volume 3, Version 1)~~ EHDC Relevant Representations [APP-089].~~Draft Development Consent Order [APP-023]~~	Matters subject to further discussion

Row ID	Topic	Summary of EHDC ~~Position~~issue	Latest Position in Resolving the Issue	Application Document Reference	Status
			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 corresponding Requirement in Schedule 2 to the D~~d~~raft DCO [APP-023]. ~~(Document reference 3.1, DCO Volume 3, Version 1).~~ 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 Environment Agency provided feedback on the Applicant's draft Invasive Non-Native Species (INNS) Biosecurity Plan [APP-425] and was satisfied with the Applicant's proposed approach to INNS control.	ES Chapter 14 Major accidents and disasters [APP-093].	
EHDC-RR-089-41	The water recycling process	These benefits depend on the recycled water consistently meeting the standards relied upon in the assessment. The Project includes advanced treatment, remote monitoring and control, emergency power and a run-to-waste arrangement intended to prevent non-compliant water from being transferred to Havant Thicket Reservoir. The Examination should confirm that these safeguards are capable of operating effectively in practice. EHDC considers the identified benefits may not be realised if public confidence in the perceived quality of drinking water reduces.	The Applicant acknowledges paragraph 4.30 of EHDC Relevant Representations [APP-089]. The WRP components would be maintained and replaced throughout the Project life to ensure regulatory compliance and efficiency. This will be safeguarded by specific requirements to be included in the Contractor agreement to operate the facility on behalf of the Applicant. The water quality from the WRP will be continuously monitored so that deviations in water quality will be quickly identified, investigated and rectified. There will be a dual mains supply from independent sub-stations with back-up power generators to ensure continuity of power supply. This will reduce the risk of system failures. The Applicant will comply with the requirements of the Water Supply (Water Quality) Regulations 2016, Water Environment Regulations 2015 and The Environmental Permitting (England and Wales) Regulations 2016. The Applicant notes the comment regarding public confidence. The Applicant confirms that appropriate liaison with public health and regulators (Drinking Water Inspectorate; Environment Agency) will be undertaken during the operational life of the Project. This will build on engagement undertaken to date with relevant authorities, public health representatives and local communities, as described in the Statement of Engagement [APP-072]. Future engagement will also include timely and accessible communication with customers about matters relevant to them,	Statement of Engagement (Statement of Commonality appended) [APP-072]. EHDC Relevant Representations [APP-089].	Matters subject to further discussion

Row ID	Topic	Summary of EHDC ~~Position~~issue	Latest Position in Resolving the Issue	Application Document Reference	Status
			using appropriate channels and taking account of the needs of different customer groups.		
EHDC-RR-089-32	The water recycling process	Although other regulatory regimes are in place to protect water quality, the possible magnitude and the complexity of effects are such that the Council considers that further assurance is needed that recycled water will meet the necessary standards assumed in the ES.	The Applicant acknowledges paragraph 4.21 of EHDC Relevant Representations [APP-089]. The release of water from the ~~Water Recycling Plant (~~WRP~~)~~ will be permitted by the Environment Agency (EA). The EA have stated within the draft ~~s~~Statement of C~~c~~ommon ~~g~~Ground (Document reference 5.8, DCO Volume 5, Version 2~~1~~) that they have not identified any issue that would indicate that these permits cannot be granted. Drinking water quality is overseen by the DWI and the Project will be required to comply with The Water Supply (Water Quality) Regulations 2016.	ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1). ~~ES Chapter 19 Water environment [(APP-098]~~ Draft Statement of Common Ground with Environment Agency (Document reference 5.8, DCO Volume 5, Version 2~~1~~). EHDC Relevant Representations [APP-089].~~Draft Statement of Common Ground with Environment Agency [APP-067]~~	Matters subject to further discussion
DCO and planning					
EHDC-2026-0001~~EHDC-2024-SC-0008~~	Article 5(8) draft DCO ~~Legacy and enhancements~~	EHDC notes that Article 5(8) draft Development Consent Order (DCO) states that exercising the undertaker's functions is not treated as a breach of planning control or planning obligations and is to be disregarded for purposes of the relevant planning legislation. EHDC is concerned that this could remove the council's ability to enforce conditions and obligations attached to the existing Thicket Havant Reservoir planning consent. ~~EHDC would welcome the opportunity to discuss apprenticeships during construction and operation, and how they can help facilitate these, and ensuring that local people benefit from the opportunities brought by the potential development.~~	The Applicant confirms that Article 5(8) of the Draft DCO [APP-023] ~~(Document reference 3.1, DCO Volume 3, Version 1)~~ gives SW a statutory right to use Havant Thicket Reservoir to store recycled water, blend it with spring water, and later abstract it. The Applicant also confirms that Article 5(8) addresses only breaches resulting from exercising those functions, such as a planning condition limiting the reservoir to spring water storage. Article 5(1) and (2) of the Draft DCO [APP-023] ~~(Document reference 3.1, DCO Volume 3, Version 1)~~ defines the functions of the "undertaker", i.e. the SW *"…use and enjoyment of the Havant Thicket Reservoir infrastructure authorised by this article includes, without limitation— (a) the conveyance of water from— (i) the authorised development to the reservoir; and (ii) the reservoir to the authorised development; (b) the storage of water in the reservoir; and (c) the drawing down and taking of water from the reservoir, being water that is recycled water produced by the authorised development and water that is a combination of recycled water and other water."* SW's step-in power is limited to taking positive action needed to address a failure affecting the reservoir's ability to store water and does not provide general control over reservoir operations or physical works; no physical works are	Draft Development Consent Order [APP-023].~~(Document reference 3.1, DCO Volume 3, Version 1)~~ Outline Skills and Employment Plan (Document reference 7.9, Volume 7, Version 1). ~~Draft Development Consent Order [APP-023]~~~~Outline Skills and Employment Plan (Document reference 7.9, Volume 7).~~ Explanatory Memorandum to Draft Order [APP-024].	Matters subject to further discussion~~Matter agreed with other party~~

