Hampshire Water Transfer and Water Recycling Project

Draft Statement of Common Ground - Havant Borough 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 Havant Borough Council (HBC) in relation to the Development Consent Order (DCO) application for the Project.

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.

1.2.3 The role of HBC 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.

1.2.4 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 HBC's Relevant Representation [RR-127], which sets out HBC'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) Havant Borough Council.

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

1.4 Terminology

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

Table 1-1: Status terminology

Term	Explanation
Matter agreed with other party	Indicates that both Southern Water and HBC 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 HBC 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 HBC throughout the development of the DCO application and continues to engage with HBC 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].

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 30 April 2026, and has been updated to reflect engagement with HBC since that date, where appropriate. The SoCG is currently unsigned but has been reviewed and agreed by the relevant officer(s) at HBC. 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 HBC 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. **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.

Table 2-1: Record of post-submission engagement

Name	Purpose	Date
SoCG Meeting #1	Review the outstanding issues in the SoCG in line with HBC's Relevant Representation [RR-127].	06/11/2026
SoCG Meeting #2	Review the outstanding issues in the SoCG.	20/11/2026

3 Statement of Common Ground

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

Table 3-1: Summary of matters

Row ID	Topic	Summary of HBC issue	Latest position in resolving the issue	Application document reference	Status
Principle of development					
HBC-2024-0030	Principle of development	HBC recognises the need to find new sources of water, in addition to demand management, to address shortfalls in supply, which will require the delivery of large-scale strategic options.	The Applicant acknowledges and welcomes HBC's position.	Case for the Project (Document reference 5.6, DCO Volume 5, Version 1).	Matter agreed with other party
HBC-2024-SC-0001	Principle of development	HBC raised concerns regarding the use of water recycling, as this technology is new in the United Kingdom. Concerns relate to the environmental impact of water recycling and whether this is the best way to tackle the water supply deficit. HBC is concerned about the use of recycled water as a new technology and requests justification and additional information, including: • Environmental impact; • Efficiency for tackling water supply deficit; and • Scale, material and energy use of the Water Recycling Plant (WRP) site. HBC would like to reiterate the need to fully consider other options to address the recognised need, as well as for ongoing community and local authority engagement in the development of the proposal. It is noted that the content of an Environmental Statement (ES), prescribed by regulations, will include a description of the reasonable alternatives studied by the developer and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.	The Applicant acknowledges HBC's position, and this remains a matter of in principle disagreement. The principle of water recycling is well established and widely used around the world. 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, including the Project, and a further two by 2075) (paragraphs 1.26 – 1.27) and through the Applicant's Water Resources Management Plan 2019 (WRMP19) Annual Reviews and emerging Water Resources Management Plan 2024 (WRMP24). The Case for the Project (Document reference 5.6, DCO Volume 5, Version 1) (submitted as part of the DCO application), outlines the need for the Project regarding the provision of crucial water supply resilience to the Applicant's Western area, protecting nationally and internationally recognised chalk stream habitats, species and landscapes from risk of impact, and supporting their long-term recovery, while enabling housing and economic delivery across a large geographic sub-region projected to experience significant growth. ES Chapter 4 Consideration of alternatives [APP-083] meets the requirements of the EIA Regulations in relation to alternatives and the Scheme Development Report [APP-073] - [APP-075] provides a detailed account of the evolution of the Project from the Applicant's WRMP19. The Applicant discussed this issue with HBC at bilateral meeting on 6 November 2026. HBC has, however, consistently raised concerns regarding water recycling as the chosen solution. In its Section 42 consultation response, the Council confirmed that it did not seek to revisit the recognised need for additional water resources but considered that alternative options should be	Case for the Project (Document reference 5.6, DCO Volume 5, Version 1). Scheme Development Report [APP-073] - [APP-075] ES Chapter 4 Consideration of alternatives [APP-083]. HBC's Relevant Representations [RR-127]. ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1).	Matter not able to be agreed

Row ID	Topic	Summary of HBC issue	Latest position in resolving the issue	Application document reference	Status
			fully explored and that continued engagement with the Council and local communities was necessary as the scheme developed (HBC's Relevant Representations [RR-127]). The Applicant reiterates that it has considered reasonable alternatives to water recycling through its WRMP development and options appraisal processes, and water recycling and enhanced use of Havant Thicket Reservoir remains the preferred solution. The Applicant has engaged extensively with the Council on the development of the Project since it was selected as the preferred solution and has carried out a total of five full and targeted public consultations with local communities during the pre-application period.HBC confirmed in its Relevant Representations [RR-127] that this remains an unresolved matter in the draft SoCG. In particular, the Council has sought further assurance regarding the robustness and reliability of the proposed water recycling technology, its effectiveness in addressing the identified water supply deficit and the environmental and resource implications associated with the Water Recycling Plant. HBC considers that the Examination should be satisfied that the technology is robust and sufficiently proven, that the likely impacts have been properly assessed and that all reasonable alternatives have been adequately considered. The Applicant confirms that water recycling is a well-established and internationally proven technology that has been successfully implemented in countries such as the United States, Australia, and Singapore for over 40 years. The development of the Project has included input from specialists who have worked on or collaborated with others on these well-established international schemes, ensuring that best practice has been embedded throughout the design and development of the Project. • As stated in section 19.8 of ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1), the Applicant considers it 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. Pharmaceuticals and Personal Care Products: Organic contaminants sourced		
		HBC notes that in the absence of the data behind these conclusions the Council is unable to agree			

Row ID	Topic	Summary of HBC issue	Latest position in resolving the issue	Application document reference	Status
		that this matter has been rigorously tested and reviewed. Following the Issue Specific Hearing (Water Environment) on 12/11/2026, the Applicant has agreed to provide this information to all parties by Examination Deadline 1.	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). Data from the Applicant's pilot plant trials has shown that the purified recycled water produced would provide a safe and sustainable source of supply that, following further treatment to drinking water standards, will continue to meet the strict water quality standards required by the Drinking Water Inspectorate (DWI). Operational effects on the water environment are assessed in detail in Environmental Statement (ES) Chapter 19 Water environment (Document		

Row ID	Topic	Summary of HBC issue	Latest position in resolving the issue	Application document reference	Status
		HBC notes that the results of the Applicant's pilot plant remain contended	reference 6.1, DCO Volume 6, Version 1), and ES Appendix 19.2 Water Environment Regulations Compliance Assessment [APP-197]. These assessments, supported by water quality modelling (ES Appendix 19.5 Eastney Long Sea Outfall LSO dispersion modelling [APP-200], ES Appendix 19.6 Havant Thicket Reservoir compensatory flows water quality modelling [APP-201], ES 19.8 CORMIX Modelling for Chemicals Screened in via the Surface Water Risk Assessment Process [APP-203], ES Appendix 19.10 Degradation modelling [APP-205], ES Appendix 19.11 Havant Thicket Reservoir Water Quality Modelling [APP-206] and ES Appendix 19.12 Water Recycling Plant Site Sustainable Drainage System Dispersion Modelling [APP-207], conclude that the Project would not result in any likely significant effects on water quality or deterioration in chemical or physico-chemical status under the Water Environment Regulations 2017. On the basis of these assessments, the Applicant believes that potential effects on water quality have been adequately assessed.		
HBC-2026-0008	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 monitoring, intervention and regulatory controls are secured. A key consideration is whether the treatment facility will continue to deliver those standards throughout its operational life, not doing so has the potential to cause significant ecological and health impacts. 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 the longer term. 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. This should include regular	The Applicant notes that HBC has introduced this matter into the draft SoCG after ISH1 having not raised previously. 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).	Matters subject to further discussion

Row ID	Topic	Summary of HBC issue	Latest position in resolving the issue	Application document reference	Status
		monitoring of water quality in Havant Thicket Reservoir by an independent audit body established solely for the purposes of confirming compliance with all maintenance obligations and ensuring that water quality is not degraded.			
DCO and planning					
HBC-2026-0009	Article 5(8) draft DCO	HBC 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. HBC is concerned that this could remove the council's ability to enforce conditions and obligations attached to the existing Thicket Havant Reservoir planning consent. The Applicant has agreed to provide additional clarity over the intention of Article 5 (8) which was intended to only enable the use of the Reservoir for the storage and distribution of recycled water and not to interfere with the ability of the Council(s) to enforce perfectly valid and reasonable planning conditions and obligations secured through the planning permissions for the reservoir.	The Applicant confirms that Article 5(8) of the Draft DCO [APP-023] 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] 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 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.	Draft Development Consent Order [APP-023]. Explanatory Memorandum to Draft Order [APP-024].	Matters subject to further discussion
HBC-2024-SC-0011	Legacy and enhancements	The defences at Broadmarsh protect the historic coastal landfill behind them, which, without intervention, will continue to deteriorate and potentially fail within the next 10 years. If this occurs, the landfill could spill onto the foreshore and/or be required to be removed to a licensed facility, resulting in severe consequences to the environmentally designated sites within Langstone Harbour. HBC suggested during early engagement that the issue of sea defence reinforcement needs to be addressed as part of the DCO process.	Following further engagement between the Applicant and HBC, an approach to contributing towards improvements to Broadmarsh Coastal Park has been agreed. The Broadmarsh Coastal Park Improvement Fund will provide funding of £500,000 to be administered by HBC to deliver positive interventions at Broadmarsh Coastal Park to the south of the WRP site (and other potential measures in the surrounding area).	Case for the Project (Document reference 5.6, DCO Volume 5, Version 1).	Matter agreed with other party

Row ID	Topic	Summary of HBC issue	Latest position in resolving the issue	Application document reference	Status
		The Broadmarsh coastal defences in Bedhampton are in poor condition and have reached the end of their life. Given the proximity of the site, and the use of the land to accommodate the pipelines between Budds Farm Wastewater Treatment Works (WTW) and the WRP site, HBC indicated that a substantial contribution to improving these coastal defences should be made through the DCO given the proximity of the Project. HBC's design work to date indicates a total construction cost of c.£15m. At the same time, there are opportunities to improve the access and leisure experience for residents and visitors. Naturally, the two aims would need to be carefully balanced. HBC stated that it would welcome the opportunity to discuss with the Applicant a package of enhancements that need to be secured through the design of the scheme as it progresses and/or through the DCO provisions/requirements and/or a S106 agreement. These should include the investment in the Broadmarsh Coastal Park as follows: HBC noted that this suggestion features in the design considerations for the WRP site, and HBC will be glad to engage in collaborative discussions about the opportunities here. It was suggested that this should include: a) to improve the area for biodiversity - There are certainly opportunities for some meaningful enhancements/ecological gain here. The grassland and scrub habitats within the three Council owned areas south of Harts Farm Way could be managed to enhance biodiversity, and the central area is a potential site for a seasonal refuge for wintering bird species. b) to improve the area for leisure access by residents. This should be carefully balanced with the current and potential ecological value of the site. c) to protect the land from coastal erosion and flood risk. A feasibility study, funded by HBC and Southern Regional Flood and Coastal Committee Local Levy, has identified a rock armour defence as the leading technical and most cost-effective solution.	The HBC development plan policy BD11 (which relates to the allocation of the WRP site) 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 fund would respond to these priorities. During the bilateral meeting on 16 April 2026, it was agreed that the financial contribution would be directed towards environmental and ecological enhancements, rather than sea defences. Precise details of the allocation of funding will be determined by HBC, but it is likely to include elements such as: • Surface improvements, including Public Rights of Way (PRoW) along waterways where appropriate; • Improved lighting; • New benches. Enhanced planting and landscaping. The Broadmarsh Coastal Park Improvement Fund would be secured via a planning obligation specifying measures that this contribution can be spent on, by when and ensuring that these are aligned to the relevant Local Nature Recovery Strategy (LNRS).		