Row ID	Topic	Summary of EHDC ~~Position~~issue	Latest Position in Resolving the Issue	Application Document Reference	Status
			proposed at Havant Thicket, other than access for sampling. Paragraph 8.10 of the Explanatory Memorandum to Draft Order [APP-024] also states that breaches concerning the physical form of the reservoir are unaffected. ~~The Applicant has engaged with EHDC in the development of the Outline Skills and Employment Plan (Document reference 7.9, Volume 7) through Environmental Impact Assessment Working Groups.~~ ~~The Outline Skills and Employment Plan (Document reference 7.9, Volume 7) include a commitment for the Contractor to work with local partners to explore funding or co-funding of relevant apprenticeships in key construction-related disciplines.~~		
Design and construction					
EHDC-2025-0007	Design and construction	EHDC's comments reflect support for the structured and environmentally focused approach of the design principles, with ongoing engagement and some suggestions for further clarity and inclusion. The principles are comprehensive, covering general and site-specific requirements for environmental protection, landscape integration, heritage, water management, and operational safety. EHDC comments include suggestions to ensure all relevant parks (e.g. Staunton) are included in the principles; clearly set out the mitigation hierarchy for ecological impacts; and continue to refine and clarify commitments as the design evolves.	The Applicant engaged with EHDC on the General and Site-Specific Design Principles in April and September 2025. The Applicant confirmed that all commitments are now captured within the Mitigation Register (ES Appendix 5.5 Commitments Register (Document reference 6.2, DCO Volume 6, Version 1)), avoiding duplication with management plans in the design principles. The District Council noted that significant changes and deletions were made to the design principles following the bilateral meeting on 25 June 2025; as a result, previous comments and suggestions do not apply to the latest version.	ES Appendix 5.5 Commitments Register (Document reference 6.2, DCO Volume 6, Version 1)	Matter agreed with other party
EHDC-2025-SC-0001	Design and construction	Following review of the updated consultation information, EHDC confirms that comments on revised environmental water quality data will be provided by Havant Borough Council. Of the 25 proposed design refinements, only Refinement 4 – Havant Thicket Reservoir – falls within the District Council's boundary. This refinement introduces a connection point and route from Staunton Country Park to the reservoir, extending the draft Limits of Deviation but not altering the draft Order Limits, which already cover the full reservoir site. As no new or different effects are anticipated compared to those outlined in the Summer 2024 Preliminary Environmental Information Report, and as construction will occur within the existing reservoir site, the District Council has no concerns or comments on the proposed refinements.	The Applicant has acknowledged EHDC's position. Following approval of Portsmouth Water's pipeline between Bedhampton Springs and Havant Thicket Reservoir in May 2025, the Project is no longer proposing any works or development in or around Havant Thicket Reservoir. The Applicant engaged with EHDC at a bilateral meeting on 25 June 2025, and EHDC agreed with this approach.		Matter agreed with other party
Major Accidents and disasters					

Row ID	Topic	Summary of EHDC ~~Position~~issue	Latest Position in Resolving the Issue	Application Document Reference	Status
EHDC-RR-089-37	Major accidents and disasters	The principal matter of relevance to East Hampshire is the operational interaction with Havant Thicket Reservoir, including the potential consequences of system failure, water quality failure, emergency discharges or other incidents affecting the transfer and storage of recycled water. The ES identifies remote monitoring and control, continuous staffing of the Water Recycling Plant, emergency power provision and the preparation of emergency response and incident management procedures as mitigation. It concludes that the residual risks would be reduced to as low as reasonably practicable and would not result in significant adverse effects. Whilst the Council acknowledges that the risk of major accidents and disasters can never be entirely eliminated, it has significant concerns regarding the adequacy of the proposed controls and, importantly, their implementation and ongoing management by Southern Water and other responsible bodies.	The Applicant acknowledges updated paragraph 4.26 EHDC Relevant Representations [APP-089]. The Applicant notes the Council's summary of the interaction between the Proposed Development and Havant Thicket Reservoir, including the mitigation measures identified within ES Chapter 14 Major accidents and disasters [APP-093]. The Applicant agrees that 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 a corresponding Requirement in Schedule 2 to the ~~d~~Draft DCO ~~(Document reference 3.1, DCO Volume 3, Version 1)~~ [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.	ES Chapter 14 Major accidents and disasters [APP-093]. Operational Environmental Management Plan [APP-422]. Draft Development Consent Order [APP-023].~~(Document reference 3.1, DCO Volume 3, Version 1)~~ EHDC Relevant Representations [APP-089].	Matters subject to further discussion
EHDC-RR-089-38	Major accidents and disasters	The Council's main concerns regarding monitoring, intervention and the allocation of responsibilities are set out in the Water Environment section. In relation to major accidents and disasters, satisfactory emergency arrangements should be put in place and enforced if necessary.	The Applicant acknowledges updated paragraph 4.27 EHDC Relevant Representations [APP-089]. The Applicant notes the Council's summary that satisfactory emergency arrangements should be put in place and enforced if necessary. The Applicant considers that appropriate emergency arrangements are secured through the mitigation and management measures identified within ES Chapter 14 Major accidents and disasters [APP-093], including emergency response procedures, monitoring and control systems, incident management procedures and emergency planning measures. These measures are secured through the Operational Environmental Management Plan [APP-422], which is secured by a corresponding Requirement in Schedule 2 to the D~~d~~raft DCO [APP-023]. ~~(Document reference 3.1, DCO Volume 3, Version 1).~~ The Applicant therefore considers that an appropriate framework is in place to ensure that emergency arrangements can be implemented effectively if required.	ES Chapter 14 Major accidents and disasters [APP-093]. Operational Environmental Management Plan [APP-422]. Draft Development Consent Order [APP-023].~~(Document reference 3.1, DCO Volume 3, Version 1)~~ EHDC Relevant Representations [APP-089].	Matters subject to further discussion
Consents and licences					
EHDC-RR-089-34	Legislation, policy and permits	The Examination should consider what would happen if the standards relied upon in the assessment were not achieved. The DCO and supporting documents should secure those monitoring, response and remediation measures	The Applicant acknowledges updated paragraph 4.23 EHDC Relevant Representations [APP-089]. ~~The Applicant notes these comments.~~ The DCO application includes a comprehensive framework of monitoring, management and mitigation	Outline Construction Environmental Management Plan – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1),	Matters subject to further discussion