Row ID	Topic	Summary of HBC issue	Latest position in resolving the issue	Application document reference	Status
HBC-2024-SC-0027	Legacy and enhancements	Ecological enhancements to Watercourses: The freshwater ecology study has highlighted the poor ecological condition of HBC's main watercourses such as the Hermitage and Riders Lane Streams. HBC would very much welcome further attention being paid to watercourse enhancements (co-ordinated with the planned enhancement works related to the reservoir site) within the Borough (where all watercourses are in less-than-good condition): this could include physical enhancements within channel, or enhancements to riparian habitats such as wet woodland or floodplain grassland. Additionally, HBC would like to see ecological enhancements to watercourses, particularly around the Hermitage and Riders Lane streams.	The overarching purpose of the Project is to deliver ecological watercourse enhancements by reducing river abstraction. This is set out in the Case for the Project (Document reference 5.6, DCO Volume 5, Version 1). With regard to the Hermitage and Riders Lane streams, ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) identifies a package of geomorphological and habitat enhancements across Hermitage Stream and its tributaries (Riders Lane Stream and Park Lane Stream) to be undertaken by Portsmouth Water in order to mitigate the effects of the Havant Thicket Reservoir development. These measures, agreed with the Environment Agency through the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (WER) Regulation 19 derogation process, include channel re-naturalisation, removal of hard bank and bed protection, increased sinuosity, installation of leaky woody barriers, selective tree management, pond creation, and de-culverting. The works are intended to improve geomorphology and habitat quality for fish, invertebrates and macrophytes, delivering an improved future baseline. While the measures address physical modification and hydrological pressures associated with the reservoir, they are not expected to resolve existing water quality issues linked to point source pollution. With regard to how this Project is contributing to ecological enhancements to these watercourses, Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) WRP_2 Hermitage Stream states that opportunities to improve estuarine and riparian habitats in the tidal Hermitage Stream will be explored during the detailed design of the WRP site Sustainable Drainage Systems (SuDS) outfall and delivered where practicable. Design Principle WRP_16 Environmental mitigation: Boundary planting reinforcement - north and east edge also includes measures to interplant the existing vegetation along the north of the site boundary and east along Hermitage Stream with resilient species, to reinforce the existing mature trees.	Case for the Project (Document reference 5.6, DCO Volume 5, Version 1). Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1).	Matter agreed with other party
HBC-2024-SC-0028	Legacy and enhancements	HBC welcomes the suggestion that a Skills and Employment Plan (SEP) is to be developed to support the DCO application, which will aim to maximise the delivery of construction jobs and	The potential impacts on employment are assessed in Chapter 17 Socio-economics, tourism and health (Document reference 6.1,	ES Chapter 17 Socio-economics, tourism and health (Document reference	Matter agreed with other party

Row ID	Topic	Summary of HBC issue	Latest position in resolving the issue	Application document reference	Status
		training opportunities in the local area. HBC has an established process for creating, delivering and monitoring SEP through S106 agreements, using the Construction Industry Training Board (CITB) framework for measuring outputs towards providing training and jobs for local people, and would welcome the opportunity to develop this in advance of the DCO submission. One of the areas HBC felt was particularly exciting was the prospect of developing a skills and employment plan for the scheme, one that provides genuine opportunities for young people in Havant. HBC would welcome the opportunity to develop the plan with the Applicant, together with local schools, colleges and other training providers. Based on HBC's assessment, a contribution of £473,000 (index linked) was considered appropriate and derived from the Social Value Themes, Outcomes and Measures (TOM) Framework based upon Key Performance Indicator (KPI) outputs from National Skills Academy for Construction (NSAfC). Developer contributions to a skills hub will have more impact on the area than a general SEP for the recycling centre/pipeline.	DCO Volume 6, Version 1) of the ES. The Applicant engaged with HBC on the Outline SEP (Document reference 7.9, DCO Volume 7, Version 1). The details of the commitments in the Outline SEP (Document reference 7.9, DCO Volume 7, Version 1) would be secured through the draft DCO [APP-023] through subsequent local authority approval of a detailed SEP. The Case for the Project (Document reference 5.6, DCO Volume 5, Version 1) includes a Benefit Package 4: Skills and Employment Fund that is established alongside the Outline SEP (Document reference 7.9, DCO Volume 7, Version 1) and provides for funding of £300,000 by the Applicant to support a new Construction Training Skills Academy initiative in Havant. This will be secured via a legal agreement specifying the measures that this contribution can be spent on. This matter, including the value of the financial contribution, is agreed between the parties through email on 16 April 2026.	6.1, DCO Volume 6, Version 1). Outline Skills and Employment Plan (Document reference 7.9, DCO Volume 7, Version 1). Case for the Project (Document reference 5.6, DCO Volume 5, Version 1). Draft Development Consent Order [APP-023].	
HBC-2024-SC-0029	Legacy and enhancements	Consent APP/21/00189 for employment use on the site proposed for the WRP site, provided for a shared use path along Harts Farm Way and a controlled crossing. HBC is keen that the loss of employment at the WRP site should not also result in the loss of these sustainable travel improvements and requests that these are included in the plans. Sustainable travel links to the north and west should also be considered. There is an opportunity to provide cycle and footway access in the area to the west and south of the WRP site. This would require a realignment of the ditch, i.e. the site boundary. The parameters should not shut down the opportunity for a realignment of the WRP site boundary to facilitate better access. Ideally this would be specifically referenced in the parameters, or at least not precluded by the wording of the parameters, such as "reinforcing of existing site boundaries".	Whilst the previously consented site access design for the employment site was considered, it did not align with the emerging masterplan for the WRP site. The proposed site access has therefore been proposed indicatively in the vicinity of the existing site access. An indicative access drawing has been prepared with visibility splays based on recorded road speeds. This demonstrates that sufficient visibility could be achieved at this location. The Applicant will not provide a footway or cycleway to the west of the existing site access as this is neither practicable nor necessary. Physical constraints, including drainage and established landscaping, would require disproportionate intervention and result in the loss of valuable developable area, undermining the efficient use of the site. Furthermore, given the very limited number of staff expected to access the site, the absence of a western pedestrian/cycle link does not prejudice sustainable travel objectives, which can be adequately supported through existing and proposed access arrangements.		Matters subject to further discussion
Engagement and consultation					

Row ID	Topic	Summary of HBC issue	Latest position in resolving the issue	Application document reference	Status
HBC-2024-0001	Engagement	Section 42 Duty to consult: The Applicant has directly consulted HBC during formal consultation periods on the proposal. The Applicant is also in ongoing informal discussions with HBC about the proposed application. This includes joint officer groups for all the relevant LPA, topic based meetings regarding the emerging EIA working groups, as well as bilateral meetings between the project team and direct email communications. Section 47 Duty to consult local authority: The Applicant consulted HBC on its Statement of Community Consultation (SoCC) in the Spring of 2024. To the best of the HBC's knowledge, the consultation on the scheme took place in accordance with the Statement. Section 48 Duty to publicise: The Applicant has provided evidence to the Council of notices placed in local newspapers, the Times and the London Gazette.	The Applicant considers that all requirements in regard to pre-application consultation have been met. HBC raises no objection about the adequacy of the engagement process and has set out its position through the Adequacy of Consultation form.		Matter agreed with other party
Design and construction					
HBC-2025-0009	Design and construction	HBC agrees with all draft design principles relevant to WRP site other than those identified in the following issues.	The Applicant acknowledges HBC's position.	Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1).	Matter agreed with other party
HBC-2025-0005	Design and construction	HBC proposes that the design principle GDP_5 Sustainable water strategy be amended to strengthen the commitment: "To help reduce water consumption, the detailed design for the WRP site and Above Ground Plant (AGP) should seek to maximise measures of sustainable water use."	The Applicant notes the comment and remains committed to ensuring that the appointed Contractor incorporates measures for sustainable water use into the detailed design. Although there is no disagreement with the general thrust of the request, a commitment to 'maximise' could be incompatible with other operational design requirements. For consistency with the drafting of other commitments in the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) and to maintain the level of flexibility required for the detailed design stage, the Applicant does not propose to change the wording as suggested by HBC. The Applicant has engaged with HBC regarding the Design Principles on 6 November 2026. The Applicant explained that Requirement 3 of the Draft DCO [APP-023] provides for detailed design approval by the relevant authority, including design of the WRP in accordance with the design principles and approval of its external appearance. Mitigation and other commitments are secured through the design principles, relevant management plans and the Outline	Design Principles Document (Document reference 5.11, DCO Volume 5, Volume 1, Version 1). Draft Development Consent Order [APP-023]. Outline Carbon Management Plan [APP-423].	Matters subject to further discussion

Row ID	Topic	Summary of HBC issue	Latest position in resolving the issue	Application document reference	Status
			Carbon Management Plan [APP-423], with each document serving a distinct purpose.		
HBC-2025-0012	Design and construction	HBC proposes that the design principle GDP_8 Permeable surfaces be renamed to GDP_8 Sustainable Drainage & Permeable Surfaces, with a minor change to strengthen commitment "The detailed design will seek to maximise the use of sustainable drainage systems. This will incorporate permeable surfaces in areas of permanent hard standing where reasonably practicable, having regard to the need to manage surface water runoff and flows and to reduce pollution risk, especially in operational areas where fuel or other substances potentially harmful to the water environment may be stored or handled."	The Applicant again notes the comment and for the reasons set out above in relation to HBC-2025-0005 does not propose to incorporate the suggested change. The Applicant also notes that the suggestion seeks to introduce and/or reintroduce commitments that are contained in other control documents (i.e. they would be duplicative), namely in the SuDS Strategy at the ES Appendix 19.1 Flood Risk Assessment (FRA) [APP-189] - [APP-196]. The Applicant has engaged with HBC regarding the Design Principles on 6 November 2026 and reiterated that this commitment is secured in the SuDS Strategy at the ES Appendix 19.1 FRA [APP-189] – [APP-196].	Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). ES Appendix 19.1 Flood Risk Assessment [APP-189] [APP-196].	Matters subject to further discussion
HBC-2025-0013	Design and construction	HBC proposes that the design principle GDP_16 Statutory and non-statutory designated ecological sites be renamed to GDP_16 Statutory and non-statutory designated ecological sites and Solent Wader and Brent Goose mitigation, with the following changes: • Mitigation design will be in agreement with the Solent Wader and Brent Goose Strategy (SWBGS) Steering Group and detailed in the Habitats Regulations Assessment (HRA); • Construction will be undertaken with consideration given to the seasonal restrictions to avoid sensitive periods for these birds in accordance with the Outline CEMP.	An off-site location has been identified for the mitigation of affected SWBGS sites. The mitigation is set out in HRA Stage 2 and Marine Conservation Assessment Stage 1, including HRA Stage 1 (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) and is secured by the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3, [APP-413] and [APP-414] for documents 2 and 3). TFB23 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) secures that construction works will be timed to avoid the non-breeding bird season. There is therefore no point of disagreement with HBC, though the Applicant does not consider the suggested addition to the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) is necessary, as it would duplicate other controls. The Applicant has engaged with HBC regarding the Design Principles on 6 November 2026. As set out in the HBC Relevant Representations [RR-127], HBC is satisfied with the proposed mitigation for impacts to Solent Waders and Brent Goose Strategy Site H08 and that potential impacts on European sites and supporting habitat	Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). HRA Stage 2 and Marine Conservation Assessment Stage 1, including HRA Stage 1 (Document reference 5.2, DCO Volume 5, Version 2). 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). ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1). HBC Relevant Representations [RR-127].	Matters subject to further discussion

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			as detailed in 5.2 Habitats Regulations Assessment - Stage 2 Appropriate Assessment and Marine Conservation Zone - Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2) can be appropriately addressed. Requirement 17 of the Draft DCO [APP-023] secures the provision and long-term management of Solent Waders and Brent Goose mitigation. Prior to commencement of Work No. 1, the Applicant must demonstrate that the necessary mitigation land has been secured and submit the proposed management measures and implementation timetable for approval by the relevant planning authority, following consultation with Natural England. The mitigation must substantially accord with the Habitats Regulations Assessment and be provided and maintained in accordance with the approved details.	Draft Development Consent Order [APP-023].	
HBC-2025-0014	Design and construction	HBC proposes that the design principle GDP_17 Badger mitigation be renamed to GDP_17 Protected species mitigation to cover all protected species as per the wording below: • The detailed design of badger mitigation will have regard to the prevailing good practice guidance relevant to the protected species concerned including the Badger Trust's Best Practice Guidance for Developers (2023), Natural England's Badgers: advice for making planning decisions (2022), NatureScot's Best Practice Guidance – Creation of Artificial Setts (2018) and Natural England's Guidance on 'current use' in the definition of a badger sett (2009); • The design for new habitats for badger mitigation at applicable Environmental Mitigation and Enhancement Areas (EMEA). Where relevant this will be compliant with the requirements of any licence, the Outline CEMP and Outline Landscape and Ecology Management Plan (LEMP), or the relevant approved CEMP and LEMP as the case may be.	The Applicant notes that the suggestions seek to introduce and/or reintroduce commitments that are contained in other control documents (i.e. they would be duplicative). TFB4 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) secures that the Contractor will comply with relevant protected species legislation. The Applicant has engaged with HBC regarding the Design Principles on 6 November 2026. The Applicant reiterates that the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3, [APP-413] and [APP-414] for documents 2 and 3) secures that the Contractor will comply with all applicable legislation in any event.	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). Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1).	Matters subject to further discussion
HBC-2025-0015	Design and construction	HBC requests the reinstatement of the former GDP_21 Minimising Carbon Emissions to the design principles - The employment of energy efficiency measures will be addressed by the Outline Carbon Management Plan.	The Applicant notes that the commitments to reduce greenhouse gas emissions to as low as reasonably practicable are contained within the Outline Carbon Management Plan [APP-423] which will be controlled by DCO Requirement – requiring a detailed Carbon Management Plan (or	Outline Carbon Management Plan [APP-423]. Draft Development Consent Order [APP-023].	Matters subject to further discussion

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			plans) to be produced and approved post-DCO consent. Again, there is therefore no disagreement with the principle of the commitment but the inclusion of this as a design principle would duplicate an existing commitment. The Applicant has engaged with HBC regarding the Design Principles on 6 November 2026. The Applicant confirms that Requirement 12 of the Draft DCO [APP-023] secures the delivery of the measures described in the Outline Carbon Management Plan [APP-423]. It requires, before any part of the authorised development may commence, the relevant planning authority's approval of a carbon management plan for that part of the authorised development. A carbon management plan must be in substantial accordance with the outline document. The detailed carbon management plan must be implemented as approved.		
HBC-2025-0016	Design and construction	HBC requests the reinstatement of the former GDP_22 Development and Trees to the design principles - Where possible the siting and installation of the pipeline shall seek to retain and protect existing trees.	The Applicant notes that this is already covered by GDP_11 Retention of existing landscape features, wildlife corridors and vegetation of the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). The Applicant has engaged with HBC regarding the Design Principles on 6 November 2026. The Applicant reiterates that GDP_11 Retention of existing landscape features, wildlife corridors and vegetation of the Design Principles Document [APP-076] is secured through Requirement 3 Draft DCO [APP-023]. The requirement secures delivery of the site-wide and site-specific measures contained in the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1), requiring the authorised development to be constructed substantially in accordance with those principles.	Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). Draft Development Consent Order [APP-023].	Matters subject to further discussion
HBC-2025-0017	Design and construction	HBC requests the reinstatement of the former WRP_7 PRoW enhancements to the design principles - Opportunities will be explored to upgrade the PRoW along the Hermitage Stream potentially including improved multi-user access points from the road, enhanced lighting, seating, cycling provision, wayfinding and interpretive signage, to enhance its amenity value as a key connection to the coast for the local communities of Havant.	The Applicant notes that this PRoW is outside the Applicant's ownership. However, this has been included in the Case for the Project (Document reference 5.6, DCO Volume 5, Version 1) as part of the Benefit Package 5: Broadmarsh Coastal Park Improvement Fund. This financial contribution of £500,000 would be made available to HBC to implement enhancements within, but not limited to, Broadmarsh Coastal Park and	Case for the Project (Document reference 5.6, DCO Volume 5, Version 1). Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1).	Matters subject to further discussion

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			could be used to deliver Public Right of Way improvements along the Hermitage Stream. The Applicant has engaged with HBC regarding the Design Principles on 6 November 2026. The Applicant reiterates that section 4.7 Broadmarsh Coastal Park Improvement Fund of the Case for the Project (Document reference 5.6, DCO Volume 5, Version 1), in particular, paragraph 4.7.4 includes Public Rights of Way (PRoW) along waterways as site opportunities to be funded by the Applicant.		
HBC-2025-0018	Design and construction	HBC requests the reinstatement of the former BFWTW_6 Flood Risk, drainage and management to the design principles (reintroducing BFWTW 7, 8, 9): • Application of the FRA and Drainage Strategy will seek to ensure that: - Above ground infrastructure will not be located within 8m of the bank of a non-tidal watercourse or flood defence, or within 16m of the bank of a tidal watercourse, tidal flood defence or coastal defence; - The drainage strategy will ensure that surface water drainage is discharged at an agreed controlled rate. The drainage strategy will ensure suitable water quality by routing surface water through a suitable SuDS treatment system, prior to discharge.	The suggestions seek to introduce and/or reintroduce commitments that are contained in other control documents (i.e. they would be duplicative). The Applicant confirms that the ES Appendix 19.1 FRA [APP-189] - [APP-196] includes a SuDS Strategy produced for the indicative design of the AGP and WRP site. The Applicant has engaged with HBC regarding the Design Principles on 6 November 2026 and reiterated that this commitment is secured in the SuDS Strategy at the ES Appendix 19.1 FRA [APP-189] – [APP-196].	ES Appendix 19.1 Flood Risk Assessment [APP-189] - [APP-196]. Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1).	Matters subject to further discussion
HBC-2025-0011	Design and construction	HBC does not agree with the omission of a number of commitments from the draft Design Principles Document. HBC reiterated that it is expected to be the main reference document, setting the overarching principles and guiding the Project's design. HBC considers that all key matters should continue to be represented in this document. HBC proposed that other high-level principles separate from the draft design principles should be referenced, indicating where they are addressed in detail, e.g. 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). This approach would help ensure clarity and transparency about where detailed requirements	The Applicant notes HBC's position. The matter has been the subject of discussion and is a point of disagreement. The Applicant has set out the approach to securing commitments through the DCO which is to avoid duplication i.e. a commitment is made once in the appropriate management plan/secured document to avoid duplication. This is reflected in the ES Appendix 5.5 Commitments Register (Document reference 6.2, DCO Volume 6, Version 1) which contains an explanation of the relationship between the different control documents. This particular point concerns the mechanisms for securing commitments (i.e. HBC considers they should all be in the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1)) rather than the commitments themselves.	Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). ES Appendix 5.5 Commitments Register (Document reference 6.2, DCO Volume 6, Version 1). Outline Construction Environmental Management Plan (CEMP) (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3, [APP-413] and [APP-	Matter not able to be agreed

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		are set out, while keeping the main document focused on the guiding principles.		414] for documents 2 and 3).	
Archaeology, cultural heritage and heritage settings					
HBC-2024-SC-0013	Archaeology and cultural heritage - mitigation	HBC indicated that the production of a detailed heritage impact assessment for the new plant, would assist to establish any potential impact on the setting of the Old Bedhampton Conservation Area and/or the other above ground heritage assets and how any harm arising can be mitigated against. HBC acknowledges that the Applicant has addressed the potential effects on the Old Bedhampton Conservation Area and associated listed buildings in Chapter 7 Archaeology and cultural heritage of the ES [APP-086]. These effects, as assessed in the ES, were discussed during a bilateral meeting with HBC on 10 December 2025. Chapter 7 Archaeology and cultural heritage [APP-086] of the ES has been updated to reflect an absolute worst-case scenario, assuming the inclusion of a pipe bridge . This element is outside the Applicant's control, as it is being designed by Portsmouth Water. For assessment purposes, it is treated as a direct effect on the Conservation Area, given the scale of construction works and the proposed location of the pipe bridge. This is considered alongside changes to the setting resulting from works west of Mill Lane and at Bedhampton Springs. At present, the assessment identifies a temporary significant adverse effect during the construction phase, and a non significant impact during the operational phase. Detailed consideration regarding the impact of archaeological remains along the route through HBC has been considered by the Hampshire County Archaeological Service (up to April 2026).	The parties agree that the assessments and measures put in place make it possible to address this issue.	ES Chapter 7 Archaeology and cultural heritage [APP-086].	Matter agreed with other party
HBC-2026-0006	Archaeology and cultural heritage - mitigation	The Hampshire County Archaeological Service agrees with the Outline Written Scheme of Investigation (WSI) (Document reference 7.6, DCO Volume 7, Version 1) principles. The County Archaeological Service understands and is satisfied that the topographic survey will be carried out in advance of any earthworks and is identified in the Outline WSI (Document reference 7.6, DCO Volume 7, Version 1) for inclusion in the relevant survey-specific WSI (SSWSI(s)) for investigative fieldwork that forms part of the pre-commencement	The Applicant acknowledges the Hampshire County Archaeological Service's position. HBC confirmed in its Relevant Representations [RR-127] paragraph 4.15 that subject to the Proposed Development being implemented in accordance with the proposals and mitigation outlined in the ES Chapter 7 Archaeology and cultural heritage [APP-086], the Council raises no objection.	Outline Written Scheme of Investigation (Document reference 7.6, DCO Volume 7, Version 1). HBC Relevant Representations [RR-127].	Matter agreed with other party