Row ID	Topic	Summary of EHDC ~~Position~~issue	Latest Position in Resolving the Issue	Application Document Reference	Status
		that properly fall within the planning regime, while complementing the applicable permitting arrangements (per NPS WRI 3.8.3).	measures secured through the D~~d~~raft DCO [APP-023] and associated control documents. These include the Outline Construction Environmental Management Plan – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1), 2 of 3 documents [APP-413] and 3 of 3 documents [APP-414], Outline Water Monitoring Plan [APP-204], Operational Environmental Management Plan [APP-422], proposed sustainable drainage systems strategy within the Flood Risk Assessment [APP-196] and other topic-specific management plans submitted with the application.	2 of 3 documents [APP-413] and 3 of 3 documents [APP-414].~~,~~ ~~Outline Construction Environmental Management Plan [APP-412, APP-413 and APP-414],~~ Outline Water Monitoring Plan [APP-204]. Operational Environmental Management Plan [APP-422]. Flood Risk Assessment [APP-196] EHDC Relevant Representations [APP-089].	
Biodiversity and nature conservation					
EHDC-2024-0001	Biodiversity Net Gain/Environmental Net Gain	EHDC welcomes the commitment in the Environmental Impact Assessment to achieving the mandatory 10% biodiversity net gain and the forthcoming Outline Landscape and Ecology Management Plan (LEMP), which will detail habitat protection, enhancement, and retention alongside the Habitats Regulations Assessment. EHDC supports continued work to manage operational effects on the water environment, the Solent, and Havant Thicket Reservoir, but emphasises the need to clearly distinguish impacts and mitigation measures between this Project and the reservoir scheme, while ensuring integration where necessary. EHDC currently has no Biodiversity Net Gain (BNG) sites and is exploring options outside the applicant's boundary, working with Hampshire Biodiversity Information Centre (HBIC) to assess potential Sites of Importance for Nature Conservation land. A recent BNG call for sites generated limited interest.	The Applicant recognises that the geographical overlap with EHDC is minimal, primarily involving the reservoir and pipeline connections. The Applicant appreciates the District Council's strong support for the concept of Environmental Mitigation and Enhancement Areas. The DCO submission includes an Outline Construction Environmental Management Plan (CEMP) – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1), 2 of 3 documents [APP-413] and 3 of 3 documents [APP-414].~~,~~ 30 Environmental Mitigation and Enhancement Areas (EMEAs), and a Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1), all cross-referenced with the Outline Landscape and Ecology Management Plan (LEMP) (Document reference 7.5, DCO Volume 7, Version 1). The Applicant has acknowledged EHDC efforts in working with the Hampshire Biodiversity Information Centre (HBIC) to assess potential Sites of Important Nature Conservation (SINC) for BNG opportunities. In December 2024, the Applicant engaged with Hampshire County Council (HCC) in a bilateral meeting to explore opportunities for working with partners to deliver BNG, as well as additional enhancements and green infrastructure in the Project.	Outline CEMP – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1), Outline CEMP – 2 of 3 documents [APP-413] and Outline CEMP – 3 of 3 documents [APP-414].~~)~~. Outline LEMP (Document reference 7.5, DCO Volume 7, Version 1). Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1).	Matter agreed with other party