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		activities. The Hampshire County Archaeological Service also supports the identification of areas for watching briefs or other archaeological intervention, being agreed with the Hampshire County Council (HCC) and Winchester City Council Archaeology Services, following completion of investigative fieldwork in any given area. The Hampshire County Archaeological Service understands and agrees with the sampling strategy in Appendix A of the Outline WSI (Document reference 7.6, DCO Volume 7, Version 1).		ES Chapter 7 Archaeology and cultural heritage [APP-086]	
HBC-2026-0007	Archaeology and cultural heritage - mitigation	The Hampshire County Archaeological Service requested to discuss the archaeological mitigation strategy.	The Applicant has engaged with the Hampshire County Archaeological Service to discuss the approach to archaeological mitigation at a bilateral meeting on 21 October 2025. The Applicant acknowledges the importance of signposting archaeological provisions across multiple documents, including the Indicative Environmental Masterplan appended to the Design Approach Document [APP-077] - [APP-079], the Outline LEMP (Document reference 7.5, DCO Volume 7, Version 1) and Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). This approach ensures that all relevant measures are clearly referenced and accessible for examination. The Outline WSI (Document reference 7.6, DCO Volume 7, Version 1) is secured through a DCO requirement. The Outline WSI (Document reference 7.6, DCO Volume 7, Version 1) is to all intents and purposes a mitigation strategy signposting to the non-investigative mitigation measures requested by consultees but which are specified and secured through other means. This signposting is at Outline WSI (Document reference 7.6, DCO Volume 7, Version1) table 1-1. A version of the Outline WSI, incorporating stakeholders' comments, is submitted with the DCO application. HBC confirmed in its Relevant Representations [RR-127] paragraph 4.15 that subject to the Proposed Development being implemented in accordance with the proposals and mitigation outlined in the ES Chapter 7 Archaeology and cultural heritage [APP-086], the Council raises no objection.	Outline Landscape and Ecology Management Plan (Document reference 7.5, DCO Volume 7, Version 1). Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). Design Approach Document [APP-077] - [APP-079]. Outline Written Scheme of Investigation (Document reference 7.6, DCO Volume 7, Version 1). HBC Relevant Representations [RR-127]. ES Chapter 7 Archaeology and cultural heritage [APP-086]	Matter agreed with other party
HBC-2026-0001	Archaeology and cultural heritage - baseline	The Hampshire County Archaeological Service has engaged throughout scheme development and confirmed that, at scoping stage, the precise ground impacts of the proposed tunnelling shafts and emerging Intermediate Pumping Stations (IPS)	The Applicant acknowledges the Hampshire County Archaeological Service's position. The Applicant has since shared locations of shafts, pipeline routes, AGP and construction compounds, and the Hampshire County	ES Chapter 7 Archaeology and cultural heritage [APP-086].	Matter agreed with other party

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		zones could not be fully assessed due to limited design detail. Further comment was therefore reserved pending detailed design.	Archaeological Service comments have informed scheme development through an iterative process. The scope of assessment, including change to setting, has been agreed and is reported in the ES Chapter 7 Archaeology and cultural heritage [APP-086]. Archaeological and geoarchaeological surveys, trial trenching and Ground Investigation (GI) monitoring have been undertaken in agreement with the Hampshire County Archaeological Service, informing the baseline and assessment. An Outline WSI (Document reference 7.6, DCO Volume 7, Version1) accompanies the DCO application, with further post-consent survey, evaluation and mitigation to be secured through bespoke SSWSI approved by the relevant archaeological advisors.	Outline Written Scheme of Investigation (Document reference 7.6, DCO Volume 7, Version1).	
HBC-2026-0002	Archaeology and cultural heritage - baseline	The Hampshire County Archaeological Service agrees with the proposed approach to baseline data collection and recommends inclusion of Hampshire Gardens Trust as a consultee, which has been confirmed by the Applicant. Relevant Hampshire archaeology strategies, datasets and guidance have been incorporated into the ES Chapter 7 Archaeology and cultural heritage [APP-086] and Outline WSI (Document reference 7.6, DCO Volume 7, Version1). The scope of further geophysical and intrusive survey has been discussed and progressed, and trial trenching and geophysical survey results have been shared for information. It is agreed that not all areas of archaeological potential can be trial trenched; accordingly, the Outline WSI (Document reference 7.6, DCO Volume 7, Version1) provides for archaeological monitoring during construction, including procedures for managing delays should significant remains be encountered, with advance trial trenching to be undertaken where necessary to avoid unacceptable disruption to works.	The Applicant acknowledges the Hampshire County Archaeological Service's position.	ES Chapter 7 Archaeology and cultural heritage [APP-086]. Outline Written Scheme of Investigation (Document reference 7.6, DCO Volume 7, Version 1).	Matter agreed with other party
HBC-2026-0003	Archaeology and cultural heritage - baseline	The Hampshire County Archaeological Service endorses the approach to the priority boreholes. The Hampshire County Archaeological Service supports the programme of GI works.	The Applicant acknowledges the Hampshire County Archaeological Service's position.		Matter agreed with other party
HBC-2026-0004	Archaeology and cultural heritage - baseline	The Hampshire County Archaeological Service supports the approach to data searches of the relevant Historic Environment Records (HER) for Portsmouth, Winchester, and Hampshire that forms part of the ES Chapter 7 Archaeology and cultural heritage, baseline [APP-086].	The Applicant acknowledges the Hampshire County Archaeological Service's position.	ES Chapter 7 Archaeology and cultural heritage [APP-086].	Matter agreed with other party

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HBC-2026-0005	Archaeology and cultural heritage - assessment	The Hampshire County Archaeological Service endorsed the Phase 1 geophysics (ES Appendix 7.3 Detailed gradiometer survey report - Phase 1, [APP-119]) reporting and Phase 2 Geophysical Survey Written Scheme of Investigation (WSI) (ES Appendix 7.8 Detailed gradiometer survey report - Phase 2 [APP-124]). The Hampshire County Archaeological Service confirms that it has no comments on ES Appendix 7.8 Phase 2 Detailed gradiometer survey report - Phase 2 [APP-124] or ES Appendix 7.9 Trial trenching report [APP-125]. Both documents are welcomed and are considered valuable in informing any future archaeological mitigation.	The Applicant acknowledges the Hampshire County Archaeological Service's position.	ES Appendix 7.3 Detailed gradiometer survey report - Phase 1 [APP-119]. ES Appendix 7.8 Detailed gradiometer survey report - Phase 2 [APP-124]. ES Appendix 7.9 Trial trenching report [APP-125].	Matter agreed with other party
Habitats and ecology					
HBC-2024-0026	Design and construction	HBC requested a sensitive lighting scheme to minimise impacts on protected species.	The parties agree that the assessments and measures put in place make it possible to address this issue. The provision of a sensitive lighting scheme is covered by GDP_6 in the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1).	Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1).	Matter agreed with other party
HBC-2024-0025	Habitats regulations assessment/Marine Conservation Zone	HBC is content that the effects of operational noise levels on qualifying features of Chichester and Langstone Harbours SPA/Ramsar will be fully assessed in the ES by the Applicant. During operation, noise is not predicted to be sufficiently above existing levels at either the WRP site or Budds Farm WTW to result in a significant effect. HBC is content that the pipeline between Bedhampton Springs and Havant Thicket Reservoir is no longer within the scope of the DCO application, meaning that the SINC referred to will not be impacted by the Project. HBC is content that the loss of the Solent Waders and Brent Geese Strategy (SWBGS) site on the WRP site is being fully assessed in the Habitats Regulations Assessment by the Applicant. HBC considers that the range of potential impacts (during construction, operation and decommissioning phase) is being considered appropriately.	The parties agree that the assessments and measures put in place make it possible to address this issue. The Applicant will work with Natural England and HBC to identify a suitable mitigation site and implement measures to ensure that no residual impacts remain. HBC is content, in principle, with the proposed approach pending review of the HRA Stage 2 and Marine Conservation Assessment Stage 1, including HRA Stage 1 (Document reference 5.12, DCO Volume 5, Version 2). The Applicant has engaged with HBC on 6 November 2026. As set out in HBC Relevant Representations [RR-127] paragraph 4.16, HBC confirms that the overall scope of survey and assessment is considered appropriate and the proposed avoidance and mitigation measures are generally supported and it is happy that this issue is closed.	HRA Stage 2 and Marine Conservation Assessment Stage 1, including HRA Stage 1 (Document reference 5.12, DCO Volume 5, Version 2). HBC Relevant Representations [RR-127].	Matter agreed with other party
HBC-2024-0023	Terrestrial and freshwater biodiversity	HBC is keen on the provision of green/brown roof. Coastal vegetated shingle or species-rich coastal grassland would be suitable habitat types for a green roof. It is acknowledged that the provision of a green/brown roof at the WRP site is covered by the Design Principles Document (Document reference	The parties agree that the assessments and measures put in place make it possible to address this issue. The Applicant confirms that the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) WRP_17 Environmental mitigation - Green/brown roof states that the main process building (within Zone	Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1).	Matter agreed with other party

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		5.11, DCO Volume 5, Version 1) WRP_17 Environmental mitigation - Green/brown roof. This principle is supported by HBC.	1) will have a green/brown roof to provide open mosaic habitat mitigation within the facility boundary, enhance biodiversity, and to reduce impacts on key views from the south. The specification for the habitat to be provided on the green/brown roof will be in accordance with the Outline LEMP (Document reference 7.7, DCO Volume 7, Version 1) or the relevant approved LEMP as the case may be. The extent of the green/brown roof will be determined at the detailed design stage, covering as large an area as reasonably practicable.	Outline Landscape and Ecology Management Plan (Document reference 7.7, DCO Volume 7, Version 1).	
HBC-2024-SC-0003	Terrestrial and freshwater biodiversity	HBC advised the Applicant that the site of the proposed WRP site and High Lift Pumping Station is known to support a large population of the County Notable Hairy Buttercup as well as other species such as Pyramidal Orchid and Corky-fruited Water-dropwort. The Applicant has undertaken UKHab and NVC surveys for the Project and at least some of these species have been identified as present on the site. ES Chapter 8 Terrestrial and freshwater biodiversity, Volume I (Document reference 6.1, DCO Volume 6), presents assessments and mitigation where required. This approach is agreed with HBC.	The parties agree that the assessments and measures put in place make it possible to address this issue. HBC agrees to close this issue pending review of the assessment and mitigation set out in the ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) which will be submitted with the DCO application. The Applicant has engaged with HBC on 6 November 2026. As set out in HBC Relevant Representations [RR-127] paragraph 4.16, HBC confirms that the overall scope of survey and assessment is considered appropriate and the proposed avoidance and mitigation measures are generally supported and it is happy that this issue is closed.	ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1).. HBC Relevant Representations [RR-127].	Matter agreed with other party
HBC-2024-SC-0002	Terrestrial and freshwater biodiversity	HBC acknowledges that assessment is provided within Chapter 8 Terrestrial and Freshwater Biodiversity in the ES (Document reference 6.1, DCO Volume 6, Version 1). Mitigation measures are also set out within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3, [APP-413] and [APP-414] for documents 2 and 3).	The parties agree that the assessments and measures put in place make it possible to address this issue. HBC agrees, in principle, with the proposed approach pending review of the mitigation set out in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3, [APP-413] and [APP-414] for documents 2 and 3) which will be submitted with the DCO application. The Applicant has engaged with HBC on 6 November 2026. As set out in HBC Relevant Representations [RR-127] paragraph 4.17, HBC confirms that the overall scope of survey and assessment is considered appropriate and the proposed avoidance and mitigation measures are generally supported and it is happy that this issue is closed.	ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1). 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). HBC Relevant Representations [RR-127].	Matter agreed with other party

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HBC-2023-0044	Terrestrial and freshwater ecology - assessment	It is acknowledged that HBC is not part of the district level licence (DLL) for great crested newts (GCN).	The Applicant acknowledges HBC's position. The Applicant confirms that this is reflected within ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1).	ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1).	Matter agreed with other party
HBC-2024-0020	Terrestrial and freshwater ecology - assessment	The ecological enhancement measures at the WRP site are covered by the Design Principles Document. These principles are supported by HBC.	The Applicant acknowledges HBC's position. The relevant principles are set out in the Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1) as follows: • WRP_2 Hermitage Stream; • WRP_15 Environmental mitigation: Boundary planting reinforcement - south and west edge; • WRP_16 Environmental mitigation: Boundary planting reinforcement - north and east; • WRP_17 Environmental mitigation: Green/brown roof; and • WRP_18 Environmental mitigation: Provision of open mosaic habitat. HBC supports, in principle, the proposed approach pending review of the assessment and mitigation set out in the ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1). The Applicant has engaged with HBC on 6 November 2026. As set out in HBC Relevant Representations [RR-127] paragraph 4.17, HBC confirms that the overall scope of survey and assessment is considered appropriate and the proposed avoidance and mitigation measures are generally supported and it is happy that this issue is closed.	Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1). HBC Relevant Representations [RR-127].	Matter agreed with other party
Major Accidents and Disasters					
HBC-2026-0010	Major accidents and disasters	A key concern 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	The Applicant notes that HBC has introduced this matter into the draft SoCG after ISH1 having not raised previously. 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).	Matters subject to further discussion

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		significant concerns regarding the adequacy of the proposed controls and, importantly, their implementation and ongoing management by Southern Water and other responsible bodies. Public confidence in Southern Water has been significantly eroded by its track record in wastewater management and environmental protection in the Borough and across the area the company operates. The Council has raised concerns regarding discharges of untreated sewage into Langstone Harbour, Chichester Harbour and the waters surrounding Hayling Island, and the associated risks to internationally designated habitats, public health, tourism and the local marine economy. These ongoing concerns have contributed to a lack of confidence in Southern Water's ability to manage its infrastructure and protect the local environment. In response to these concerns, HBC unanimously passed a motion of no confidence in Southern Water on 7 October 2026, specifically questioning its ability to protect the local environment, deliver robust infrastructure and maintain public health standards within the Borough. The motion also called for the proposed water recycling element of the Havant Thicket Reservoir project to be paused or re-evaluated until Southern Water can demonstrate improvements in regulatory compliance and environmental performance. The motion is available on the Council's website at https://havant.moderngov.co.uk/documents/s61689/2%20-%20Motion%20of%20no%20confidence%20in%20Southern%20Water.pdf. Although the measures identified in ES Chapter 14 may be appropriate in principle, the Council considers it essential that their implementation, ongoing monitoring and enforcement are clearly secured through the DCO. Given the proposed operational relationship between Southern Water and Portsmouth Water, there must also be clear responsibilities and accountability for water quality monitoring, system failures, emergency responses and any incidents affecting the public water supply. The Council considers that these arrangements must be sufficiently robust to provide confidence that the identified risks will be effectively managed			

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		throughout the lifetime of the Proposed Development.			
Consents and licences					
HBC-2026-0012	Legislation, policy and permits	The Examination should consider what would happen if the standards relied upon in the assessment were updated and replaced. The DCO and supporting documents should secure those adaptive monitoring, response and remediation measures that properly fall within the planning regime, while complementing the applicable permitting arrangements (per NPS WRI 3.8.3). Given the length of time before water recycling will occur it is important that standards are updated to reflect any change in circumstances with respect to potential contaminants.	The Applicant notes that HBC has introduced this matter into the draft SoCG after ISH1 having not raised previously. 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).	Matters subject to further discussion
Carbon and climate change					
HBC-2024-SC-0009	Carbon and climate change - mitigation	HBC raised concerns about the energy intensity of the operational phase of the Project in light of climate change considerations. Efforts to refine the design to minimise energy use and emissions are encouraged and supported. HBC acknowledges the need to reduce greenhouse gas emissions so far as reasonably practicable which will need to be demonstrated through the DCO application.	The Applicant acknowledges HBC's position. The matter has been the subject of discussion. The Applicant considers that the effects of the Project will be not significant when considered against the UK's climate change obligations. The Applicant, through the Outline Carbon Management Plan [APP-423], is setting out a series of measures and controls that will ensure that the Contractor reduces greenhouse gas emissions as far as reasonably practicable. The Applicant has engaged with HBC on 6 November 2026. As set out in HBC Relevant Representations [RR-127] paragraph 5.7, HBC raises no objection in relation to carbon and climate change, subject to the carbon reduction and climate resilience measures identified in the ES being appropriately secured, through the Outline Carbon Management Plan [APP-423] and relevant Requirement in Schedule 2 of the Draft DCO [APP-023]. HBC agrees to close this issue.	Outline Carbon Management Plan [APP-423]. HBC Relevant Representations [RR-127].	Matter agreed with other party
Biodiversity and nature conservation					
HBC-2024-0021	Biodiversity Net Gain/Environmental Net Gain	HBC noted that SuDS features are a great opportunity for biodiversity enhancements – measures should be guided by the local landscape and habitats. The LNRS for Hampshire should provide guidance on locally relevant measures – there may be opportunities to combine landscaping with targeted species conservation measures (e.g. certain coastal plant species). HBC requested that the Biodiversity Net Gain (BNG) requirements should be addressed on-site.	The Applicant has acknowledged the comment. The principles behind the design of the SuDS for the Project are set out in the SuDS Drainage Strategy, as set out in ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1). These principles include how biodiversity features will be incorporated into the SuDS.	ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1). Biodiversity Gain Plan [APP-426].	Matter agreed with other party

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		If required, suitable off-site land should be found. They noted that BNG measures should focus on local habitat types. HBC noted there is potential for BNG enhancements to their own land within Broadmarsh Country Park including: • Grassland and scrub management; and • Formalisation of public access routes. Proposed habitat reinstatement measures, and any actions arising from a requirement or desire for net gain, should be guided by local conditions and landscape and ideally be co-ordinated with the upcoming LNRS for Hampshire. There will be a need to clearly differentiate between impacts and mitigation/compensation /enhancement measures arising from this scheme and the related reservoir scheme: there will be a degree of integration between the Southern Water elements within the Borough and the reservoir scheme. HBC acknowledges a Biodiversity Gain Plan will accompany the DCO application, prioritising BNG delivery within the Order Limits, seeking external sites only where necessary. Engagement is ongoing with LPAs and stakeholders to identify opportunities for BNG, with Broadmarsh Coastal Park a key focus due to its potential for BNG and ENG and its inclusion in Focus Area 1 of the Indicative Environmental Masterplan. The DCO submission includes an Outline CEMP, EMEA, and a Design Principles Document, all cross-referenced with the Outline LEMP.	The Applicant confirmed that the Project and the LNRS for Hampshire were developed concurrently, limiting the ability to fully integrate the final strategy, but precursor biodiversity net gain opportunity areas were used as a basis for habitat creation. Any relevant updates from the draft LNRS shared in the summer were incorporated into the Biodiversity Gain Plan [APP-426], although many initially identified sites were later removed from the final LNRS. The Applicant assured that the LNRS will be considered during detailed design, and any practicable positive changes will be made to maximise BNG, with the potential for further updates as more information becomes available. The Applicant has engaged with HBC on 6 November 2026. As set out in HBC Relevant Representations [RR-127] paragraph 4.23, HBC confirms the final BNG position and aspects of the water-quality modelling may require further assessment as the Project progresses. Subject to these matters being satisfactorily addressed and the identified mitigation, management and monitoring measures being secured, the Council raises no objection in relation to terrestrial and freshwater biodiversity. The Applicant confirms that an updated Biodiversity Gain Plan will be submitted to the relevant authority for approval post-consent. HBC agrees to close this issue.	HBC Relevant Representations [RR-127]	
Contamination and land quality					
HBC-2024-SC-0017	Land quality and ground conditions	HBC expects the Construction Drainage Plan to address excavation of previously tipped waste, and any on-site activities where these are not controlled by another instrument (e.g. permit), and would expect this to be secured as a condition of consent. HBC has reviewed the Applicant's position and is in agreement.	The Applicant agrees that the excavation of waste would need to be included in the drainage management. The Applicant does not envisage the Contractor storing excavated waste for any length of time but any such storage would need to consider the risk from leachate generation and managing incident rainfall to prevent migration of contamination whilst waste is temporarily stored prior to off-site disposal. HBC agrees, in principle, with the proposed approach pending review of the environmental measures secured in the Outline CEMP (Document reference 7.1, DCO Volume 7,	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). HBC Relevant Representations [RR-127].	Matter agreed with other party

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			Version 1 for document 1 of 3, [APP-413] and [APP-414] for documents 2 and 3). The Applicant has engaged with HBC on 6 November 2026. As set out in HBC Relevant Representations [RR-127] paragraph 4.28, HBC considers that the engineering solution now proposed addresses a number of earlier concerns, particularly through the use of tunnelled infrastructure beneath the landfill rather than direct interaction between the pipeline and the waste body. The principle of development is therefore accepted from a contamination perspective. However, a number of matters remain dependent on detailed design and construction methodology, including the treatment of shafts, groundwater and leachate ingress, landfill gas protection, the potential creation of preferential pathways and the management of risks associated with tunnelling beneath the landfill and harbour. The Applicant notes that HBC consider that a number of matters are dependent on detailed design and construction methodology. As outlined in environmental measure LQGC8 in Table 5-1 of 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), detailed Foundation Works Risk Assessments (FWRAs) will be undertaken post consent and in line with CL:AIRE's Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention (CL:AIRE, 2025). HBC agrees to close this issue.		
HBC-2024-SC-0018	Land quality and ground conditions	At the opposite end of the range of depth options, the tunnels would include a greater length installed within the Upper Chalk unit that comprises the Principal Aquifer. Associated risks are discussed under several topic areas, but the Council would highlight the risk of structural voids, mostly addressed in terms of 'as existing' (REAC WE4 relates). Where the external annulus of the pipeline is permitted to act as a preferential pathway, new connections may be formed between existing fissures/conduits within the chalk that could lead to new erosion, possibly rapid, and the formation of new voids in the long term. Mitigation would likely comprise appropriate detailing at the annulus of the tunnel bore, within the affected section of pipe – this might potentially be deployable on a watching-brief basis during tunnelling works in connection	The Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3, [APP-413] and [APP-414] for documents 2 and 3) includes a requirement in relation to voids generally (that is not specific to tunnelling or SPZ) 'A Voids Treatment Protocol will be developed by the Contractor to set out how voids encountered during construction within the chalk will be mitigated to avoid pollution or flow impacts on groundwater bodies. This will be agreed with the Environment Agency'. The ES Appendix 19.9 Outline Water Monitoring Plan [APP-204] includes this requirement: 'During the construction works a watching brief will be employed to detect any unknown karst dissolution features when working	ES Appendix 19.9 Outline Water Monitoring Plan [APP-204]. 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). HBC Relevant Representations [RR-127].	Matter agreed with other party