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			Given that these sites are outside the Project boundary, the Applicant requested confirmation from the District Council if there were other potential sites that could be accommodated within the Project's Order Limits. EHDC confirmed on 3 March 2025 that it has no proposed BNG opportunity sites at the present time within their boundary. EHDC confirmed at a bilateral meeting with the Applicant on 25 June 2025 that there are no proposed BNG opportunity sites within the District Council's boundary.		
EHDC-RR-089-35	Terrestrial and freshwater biodiversity	Subject to robust and enforceable controls being secured, and the Environment Agency and Natural England being satisfied that the identified effects have been adequately assessed and mitigated, the Council has no objection in principle on terrestrial and freshwater biodiversity grounds.	The Applicant acknowledges updated paragraph 4.24 EHDC Relevant Representations [APP-089]. The Applicant acknowledges the Council's comments. The ~~Environment Agency~~EA (Draft SoCG with Environment Agency (Document reference 5.8, DCO Volume 5, Version 2~~1~~) Row ID EA-ES-069) confirms that is in~~its~~ agreement that the terrestrial and freshwater biodiversity assessment findings and mitigation proposals are appropriate, having reviewed ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) in full. Natural England (Draft SoCG with Natural England (Document reference 5.8, DCO Volume 5, Version 1) Row ID NE-ES-107) also confirms that is ~~inits~~in agreement that the terrestrial and freshwater biodiversity assessment findings and mitigation proposals are appropriate. The measures 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)~~ – 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1)~~ are secured through the R~~r~~equirement 6 in Schedule 2 to the ~~d~~Draft DCO [APP-023], ~~(Document reference 3.1, DCO Volume 3, Version 1),~~ which require the detailed CEMP to be prepared in accordance with the Outline CEMP, approved by the relevant planning authority prior to the relevant works commencing, and subsequently implemented during construction. The Applicant therefore considers that the DCO provides an appropriate and enforceable mechanism for securing these measures.	Draft Statement of Common Ground Environment Agency (Document reference 5.8, DCO Volume 5, Version 2~~1~~). ~~Draft Statement of Common Ground Environment Agency [APP-067]~~ ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1). Draft Statement of Common Ground Natural England (Document reference 5.8, DCO Volume 5, Version 1). ~~Draft Statement of Common Ground Natural England [APP-069]~~ Outline CEMP ~~– 1 of 3 documents~~ (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3, [APP-413] and [APP-414] for documents 2 and 3). ~~(Document reference 7.1, DCO Volume 7, Version 1)~~ EHDC Relevant Representations [APP-089].~~Outline CEMP – 1 of 3 documents [APP-412]~~	Matters subject to further discussion

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				Draft Development Consent Order [APP-023]	
EHDC-RR-089-29	Terrestrial and freshwater biodiversity	The assessment also considers compensatory flows from the reservoir to Riders Lane Stream and the Hermitage Stream, together with the risk of introducing or spreading invasive non-native species and pathogens between catchments. The Project includes an Invasive Non-Native Species Biosecurity Plan and treatment at Otterbourne Water Supply Works to reduce these risks. Continued coordination with Portsmouth Water is also identified as necessary to ensure that mitigation and monitoring measures for the two projects are complementary. The Environment Agency and Natural England have been consulted through the pre-application process, EIA scoping and ongoing technical meetings and working groups. Their Statements of Common Ground record agreement on the scope, baseline and methodology of the relevant biodiversity and water-environment assessments, together with agreement on several mitigation measures. Natural England is satisfied that downstream water bodies would not be adversely affected by potential chemistry changes but this is, notably, subject to detailed consideration of the water-quality modelling by the Environment Agency. Some assessment findings and technical documents also remain subject to review or further discussion. The Council therefore asks the Examining Authority to have particular regard to the submissions of both organisations during the Examination. The Council recognises that water quality is principally regulated through other regimes. However, the Examination should still consider the potential environmental effects of the Project, including any cumulative impacts over time.	The Applicant acknowledges updated paragraphs 4.18-4.20 EHDC Relevant Representations [APP-089]. The assessment of compensatory flows is provided in ES Appendix 19.6 Havant Thicket Reservoir compensatory flows water quality modelling [APP-201]. The Invasive Non-Native Species Biosecurity Plan (ES Appendix 7.10 [APP-425]) sets out an outline approach to the management of INNS for the Project and provides the measures required to reduce or remove the risk of introducing or spreading INNS during construction and operation phases. It is secured by Requirement 14 of Schedule 2 of the D~~d~~raft DCO [APP-023]. ~~(Document reference 3.1, DCO Volume 3, Version 1).~~ Treatment of source water at Otterbourne WSW is secured via the Operational Environmental Management Plan [APP-422]. The Applicant notes that EHDC has~~ve~~ introduced the latter part of this matter into the draft SoCG after ISH1 having not raised previously. The Applicant refers to its ~~s~~ written summaries of oral submissions at OFH1 and ISH1 and post hearing actions (Application document reference 8.9, DCO Volume 8).	ES Appendix 19.6 Havant Thicket Reservoir compensatory flows water quality modelling [APP-201]. ES Appendix 7.10 Invasive Non-Native Species Biosecurity Plan [APP-425]. Draft Development Consent Order [APP-023].~~(Document reference 3.1, DCO Volume 3, Version 1)~~ ~~Draft DCO [APP 023]~~ Operational Environmental Management Plan [APP-422]. EHDC Relevant Representations [APP-089]. OFH1 and ISH1 and post hearing actions (Application document reference 8.9, DCO Volume 8).	Matters subject to further discussion
Landscape and visual impact					
EHDC-2024-SC-0005	Landscape and visual impact - baseline	EHDC appreciates that consideration of the location of the proposed project has considered the proximity of the South Downs National Park (SDNP) and the potential impacts on its setting, hence the location of the proposal falls outside the South Downs National Park. However, it is important to note that landscape impacts are not only local but cover a wider area and subject to	ES Chapter 13 Landscape and visual [APP-092]~~, Volume I (Document reference 6.1, DCO Volume 6),~~ assesses potential impacts on the landscape at local, county, and national scales. This assessment has informed the iterative design process from the outset, helping to avoid adverse effects and embedded good design principles. The Applicant engaged with EHDC at a bilateral	ES Chapter 13 Landscape and visual~~, Volume I (Document reference 6.1, DCO Volume 6).~~ [APP-092].	Matter agreed with other party