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		with groundwater management. This risk should ideally be considered under REAC WE2 & WE3 for all tunnelling within the chalk unit in general, rather than limiting it to within the protection zone (SPZ)1c.	directly on/within chalk or where overburden to chalk is anticipated to be less than 10m'. For the tunnels, unlike the open-cut pipeline, the tunnel's negligible annulus is continually filled by grouting as part of the construction process. This prevents any new pathways being formed. HBC agrees, in principle, with the proposed approach pending review of the environmental measures secured in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3, [APP-413] and [APP-414] for documents 2 and 3) and ES Appendix 19.9 Outline Water Monitoring Plan [APP-204]. The Applicant has engaged with HBC on 6 November 2026. As set out in HBC Relevant Representations [RR-127] paragraph 4.28, HBC considers that the engineering solution now proposed addresses a number of earlier concerns, particularly through the use of tunnelled infrastructure beneath the landfill rather than direct interaction between the pipeline and the waste body. The principle of development is therefore accepted from a contamination perspective. However, a number of matters remain dependent on detailed design and construction methodology, including the treatment of shafts, groundwater and leachate ingress, landfill gas protection, the potential creation of preferential pathways and the management of risks associated with tunnelling beneath the landfill and harbour. The Applicant notes that HBC consider that a number of matters are dependent on detailed design and construction methodology. As outlined in environmental measure LQGC8 in Table 5-1 of 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), detailed Foundation Works Risk Assessments (FWRAs) will be undertaken post consent and in line with CL:AIRE's Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention (CL:AIRE, 2025). HBC agrees to close this issue.		
HBC-2024-SC-0031	Land quality and ground conditions	Whilst it is noted that the Preliminary Environmental Information (PEI) Report aims to assess the 'engineering worst case', the worst case option may differ between topics, and it does not	The design for the tunnels and shafts has been sufficiently progressed to provide some certainty on depths, diameters and construction methodology. It is proposed that the pipelines	Outline Foundation Works Risk Assessment [APP-417] - [APP-419].	Matter agreed with other party

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		necessarily follow that the indicative design assessed represents the contaminant worst case. In particular, shaft and pipeline depths are uncertain, as are construction techniques to be employed for the pipeline construction. This is particularly relevant to HBC as the pipeline will be passing either under- or through- a portion of the Harts Farm Landfill that is currently within the ownership of HBC. HBC might wholly or substantially retain liability for the contaminating deposit on its own land in the event that a significant new pathway is created between the leachate generated by the waste body and the protected marine habitat in a way that is more direct than currently occurs (where this requires mitigation).	between the Budds Farm WTW and the WRP site will be driven through the underlying chalk beneath the Harts Farm landfill and will be grouted to prevent a horizontal flowpath being created. The potential risks from contamination present within the underlying ground have been assessed in accordance with current guidance and reported in an Outline Foundation Works Risk Assessment (FWRA) [APP-417] - [APP-419] which sets out how the tunnel construction can be managed to mitigate risks. The detailed design of the tunnel will be supported by a detailed FWRA prepared by the contractor. The necessary pollution prevention measures required to manage risks from contaminants are secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3, [APP-413] and [APP-414] for documents 2 and 3). HBC agrees, in principle, with the proposed approach pending review of the environmental measures secured in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3, [APP-413] and [APP-414] for documents 2 and 3) and Outline FWRA (Document reference 7.4, DCO Volume 7). The Applicant has engaged with HBC on 6 November 2026. As set out in HBC Relevant Representations [RR-127] paragraph 4.28, HBC considers that the engineering solution now proposed addresses a number of earlier concerns, particularly through the use of tunnelled infrastructure beneath the landfill rather than direct interaction between the pipeline and the waste body. The principle of development is therefore accepted from a contamination perspective. However, a number of matters remain dependent on detailed design and construction methodology, including the treatment of shafts, groundwater and leachate ingress, landfill gas protection, the potential creation of preferential pathways and the management of risks associated with tunnelling beneath the landfill and harbour. The Applicant notes that HBC consider that a number of matters are dependent on detailed design and construction methodology. As outlined in environmental measure LQGC8 in Table 5-1 of the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3,	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). HBC Relevant Representations [RR-127].	

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			[APP-413] and [APP-414] for documents 2 and 3), detailed Foundation Works Risk Assessments (FWRAs) will be undertaken post consent and in line with CL:AIRE's Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention (CL:AIRE, 2025). HBC agrees to close this issue.		
HBC-2024-SC-0032	Land quality and ground conditions	HBC noted that concerns relating to a release of drilling mud or fluid finding its way through the surrounding rock and bursting out onto the sea floor.	The risk of drilling fluids escaping upwards under high pressure and blowing out through the bed of the harbour is a risk the drilling Contractor will be managing through their method statements and working procedures. A Drilling Fluid Management Plan (DFMP) will be developed by the Contractor and agreed with the EA and Natural England prior to commencement of relevant construction activities (i.e. trenchless construction activities requiring the use of drilling fluids) 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). HBC agrees, in principle, with the proposed approach pending review of the environmental measures secured in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3, [APP-413] and [APP-414] for documents 2 and 3). The Applicant has engaged with HBC on 6 November 2026. As set out in HBC Relevant Representations [RR-127] paragraph 4.28, HBC considers that the engineering solution now proposed addresses a number of earlier concerns, particularly through the use of tunnelled infrastructure beneath the landfill rather than direct interaction between the pipeline and the waste body. The principle of development is therefore accepted from a contamination perspective. However, a number of matters remain dependent on detailed design and construction methodology, including the treatment of shafts, groundwater and leachate ingress, landfill gas protection, the potential creation of preferential pathways and the management of risks associated with tunnelling beneath the landfill and harbour. The Applicant notes that HBC consider that a number of matters are dependent on detailed design and construction methodology. As outlined in environmental measure LQGC8 in Table 5-1 of the Outline Construction Environmental Management Plan (Document reference 7.1,	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). HBC Relevant Representations [RR-127].	Matter agreed with other party

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			DCO Volume 7, Version 1 for document 1 of 3, [APP-413] and [APP-414] for documents 2 and 3), detailed Foundation Works Risk Assessments (FWRAs) will be undertaken post consent and in line with CL:AIRE's Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention (CL:AIRE, 2025). HBC agrees to close this issue.		
HBC-2024-SC-0033	Land quality and ground conditions	It is anticipated that any measures necessary for managing contamination risks for the anticipated lifetime of the development, or for managing the construction phase pollution risks, will be secured via the Construction Method Statements and CEMP.	An Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3, [APP-413] and [APP-414] for documents 2 and 3) is submitted with the DCO, including the necessary measures relevant for the construction phase of the Project. There will be a requirement 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) for the Contractor to prepare a detailed CEMP following consent being granted for the Project, and the detailed CEMP will be prepared in accordance with the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3, [APP-413] and [APP-414] for documents 2 and 3). HBC agrees, in principle, with the proposed approach pending review of the environmental measures secured in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3, [APP-413] and [APP-414] for documents 2 and 3). The Applicant has engaged with HBC on 6 November 2026. As set out in HBC Relevant Representations [RR-127] paragraph 4.28, HBC considers that the engineering solution now proposed addresses a number of earlier concerns, particularly through the use of tunnelled infrastructure beneath the landfill rather than direct interaction between the pipeline and the waste body. The principle of development is therefore accepted from a contamination perspective. However, a number of matters remain dependent on detailed design and construction methodology, including the treatment of shafts, groundwater and leachate ingress, landfill gas protection, the potential creation of preferential pathways and the management of risks associated with tunnelling beneath the landfill and harbour. The Applicant notes that HBC consider that a number of matters are dependent on detailed	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). HBC Relevant Representations [RR-127].	Matter agreed with other party

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			design and construction methodology. As outlined in environmental measure LQGC8 in Table 5-1 of 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), detailed Foundation Works Risk Assessments (FWRAs) will be undertaken post consent and in line with CL:AIRE's Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention (CL:AIRE, 2025). HBC agrees to close this issue.		
HBC-2024-SC-0034	Land quality and ground conditions	In particular, given the environmental receptor for the contamination risks, HBC would recommend that the Construction Drainage Plan and the Waste Management Plan should include a narrative specifically addressing the dewatering of shaft excavations advanced through the tidal leachate table. REAC WE10 acknowledges the risk of such waters arising, and the need to manage that risk, but it does not explicitly link this commitment with a proactive management- recording- or monitoring-process.	Procedures to manage water quality in any discharges will be managed through the required permitting process which the Contractor will be responsible for in line with the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3, [APP-413] and [APP-414] for documents 2 and 3). HBC agrees, in principle, with the proposed approach, pending review of the environmental measures secured in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3, [APP-413] and [APP-414] for documents 2 and 3). The Applicant has engaged with HBC on 6 November 2026. As set out in HBC Relevant Representations [RR-127] paragraph 4.28, HBC considers that the engineering solution now proposed addresses a number of earlier concerns, particularly through the use of tunnelled infrastructure beneath the landfill rather than direct interaction between the pipeline and the waste body. The principle of development is therefore accepted from a contamination perspective. However, a number of matters remain dependent on detailed design and construction methodology, including the treatment of shafts, groundwater and leachate ingress, landfill gas protection, the potential creation of preferential pathways and the management of risks associated with tunnelling beneath the landfill and harbour. The Applicant notes that HBC consider that a number of matters are dependent on detailed design and construction methodology. As outlined in environmental measure LQGC8 in Table 5-1 of the Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3,	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). HBC Relevant Representations [RR-127].	Matter agreed with other party