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		further changes to the project, this may impact further on the landscape.	meeting on 25 June 2025, and EHDC agreed with this approach.		
Traffic and transport					
EHDC-2024-SC-0006	Traffic and transport - methodology	Although no proposed junctions, compounds and storage areas are proposed in EHDC, the Council would defer to Hampshire County Council and National Highways for detailed comments on highway implications of the Project, and any suggested amendments to the proposals.	The Applicant has acknowledged EHDC's position and confirms that has engaged with the highway's authorities on the traffic and transport impacts of the Project.		Matter agreed with other party
Flood risk and water environment					
EHDC-nsc-002	Water environment - impacts of recycled water	EHDC requests assurances that the process does not recycle pollutants such as toxic compounds, pharmaceutical residues and microplastics back into drinking water.	The Applicant can confirm that the ~~Water Recycling Plant (~~WRP~~)~~ will use advanced treatment techniques to convert treated wastewater into highly purified recycled water. Special membranes are used to remove salts and a range of other impurities. Drinking water is treated to strict regulatory standards, ready for supply to domestic and non-domestic customers. The Applicant notes that this issue was previously agreed and confirms that it will continue engagement with EHDC during the Examination.		Matters subject to further discussion~~Matter agreed with other party~~
EHDC-RR-089-27	Water quality at Havant Thicket Reservoir	Notwithstanding the absence of physical works, the use of the reservoir for the storage and mixing of recycled water is an important consideration. The principal potential effect identified in the ES is a change in reservoir water quality, particularly the risk that increased phosphorus concentrations could result in greater phytoplankton growth and move the reservoir towards a more eutrophic condition. This could affect the reservoir's ability to support aquatic plants, invertebrates and fish and could also have consequential effects on downstream watercourses receiving compensatory flows.	The Applicant acknowledges paragraph 4.16 EHDC Relevant Representations [APP-089]. The Applicant confirms that water quality impacts on Havant Thicket Reservoir have been considered in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1)~~[APP-087]~~ and ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1)~~[APP-098]~~. These assessments, supported by detailed water quality modelling (ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1)~~[APP-206]~~), demonstrate that the release of recycled water would not result in any significant adverse effects on the reservoir.	ES Chapter 8 Terrestrial and freshwater biodiversity ~~[APP-087]~~(Document reference 6.1, DCO Volume 6, Version 1). ES Chapter 19 Water environment ~~[APP-098]~~(Document reference 6.1, DCO Volume 6, Version 1). ES Appendix 19.11 Havant Thicket Reservoir water quality modelling ~~[APP-206]~~(Document reference 6.2, DCO Volume 6, Version 1). EHDC Relevant Representations [APP-089].	Matters subject to further discussion
EHDC-RR-089-28	Water quality at Havant Thicket Reservoir	The Applicant relies on the treatment process at the Water Recycling Plant, including phosphorus removal, to ensure that recycled water discharged to Havant Thicket Reservoir meets the required water quality standards. The ES concludes that the reservoir would remain within the water quality	The Applicant acknowledges the updated paragraph 4.17 EHDC Relevant Representations [APP-089]. The Applicant acknowledges EHDC's comment. The assessments presented in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6,	ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1).~~[APP-087]~~	Matters subject to further discussion

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		range assessed as acceptable and that there would be no significant adverse effect on its ecological potential or on downstream aquatic receptors. A key consideration is whether the treatment facility will continue to deliver those standards throughout its operational life. The ecological conclusions depend on the effective operation, maintenance and renewal of the treatment processes, including phosphorus removal and controls relating to pollutants, pathogens and invasive non-native species.	Version 1)~~[APP-087]~~ and ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1)~~[APP-098]~~, supported by detailed water quality modelling (ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1)~~[APP-206~~ and ES Appendix 19.6 Havant Thicket Reservoir compensatory flows water quality modelling [APP-201]), demonstrate that the release of recycled water in Havant Thicket reservoir would not result in any significant adverse effects on the ecology of the reservoir or downstream water bodies. The Applicant notes that HBC has~~ve~~ introduced this matter into the draft SoCG after ISH1 having not raised previously. The Applicant refers to its ~~s~~ written summaries of oral submissions at OFH1 and ISH1 and post hearing actions (Application document reference 8.9, DCO Volume 8).	ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1).~~[APP-098]~~ ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1).~~[APP-206]~~ ES Appendix 19.6 Havant Thicket Reservoir compensatory flows water quality modelling [APP-201]. EHDC Relevant Representations [APP-089]. OFH1 and ISH1 and post hearing actions (Application document reference 8.9, DCO Volume 8).	
EHDC-RR-089-30	Water environment	The Environment Agency and Natural England have been consulted through the pre-application process, EIA scoping and ongoing technical meetings and working groups. Their Statements of Common Ground record agreement on the scope, baseline and methodology of the relevant biodiversity and water-environment assessments, together with agreement on several mitigation measures. Natural England is satisfied that downstream water bodies would not be adversely affected by potential chemistry changes but this is, notably, subject to detailed consideration of the water-quality modelling by the Environment Agency. Some assessment findings and technical documents also remain subject to review or further discussion. The Council therefore asks the Examining Authority to have particular regard to the submissions of both organisations during the Examination.	The Applicant acknowledges the updated paragraph 4.19 EHDC Relevant Representations [APP-089]. The Applicant acknowledges EHDC's comments, and notes that further consultation with the Environment Agency and Natural England on water quality modelling has been undertaken. The Applicant confirms that updated water quality modelling, which reflects changes to the design of Havant Thicket Reservoir, has been undertaken. The Applicant has updated ES Chapter 19 Water environment [APP-098], ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1)~~[APP-197]~~, and ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1)~~[APP-206]~~ for submission at Examination Deadline 1.	ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1).~~[APP-098]~~ Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1).~~[APP-197]~~ ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1).~~[APP-206]~~ EHDC Relevant Representations [APP-089].	Matters subject to further discussion
EHDC-RR-089-42	Water quality at Havant Thicket Reservoir	The final arrangements should provide for regular liaison with public-health bodies, relevant authorities and local communities regarding the	The Applicant acknowledges the updated paragraph 4.31 EHDC Relevant Representations [APP-089].	Statement of Engagement [APP-072].	Matters subject to further discussion

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		maintenance of water quality, as well as communication following any incident or exceedance. The respective responsibilities of Southern Water and Portsmouth Water should also be clearly defined.	The Applicant confirms that appropriate liaison with public health and regulators (Drinking Water Inspectorate; Environment Agency) will be undertaken during the operational life of the Project. This will build on engagement undertaken to date with relevant authorities, public health representatives and local communities, as described in the Statement of Engagement [APP-072]. Future engagement will also include timely and accessible communication with customers about matters relevant to them, using appropriate channels and taking account of the needs of different customer groups. ES Chapter 14 Major accidents and disasters [APP-093] identifies a range of measures, for the pipeline including remote monitoring and control systems, emergency power provision, continuous staffing of the Water Recycling Plant and emergency response procedures and communication strategy. These measures are secured through the Operational Environmental Management Plan [APP-422], which is secured by Requirement 13 in Schedule 2 to the ~~dd~~Draft DCO [APP-023]. The Applicant will be responsible for the water quality of the recycled water supply to Havant Thicket Reservoir. Portsmouth Water will be responsible for the water quality of the Bedhampton Springs water source to Havant Thicket Reservoir, as well as the operator of the reservoir. The Applicant is working closely with Portsmouth Water to set the reservoir water quality envelope, the associated monitoring processes and have undertaken jointly, extensive water quality modelling.	ES Chapter 14 Major accidents and disasters [APP-093]. Operational Environmental Management Plan [APP-422]. Draft Development Consent Order [APP-023]. EHDC Relevant Representations [APP-089].	
EHDC-RR-089-44	The water recycling process	The Council notes that the Environmental Statement states that most contaminants of emerging concern have not been assessed quantitatively because agreed environmental quality standards are not currently available, and that the Applicant has instead assessed the likely risks using the available monitoring and pilot-treatment data (as set out in ES Chapter 19, paragraphs 19.6.8 and 19.8.104-19.8.108) (1.Environmental Statement, Chapter 19: Water Environment, paragraph 19.6.8: "Due to the current absence of agreed water quality standards for the majority of CECs, these substances have not been considered quantitatively." See also paragraphs 19.8.104-19.8.108 regarding the definition of CECs and the Applicant's monitoring and pilot treatment programme.). Given that the relevant scientific	The Applicant acknowledges the updated paragraph 4.33 EHDC Relevant Representations [APP-089]. 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 Wastewater Treatment Works (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. This considered a wide range of substances, including: • Pharmaceuticals and Personal Care Products (PPCPs): Organic contaminants	ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1).~~[APP-098]~~ EHDC Relevant Representations [APP-089].	Matters subject to further discussion

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		evidence, regulatory standards and understanding of contaminants of emerging concern may continue to develop, the Council considers that the monitoring regime should incorporate adaptive monitoring arrangements, periodic review mechanisms and publication of monitoring information. These measures should be capable of being regularly reviewed and updated over time to reflect emerging evidence, changes in legislation and evolving best practice.	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 WRP, the pilot plant included the multi-barrier treatment process that will be primarily responsible for the effective removal of contaminants from the source water. 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), 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 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.		