Row ID	Topic	Summary of HBC issue	Latest position in resolving the issue	Application document reference	Status
			[APP-413] and [APP-414] for documents 2 and 3), detailed Foundation Works Risk Assessments (FWRAs) will be undertaken post consent and in line with CL:AIRE's Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention (CL:AIRE, 2025). HBC agrees to close this issue.		
HBC-2024-SC-0035	Land quality and ground conditions	HBC would also recommend that the Waste Management Plan present a narrative plan for characterisation/streaming, sorting/treatment/processing/recovery and disposal of excavated landfill waste, providing clarity on where each activity is expected to be undertaken, and which falls under the jurisdiction of an environmental permit.	Waste arising from the existing landfill will be removed as waste under transfer notes and consignment notes for hazardous waste if these are required. No treatment of waste is envisaged on site and as such a permit for waste treatment will not be required. RWM5 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) requires that the Site Waste Management Plan (SWMP) be produced by the contractor, which will include details of the methodology for testing and classifying waste in accordance with relevant legislation and guidance. Specific measures will be included in the SWMP for implementation during construction to ensure that waste is correctly classified and that hazardous and non-hazardous waste are not mixed. HBC agrees, in principle, with the proposed approach pending review of the environmental measures secured in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3, [APP-413] and [APP-414] for documents 2 and 3). The Applicant has engaged with HBC on 6 November 2026. As set out in HBC Relevant Representations [RR-127] paragraph 4.28, HBC considers that the engineering solution now proposed addresses a number of earlier concerns, particularly through the use of tunnelled infrastructure beneath the landfill rather than direct interaction between the pipeline and the waste body. The principle of development is therefore accepted from a contamination perspective. However, a number of matters remain dependent on detailed design and construction methodology, including the treatment of shafts, groundwater and leachate ingress, landfill gas protection, the potential creation of preferential pathways and the management of risks associated with tunnelling beneath the landfill and harbour.	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). HBC Relevant Representations [RR-127].	Matter agreed with other party

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			The Applicant notes that HBC consider that a number of matters are dependent on detailed design and construction methodology. As outlined in environmental measure LQGC8 in Table 5-1 of 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), detailed Foundation Works Risk Assessments (FWRAs) will be undertaken post consent and in line with CL:AIRE's Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention (CL:AIRE, 2025). HBC agrees to close this issue.		
HBC-2025-0006	Land quality and ground conditions	HBC considers that the proposed WRP site pipework and associated shafts/tunnelling introduce additional contaminated land and landfill gas risks (including an actively gassing site, potential new pathways towards the reservoir, and the need to cross the landfill bund) that are not yet adequately evidenced/mitigated. HBC expects the DCO submission to align the developing construction design with the contamination conceptual model by providing (i) a construction CSM for key areas (e.g. Budds Farm WTW, WRP site and relevant pipeline sections) setting out shaft/tunnel parameters, construction controls for groundwater/leachate/gas, antibuoyancy and detailing at annulus/base/penetrations, the trenchless techniques proposed, and section profiles against geology/topography and constraints; and (ii) an updated geoenvironmental assessment/contamination CSM based on the construction CSM addressing changes to gas/leachate pathways, measures to maintain hydraulic separation and prevent gas buildup/ignition in retained voids, likely waste removal volumes and implications, and the degree of infiltration/reduction/betterment at the WRP site. HBC notes that use of diaphragm wall panels advancing without open excavation helps address concerns around trench stability, air exchange and leachate migration compared with alternatives (e.g. secant piling).	The ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1) has assessed the ground investigation data to determine the potential for impacts arising from construction of the WRP on the former landfill including the shafts and tunnels. The ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1) sets out measures to mitigate risks from landfill gas and leachate which will be implemented during the construction and operational phases. The Outline FWRA [APP-417] - [APP-419] provides details of the shaft and tunnel construction as developed to this stage and provides a conceptual site model for these elements of the project. The Contractor will further develop the detailed design and prepare construction management plans to mitigate any potential risks arising from the landfill. HBC agrees, in principle, with the proposed approach pending review of the environmental measures secured in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3, [APP-413] and [APP-414] for documents 2 and 3), details of the Outline FWRA [APP-417] - [APP-419] and mitigation measures secured in the ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1). The Applicant has engaged with HBC on 6 November 2026. As set out in HBC Relevant Representations [RR-127] paragraph 4.28, HBC considers that the engineering solution now proposed addresses a number of earlier concerns, particularly through the use of tunnelled	ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1). Outline Foundation Works Risk Assessment [APP-417] - [APP-419]. 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). HBC Relevant Representations [RR-127].	Matter agreed with other party

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			infrastructure beneath the landfill rather than direct interaction between the pipeline and the waste body. The principle of development is therefore accepted from a contamination perspective. However, a number of matters remain dependent on detailed design and construction methodology, including the treatment of shafts, groundwater and leachate ingress, landfill gas protection, the potential creation of preferential pathways and the management of risks associated with tunnelling beneath the landfill and harbour. The Applicant notes that HBC consider that a number of matters are dependent on detailed design and construction methodology. As outlined in environmental measure LQGC8 in Table 5-1 of 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), detailed Foundation Works Risk Assessments (FWRAs) will be undertaken post consent and in line with CL:AIRE's Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention (CL:AIRE, 2025). HBC agrees to close this issue.		
Land use and agriculture					
HBC-2025-0010	Land use and agriculture	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 (Document reference 7.9, DCO Volume 7, Version 1) 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 Applicant acknowledges HBC's position.	Scheme Development Report [APP-073] - [APP-075]. Outline Skills and Employment Plan (Document reference 7.9, DCO Volume 7, Version 1).	Matter agreed with other party
Noise and vibration					
HBC-2025-0003	Noise and vibration - assessment	Concerning the noise from nighttime access construction works, HBC notes that the nearest residential receptor is located more than 450 metres from any proposed nighttime works. Based on the information provided, and notwithstanding the site's history and the settlement potential of local made soils, it is not anticipated that the Project will include nighttime piling, installation of vibro-stone columns, dynamic ground	The Applicant intends to schedule the proposed works in Havant at night to reduce the impacts of traffic management and driver delay during the construction period. The Applicant has concluded the effects of noise from works (lasting no more than 10-days in any 15) will not be significant. This is addressed in the ES Chapter 15 Noise and vibration [APP-094].	ES Chapter 15 Noise and vibration [APP-094]. Outline Construction Environmental Management Plan (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of	Matter agreed with other party

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		improvement, or any other activities likely to generate short-duration impact noise. This response is made on the assumption that these activities are not proposed, and that the scope of consultation is limited to the access works and their impacts on noise-sensitive human receptors only. Should these assumptions prove incorrect, this response should not be taken as confirmation that the mitigation measures described are sufficient to justify omission of a detailed noise assessment. The impact of construction noise on ecological receptors is outside the scope of this response. Taking these factors into account, alongside the self-imposed programme limitations and the general Outline CEMP provisions for noise mitigation, HBC is satisfied that the environmental context of this access point is such that complaints are unlikely to occur. Accordingly, it is agreed that a detailed noise assessment need not be undertaken; it is self-evident that, on the basis described above, the outcome would be 'not significant'.	Noise control measures identified as Best Practicable Means 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) will be applied, irrespective of the duration of construction works. HBC agrees to close this issue pending review of the environmental measures secured in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3, [APP-413] and [APP-414] for documents 2 and 3) and mitigation measures secured in the ES Chapter 15 Noise and vibration [APP-094]. The Applicant has engaged with HBC on 6 November 2026. As set out in HBC Relevant Representations [RR-127] paragraph 5.17, HBC raises no objection in relation to noise and vibration, subject to the mitigation, monitoring and construction controls identified in the ES [APP-080 to APP-0411 – 332 documents] and 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) being appropriately secured and implemented. These measures are secured by corresponding requirement in Schedule 2 to the Draft DCO [APP-023]. HBC agrees to close this issue.	3, [APP-413] and [APP-414] for documents 2 and 3). Draft Development Consent Order [APP-023]. HBC Relevant Representations [RR-127].	
HBC-2024-SC-0021	Noise and vibration - mitigation	HBC has made suggestions on specific wording to be included or requirements to be included in the Outline CEMP and these are agreed.	The parties agree that the construction noise and vibration assessment methodology is appropriate and that receptors, baseline monitoring locations and methodologies will be agreed with the relevant LPA prior to commencement and secured through the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3, [APP-413] and [APP-414] for documents 2 and 3). The Applicant confirms receptors are identified in ES Chapter 15 Noise and vibration [APP-094] and that baseline surveys were undertaken following LPA consultation. Construction working hours and mitigation will be secured via 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)/Code of Construction Practice, applying Best Practicable Means and BS 5228-1/2, with standard mitigation, monitoring and a complaints strategy agreed before works start; works outside standard hours will be limited, short-term and subject to prior written LPA approval. While HBC seeks tighter standard hours	ES Chapters [APP-080 to APP-0411 – 332 documents]. ES Chapter 15 Noise and vibration [APP-094]. 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). HBC Relevant Representations [RR-127].	Matter agreed with other party

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			and raises concerns regarding Saturday afternoons and potential 24-hour tunnelling effects, the Applicant maintains the proposed hours reflect accepted major infrastructure practice and that assessments predict no significant residual effects where mitigation is implemented; nevertheless, additional location- or activity-specific restrictions (including on Saturday afternoons), avoidance of 24-hour tunnelling beneath dwellings where practicable, advance notification, and further mitigation (e.g. enhanced screening, quieter plant/methods, phasing to provide respite) will be adopted where required to avoid LOAEL exceedances within the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3, [APP-413] and [APP-414] for documents 2 and 3). References to withdrawn BS 5228-4 will not be included. HBC agrees to close this issue pending review of the environmental measures secured in the Outline CEMP (Document reference 7.1, DCO Volume 7, Version 1 for document 1 of 3, [APP-413] and [APP-414] for documents 2 and 3) and mitigation measures secured in the ES Chapter 15 Noise and vibration [APP-094]. The Applicant has engaged with HBC on 6 November 2026. As set out in HBC Relevant Representations [RR-127] paragraph 5.17, HBC raises no objection in relation to noise and vibration, subject to the mitigation, monitoring and construction controls identified in the ES [APP-080 to APP-0411 – 332 documents] and 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) being appropriately secured and implemented through inclusion 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 by corresponding requirement in Schedule 2 to the Draft DCO [APP-023]. HBC agrees to close this issue.	Draft Development Consent Order [APP-023].	
Socioeconomics, tourism, recreation, and health					
HBC-2025-0004	Socioeconomic, tourism, recreation and health	HBC requested the Applicant to review the Construction Industry Training Board (CITB) National Skills Academy for Construction client-based approach and incorporate relevant KPIs and local priorities (e.g., focus on NEETs, entry-level and green skills, and potential construction academy collaboration) into the draft Outline SEP.	The potential impacts on employment have been assessed in Chapter 17, Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1). The Applicant has acknowledged HBC's comment in the preparation of the Outline SEP (Document reference 7.9, DCO Volume 7, Version 1) to	ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1).	Matter agreed with other party