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			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. 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[1] 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). Furthermore, 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.		
EHDC-RR-089-45	Water quality at Havant Thicket Reservoir	The Applicant concludes that the operational effects on the water environment would not be significant once the proposed treatment, monitoring and mitigation are taken into account. These matters fall principally within the Environment Agency's remit, with Natural England advising on protected sites and ecological receptors. Their draft Statements of Common Ground record areas of agreement, although parts of the water-quality modelling, the Water Environment Regulations compliance assessment and the overall findings remain under review. The Council is also concerned with respect to the potential for CECs/PFAs to be introduced into the reservoir with the potential for impacts upon human health. At the Issue Specific Hearing on 12/11/2026 the applicant agreed to provide the background data in relation to the pilot plant monitoring at Budds Farm and Peel Common and the Council reserves its position on this matter until this additional information has been provided.	The Applicant acknowledges the updated paragraph 4.34 EHDC Relevant Representations [APP-089]. Extensive engagement with the Environment Agency and Natural England has ensured broad agreement on the scope of the modelling and assessments relating to the water environment. The outputs of the engagement process are reflected in the updated ~~draft Statements of Common Ground (SoCGs)~~ with the Environment Agency ~~[APP-067]~~ (Document reference 5.8, DCO Volume 5, Version 2) and Natural England ~~[APP-069]~~ (Document reference 5.8, DCO Volume 5, Version 1). Whilst a number of positions were recorded as provisional in SoCGs when the DCO application was submitted, agreement on these matters has now largely been confirmed through further engagement and full review of the DCO application documents. The Applicant has updated ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1) for submission at Examination Deadline 1.	ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1).~~[REF TO BE CONFIRMED]~~ Draft Statement of Common Ground - Environment Agency (Document reference 5.8, DCO Volume 5, Version 2). Draft Statement of Common Ground - Natural England (Document reference 5.8, DCO Volume 5, Version 1). EHDC Relevant Representations [APP-089].	Matters subject to further discussion

[1] I. Mayor-Smith, "Reflections on water recycling pilot plant performance," 2024. [Online]. Available: https://www.southernwater.co.uk/media/natd2hg5/pilot-summary-report-uob-final .pdf. [Accessed 21 September 2026]

Row ID	Topic	Summary of EHDC ~~Position~~issue	Latest Position in Resolving the Issue	Application Document Reference	Status
			The Applicant notes the additional matter raised by EHDC following ISH1. The Applicant refers to its written summaries of oral submissions at OFH1 and ISH1 and post hearing actions (Application document reference 8.9, DCO Volume 8).	OFH1 and ISH1 and post hearing actions (Application document reference 8.9, DCO Volume 8).	
Socio-economics, tourism, recreation, and health					
EHDC-2024-SC-0008	Employment opportunities	EHDC would welcome the opportunity to discuss apprenticeships during construction and operation, and how they can help facilitate these, and ensuring that local people benefit from the opportunities brought by the potential development.	The Applicant has engaged with EHDC in the development of the Outline Skills and Employment Plan (Document reference 7.9, Volume 7) through Environmental Impact Assessment Working Groups. The Outline Skills and Employment Plan (Document reference 7.9, Volume 7, Version 1) includes a commitment for the Contractor to work with local partners to explore funding or co-funding of relevant apprenticeships in key construction-related disciplines. This engagement will commence once the Contractor has been appointed post-consent.	Outline Skills and Employment Plan (Document reference 7.9, Volume 7, Version 1)	Matter agreed with other party
Cumulative and in-combination effects					
EHDC-2025-0006	Cumulative effects assessment	EHDC clarified that some of the sites listed in East Hampshire were potential allocations in the draft Regulation 18 Local Plan. EHDC is now progressing to the next stage of the Plan, and it remains uncertain whether all of the original allocations will be carried forward into the Regulation 19 version. This is being actively tested through our Integrated Impact Assessment at present. Therefore, EHDC confirmed that the longlist was appropriate as of May 2025 but some sites in future may be subject to change. The District Council agreed with the sites/schemes that have been taken forward from the longlist to the shortlist but noted that some of the sites may or may not come forward (not those with planning permission) under Reg 19 Local Plan. The sites are currently being tested through our Integrated Impact Assessment process. EHDC agreed that due to the number of developments that have been identified for the longlist, the Environmental Statement will include a figure showing only the location of those developments that have been shortlisted for the Cumulative Effects Assessment (CEA).	The Applicant has engaged with EHDC and sought agreement on the CEA longlist, shortlist, and methodology (Document reference 6.1, DCO Volume 6). The Applicant has shared an updated CEA longlist giving response to all EHDC comments. EHDC has agreed that the longlist was appropriate as of May 2025 and that sufficient engagement has taken place. The District Council has agreed with the sites / schemes that have been taken forward from the longlist to the shortlist. Due to the number of developments that have been identified for the longlist, ES Figure 20.1 Projects considered as part of the cumulative effects assessment - short list [APP-410] ~~, Volume III (Document reference 6.3, DCO Volume 6)~~ shows only the location of those developments that have been shortlisted for the CEA. This approach has been considered acceptable by EHDC. EHDC also noted that some of the sites listed in East Hampshire were potential allocations in the draft Regulation 18 Local Plan. EHDC is now progressing to the next stage of the Plan, and it remains uncertain whether all of the original allocations will be carried forward into the	ES Chapter 20 Cumulative and in-combination effects~~,~~ ~~Volume I (Document reference 6.1, DCO Volume 6).~~ [APP-099]. ES Figure 20.1 Projects considered as part of the cumulative effects assessment – short list~~,~~ ~~Volume III (Document reference 6.3, DCO Volume 6).~~ [APP-410].	Matter agreed with other party

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			Regulation 19 version. This is being actively tested through our Integrated Impact Assessment at present. Following submission of the DCO application a revised July 2026 cut-off date was used to update the longlist and shortlist. EHDC reviewed and the only amendment regarding East Hampshire relates to the references to EHDC PC002 being identified as an allocated site HN1. The Applicant confirms that amended was made and the updated ES Appendix 20.1 will be submitted by Examination Deadline 2.		
Multiple issues					
EHDC-2024-SC-0009	General Comment	EHDC welcomes measures continuing to work to understand and manage the operational effects on the water environment, the Solent and new Havant Thicket Reservoir. There will, however, be a need to clearly differentiate between impacts and mitigation/compensation/enhancement measures arising from this project and the related reservoir scheme. There will need to be a degree of integration between Southern Water elements and the Havant Thicket Reservoir scheme.	Following approval of Portsmouth Water's pipeline between Bedhampton Springs and Havant Thicket Reservoir, the Project is no longer proposing any works or development in or around Havant Thicket Reservoir. The Applicant is only seeking use of Havant Thicket Reservoir for the storage of recycled water and should be clear that any impacts and mitigation required for the construction or design of Havant Thicket Reservoir are captured by the Havant Thicket Reservoir Environmental Statement and planning application. ES Chapter 3 Description of the Proposed Development [APP-082]~~, Volume I (Document reference 6.1, DCO Volume 6)~~ sets out the principal components of the Project and the integration between the two schemes. ES Appendix 20.1 List of 'other developments' – longlist and shortlist [APP-208]~~, Volume II, of the ES (Document reference 6.2, Volume 6)~~ shortlisted the Havant Thicket Reservoir Project as relevant to the cumulative effects assessment (under ref. HBC PC001). The Applicant engaged with EHDC at a bilateral meeting on 25 June 2025, and EHDC agreed with this approach.	ES Chapter 3 Description of the Proposed Development~~,~~ ~~Volume I (Document reference 6.1, DCO Volume 6).~~ [APP-082]. ES Appendix 20.1 List of 'other developments' – longlist and shortlist~~,~~ ~~Volume II (Document reference 6.2, DCO Volume 6).~~[APP-208].	Matter agreed with other party
EHDC-RR-089-31	EIA approach and methodology	The Council recognises that water quality is principally regulated through other regimes. However, the Examination should still consider the potential environmental effects of the Project, including any cumulative impacts over time.	The Applicant acknowledges the updated paragraph 4.20 EHDC Relevant Representations [APP-089]. The Applicant acknowledges the Council's comment that potential environmental effects on water quality, including cumulative effects, should be considered as part of the Examination. Potential effects on water quality are assessed within ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1)~~[APP-098]~~, which considers the likely significant effects of the Project on surface water	ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1).~~[APP-098]~~ ~~ES Appendix 19.2 Water Environment Regulations compliance assessment [APP-197]~~ ES Appendix 19.2 Water Environment Regulations compliance assessment ~~[APP-197]~~ (Document	Matters subject to further discussion

Row ID	Topic	Summary of EHDC ~~Position~~issue	Latest Position in Resolving the Issue	Application Document Reference	Status
			and groundwater receptors. In addition, ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1)~~[APP-197]~~ assesses potential effects on the water environment, including water quality. Cumulative effects are assessed within ES Chapter 20 Cumulative and in-combination effects [APP-099], which considers the potential for cumulative effects arising from the Project in combination with other relevant developments. These assessments are supported by a range of technical studies and modelling reported within the ES appendices, including ES Appendix 19.6 Havant Thicket Reservoir Compensatory Flows water quality modelling [APP-201], ES Appendix 19.11 Havant Thicket Reservoir water quality modelling [APP-206], ES Appendix 19.5 Eastney Long Sea Outfall Solent dispersion modelling [APP-200] and ES Appendix 19.12 Water Recycling Plant site Sustainable Drainage System dispersion modelling [APP-207]. The Applicant therefore considers that the likely significant effects of the Project on water quality, including cumulative effects, have been appropriately assessed through the EIA and reported within ES Chapter 19 Water Environment [APP-098], ES Chapter 20 Cumulative and in-combination effects [APP-099] and the associated technical appendices. These assessments have demonstrated that there are no likely significant effects on water quality as a result of the Project.	reference 6.2, DCO Volume 6, Version 1). ES Appendix 19.6 Havant Thicket Reservoir Compensatory Flows water quality modelling [APP-201]. ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1).~~[APP-206]~~ ES Appendix 19.5 Eastney Long Sea Outfall Solent dispersion modelling [APP-200]. ES Appendix 19.12 Water Recycling Plant site Sustainable Drainage System dispersion modelling [APP-207]. ES Chapter 20 Cumulative and in-combination effects [APP-099]. EHDC Relevant Representations [APP-089].	
EHDC-RR-089-49	The process of developing the Project	The Examination should consider whether the Proposed Development would affect the implementation or operation of the separately consented Havant Thicket Reservoir Project, including compliance with its planning conditions, requirements, environmental mitigation and monitoring arrangements. The respective controls applying to the two projects should be clear, compatible and capable of operating together effectively.	The Applicant acknowledges the updated paragraph 4.38 EHDC Relevant Representations [APP-089]. The DCO application seeks consent for the use of Havant Thicket Reservoir for the storage of recycled water, therefore the only anticipated effect will be the discharge of water into the reservoir and the abstraction of water from it, both of which will be governed by the relevant regulatory regimes. .	EHDC Relevant Representations [APP-089]	Matters subject to further discussion

~~7~~4 Signatories

~~7.1.1~~4.1.1 This SoCG is agreed between Southern Water Services Limited (the Applicant) and EHDC on the date below.

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

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


WATER
for LIFE®
from
Southern
Water®