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			reflect its request for greater alignment to CITB guidance. The Applicant has engaged with HBC on 6 November 2026. As set out in HBC Relevant Representations [RR-127] paragraph 4.36, HBC support the Project, in particular the proposed Outline Skills and Employment Plan (Document reference 7.9, DCO Volume 7, Version 1) and the opportunities this would provide for local employment, training and skills development. HBC agrees to close this issue.	Outline Skills and Employment Plan (Document reference 7.9, DCO Volume 7, Version 1). HBC Relevant Representations [RR-127].	
HBC-2026-0013	Public health	The ES acknowledges the potential health and safety concerns associated with major accidents and disasters. However, ES Chapter 17 also considers the stress and anxiety that may arise from the public's perception of these risks. Whilst paragraph 17.8.145 of the ES refers to the Water Quality Regulations and the regulatory role of the Drinking Water Inspectorate, the Council considers that these safeguards do not, in themselves, address all concerns with respect to contaminants such as CEC/PFAs.	The Applicant notes that HBC has introduced this matter into the draft SoCG after ISH1 having not raised previously. 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)	Matters subject to further discussion
Traffic and transport					
HBC-2024-SC-0024	Traffic and transport - mitigation	The WRP site is located within a key employment area where existing congestion and reliance on timely servicing make the road network highly sensitive. HBC requires robust traffic management, clear and timely communication with businesses and residents, and effective coordination with other planned works to minimise disruption. Access to the site is proposed from Harts Farm Way, however the construction and operational access arrangements have not yet been agreed with the Local Highway Authority and require further discussion, drawing on previous consideration of access in this area. HBC highlights the traffic sensitivity of Harts Farm Way and the Park Road/A27 Langstone Junction corridor, supports construction traffic routing that avoids the town centre, and raises concern about the scale of HGV movements associated with excavated material, including whether rail alternatives have been considered. Detailed highway matters are deferred to HCC and National Highways.	The Applicant has developed the Framework Construction Traffic Management Plan (CTMP) [APP-415] and the Traffic Management Strategy (TMS) [APP-416] as part of the DCO in consultation with the relevant highway authorities. Detailed TMS documents will be prepared by the Contractor post-consent. As agreed with HCC, all construction traffic will access the WRP site from the south, resulting in no impact on the West Street level crossing. The principal highway impact relates to the construction of the WRP site access, which will be undertaken at night to reduce disruption, with all traffic management, HGV restrictions, coordination with HCC and National Highways, and community notification secured through the approved management plans. HBC agrees to close this issue pending review of the relevant DCO documents post-submission. The Applicant has engaged with HBC on 6 November 2026. The Applicant acknowledges the Council's concerns regarding traffic impacts on the local highway network, including Harts Farm Way. The Framework CTMP [APP-415] and appended Framework Construction Worker Travel	Framework Construction Traffic Management Plan (including Framework Construction Worker Travel Plan and Framework Rights of Way Management Plan) [APP-415]. Traffic Management Strategy [APP-416]. ES Chapter 18 Traffic and Transport [APP-097]. HBC Relevant Representations [RR-127].	Provisional agreement pending application evidence

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			Plan (CWTP) include several measures to manage the traffic impacts in this location. As detailed in the ES Chapter 18 Traffic and transport [APP-097], no significant effects have been predicted at this location with regards to traffic and transport during the construction or operation of the Project. The Applicant welcomes the Council's position of no objection with regards to traffic and transport, subject to the satisfaction of HCC as the Local Highway Authority, as per HBC Relevant Representations [RR-127] paragraph 4.47.		
Flood risk and water environment					
HBC-2025-SC-0001	Water environment - Water Framework Directive	HBC is concerned about the potential for water quality deterioration and ecological harm from the proposed scheme, especially due to the risk of eutrophication. HBC insists on robust, evidence-based assurances and further treatment measures before any approval is granted, and expects the project to deliver net environmental benefits.	The Applicant's updated water quality modelling demonstrates that operation of the Project would result in no deterioration to water quality or aquatic ecology in Havant Thicket Reservoir or downstream water bodies, with no significant changes to chemistry, physico-chemistry or salinity, including at Eastney Long Sea Outfall (LSO) and the Hermitage Stream. Following further assessment and design updates—including revised reservoir modelling, embankment design and a commitment to phosphorus removal via a High Rejection Rate Membrane treatment stage at the WRP site —the assessment predicts no significant adverse effects, addresses previous eutrophication concerns, and improves compliance with the WER. The technical evidence is fully reported in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1), the supporting modelling appendices, the WER compliance assessment, and the submitted ES Appendix 19.7 Nutrient Assessment [APP-202]. HBC agrees to close this issue pending review of the relevant DCO documents post-submission. The Applicant has engaged with HBC on 6 November 2026. As set out in HBC Relevant Representations [RR-127] paragraph 4.49, in accordance with Para 3.8.3 of the National Policy Statement for Water Resources Infrastructure (2025) and NDMP W4 of the NPPF (2026), the Council considers that the Examination should be satisfied that the potential effects on water quality have been adequately assessed and that the treatment and operational arrangements are sufficiently robust to maintain the standards relied upon in the ES. HBC Relevant Representations [RR-127] paragraph 5.51, concludes that the final	ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1). ES Appendix 19.7 Nutrient Assessment [APP-202]. ES Appendix 19.9 Outline Water Monitoring Plan [APP-204]. Draft Development Consent Order [APP-023]. HBC Relevant Representations [RR-127].	Provisional agreement pending application evidence

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			monitoring and operational arrangements should clearly establish what is to be monitored, the relevant trigger levels, reporting requirements and the actions to be taken where those levels are exceeded. Subject to the Environment Agency and other relevant statutory bodies being satisfied that the potential effects have been adequately assessed and can be appropriately controlled, the Council raises no objection in principle in relation to impacts upon the water environment. The Applicant's proposed approach to water quality monitoring is described in detail in ES Appendix 19.9 Outline Water Monitoring Plan [APP-204]. Specific trigger levels will be developed and agreed with the Environment Agency prior to the commencement of construction as part of a Water Monitoring Plan, which is secured through Requirement 16 in Part 1 of Schedule 2 of the Draft DCO [APP-023]. The Applicant notes that the Council is satisfied (subject to Environment Agency and other relevant statutory bodies' approval) that the potential effects have been adequately assessed and can be appropriately controlled.		
HBC-2024-SC-0012	Water environment (including flood risk) - assessment	HBC is content that the matter of flood risk at the WRP site and at Budds Farm WTW is being appropriately considered through submission of a FRA as part of the DCO Application.	The Applicant acknowledges HBC's position.	ES Appendix 19.1 Flood Risk Assessment [APP-189] - [APP-196].	Matter agreed with other party
HBC-2024-SC-0006	Water environment (including flood risk) - mitigation	Water quality modelling will include worst case scenarios and consideration of what mitigation measures are in place to prevent an operational failure. There is a heightened risk of potential impacts to the water environment, with a range of works taking place within and in close proximity to watercourses, as well as groundwater sources, and through the operational phase of the scheme. HBC welcomes measures proposed to avoid and mitigate construction impacts, and continuing work to understand and manage the operational effects on the water environment of HBC's watercourses, the Solent and the new Havant Thicket Reservoir.	The Applicant noted that the proposed modelling has considered the worst case operational scenarios, the worst-case concentration of contaminants in the operational flow. In line with established guidance, as agreed with relevant stakeholders, the ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) does not assess emergency scenarios as its scope is to assess likely worst case effects. Design controls are in place to reduce the risk of emergency scenarios materialising. This includes remote monitoring of recycled water prior to its release into the Havant Thicket Reservoir. The ES Chapter 14 Major accidents and disasters [APP-093] provides further consideration of emergency scenarios, including system failures. A detailed assessment has been made of potential impacts on the water environment in Chapter 19 Water environment (Document	ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1). ES Chapter 14 Major accidents and disasters [APP-093]. 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). HBC Relevant Representations [RR-127].	Matter agreed with other party

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			reference 6.1, DCO Volume 6, Version 1) of the ES. This includes surface and groundwater (including offshore/coastal impacts). Results from water quality modelling at the Eastney LSO and reservoir are presented in the ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1). Suitable mitigation measures are identified in the ES and outlined 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).HBC agrees to close this issue pending review of the relevant DCO documents post-submission. The Applicant has engaged with HBC on 6 November 2026. As set out in HBC Relevant Representations [RR-127] paragraph 4.48, HBC recognises that the draft Statement of Common Ground records agreement that flood risk at the Water Recycling Plant site and Budds Farm WTW has been appropriately considered through the submitted FRA [APP-189 to APP-196]. HBC agrees to close this issue.		
HBC-2026-0014	Water Quality (at Havant Thicket Reservoir and further downstream and drinking water quality)	At a national level, the Water Resources Infrastructure National Policy Statement (WRINPS, 2025) provides the principal policy framework for the consideration of water quality impacts. Section 4.15 requires the potential effects of development on water quality, water resources and the wider water environment to be appropriately assessed. It recognises the potential for such effects to impact human health and sensitive environmental habitats and identifies the importance of preventing deterioration in the status of water bodies. Paragraph 3.8.3 of the WRINPS recognises that the regulation of processes, emissions and discharges falls principally within separate environmental regulatory regimes, and that the examination should not duplicate these controls. However, the potential impacts must still be assessed as part of the DCO process. The Council therefore considers it important that the Examining Authority is satisfied that the potential effects on water quality have been adequately assessed and that the proposed treatment, monitoring and operational arrangements are sufficiently robust to maintain the standards relied upon in the ES. The Council recognises the Environment Agency's role in regulating operational discharges but considers that the examination should provide confidence that	The Applicant notes that HBC has introduced this matter into the draft SoCG after ISH1 having not raised previously. 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).	Matters subject to further discussion

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		the necessary controls and responsibilities are clearly established. Of particular concern to the Council are Contaminants of Emerging Concern (CECs) and Per- and polyfluoroalkyl substances (PFAS). As acknowledged at paragraph 19.8.104 of the ES, these are substances which could potentially affect water quality, ecology and human health but are not currently subject to specific environmental quality standards or regulatory limits. The Council acknowledges the monitoring undertaken by the applicant, including testing of over 400 substances, and the findings that the proposed treatment processes would substantially reduce contaminant concentrations. However, concerns remain regarding the management of substances which are not currently regulated, particularly where their potential long-term effects are not yet fully understood. The Council therefore considers it essential that monitoring and treatment arrangements are capable of responding to emerging scientific evidence, advances in treatment technology and changes to regulatory requirements, to ensure that water quality and public health continue to be protected throughout the operational lifetime of the Proposed Development.			
Cumulative and in-combination effects					
HBC-2025-0007	Cumulative effects assessment	HBC agrees that the longlist of developments considered as of May 2025 was appropriate and confirms that sufficient engagement has taken place. HBC also agrees with the shortlist of sites and schemes taken forward for the Cumulative Effects Assessment (CEA). The approach of including a figure in the ES showing only shortlisted developments, with full details provided in ES Appendix 20.1, is considered acceptable.	The Applicant acknowledges HBC's position. The Applicant confirms that the ES Figure 20.1 Projects considered as part of the cumulative effects assessment – shortlist [APP-410] is included in the ES Chapter 20 Cumulative and in-combination effects [APP-099]. The Applicant confirms that the full details are provided in ES Appendix 20.1 List of 'other developments' – longlist and shortlist [APP-208].	ES Appendix 20.1 List of 'other developments' – longlist and shortlist [APP-208]. ES Figure 20.1 Projects considered as part of the cumulative effects assessment – shortlist [APP-410]. ES Chapter 20 Cumulative and in-combination effects [APP-099].	Matter agreed with other party

4 Signatories

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

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

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®