Hampshire Water Transfer and Water Recycling Project

Draft Statement of Common Ground - Environment Agency

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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 the Environment Agency (EA) 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 EA's role in the DCO process is to regulate and advise on matters relating to the water environment, including water quality, hydrology, flood risk, groundwater, land contamination, and compliance with relevant environmental legislation. This SoCG sets out the areas of agreement and those requiring further discussion specifically in relation to matters within the EA's 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 the EA's Relevant Representation [RR-102], which sets out the EA'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) the Environment Agency.

1.3.2 Collectively, Southern Water Services Limited and the Environment Agency 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 the EA 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 the EA 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 the EA throughout the development of the DCO application and continues to engage with the EA 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 17 April 2026, and has been updated to reflect engagement with the EA since that date, where appropriate. The SoCG is currently unsigned but has been reviewed and agreed by the relevant officer(s) at the EA. 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 the EA 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 Review Meeting 1	First review of the draft SoCG post-submission; to update the latest position and status of issues which had not been agreed in the pre-Examination phase.	16/07/2026
SoCG Review Meeting 2	Second review of the draft SoCG post-submission; to further update the latest position and status of issues not yet agreed.	13/08/2026
Draft DCO Meeting 1	To discuss the drafting of the draft Development Consent Order, including: the relationship between Article 5 and the ongoing contractual discussions with Portsmouth Water in relation to the use of Havant Thicket Reservoir; the need for the various provisions within and modifications made by Schedule 8; and the draft Protective Provisions for the EA.	11/09/2026
SoCG Review Meeting 3	Third review of the draft SoCG post-submission; presentation of Project updates (water quality modelling and flood risk topics) to forward issue resolution.	24/09/2026

Name	Purpose	Date
Draft DCO Meeting 2	For EA to provide detailed comments on the Draft DCO.	19/10/2026
Regulators meeting	For the key regulators, including the EA, to meet to discuss their respective positions with regard to the project.	09/11/206
SoCG Review Meeting 4	Fourth review of the draft SoCG to reach agreement on the updates in advance of Examination Deadline 1.	16/11/2026

3 Statement of Common Ground

3.1.1 Table 3-1 provides a summary of the key matters discussed between the Applicant and the EA 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 Environment Agency issue	Latest Position in Resolving the Issue	Application Document Reference	Status
DCO and planning					
EA-ES-013	Scheme development	The Environment Agency expressed a preference for the Combined Tunnel Option. The Environment Agency agrees to the Project's use of Portsmouth Water's pipelines between Bedhampton Springs and Havant Thicket Reservoir. The Environment Agency agrees to the Pipelines between the WRP site and Bedhampton Springs being partially located above ground to reduce below ground works with the Source Protection Zone at Bedhampton Springs.	The preferred Combined Tunnel Option has been taken forward for the DCO application as Portsmouth Water has secured planning permission for this pipeline.		Matter agreed with other party
EA-ES-073	Need for the project and alternatives	The Environment Agency recognises the increasing challenge of water scarcity and that investment in new water supply options, alongside ambitious demand reduction, is needed in Hampshire and Isle of Wight (Southern Water's Western Area Water Resource Zone) to enable secure and resilient supplies, support growth and protect the environment. Progressing options such as water recycling marks a transition to new water supplies, that are less dependent upon the uncertainties of rainfall, are well established elsewhere around the world and can ensure resilient supplies in a changing climate. The Applicant faces a significant lack of water resources resilience in its Western Area, as evidenced in its water resource management planning. Large scale water supply options are required to address this and to protect the internationally recognised chalk rivers of the Test and Itchen. These rivers are important for the genetically unique, Atlantic salmon metapopulation that relies on them, and which are at critical risk. The Applicant's Project is a key water resources solution in its emerging water resources management plan (WRMP24) which would have a central role in addressing its baseline deficit forecast in Hampshire. Through robust optioneering, both through the RAPID Gated Process and the WRMP process, the Applicant has demonstrated to the Environment Agency's satisfaction that there is a lack of viable alternatives to the Applicant's Project that can provide the necessary scale of water supply resilience needed, and in the time frames required.	The Applicant is in agreement with and welcomes the Environment Agency's position.		Matter agreed with other party

Row ID	Topic	Summary of Environment Agency issue	Latest Position in Resolving the Issue	Application Document Reference	Status
Above ground plant, specific sites and pipeline					
EA-ES-076	Washouts and Break Pressure Tank overflows	The Environment Agency is satisfied with the approach of using ES Chapter 14 Major accidents and disasters [APP-093] to report the assessment of potential flood risk arising from emergency washout or overflow discharges.	The Applicant has explained that only in an emergency scenario (considered to be 'operationally exceptional' and not expected to occur during the operation of the Project) would source water potentially be released via a washout valve or Break Pressure Tank (BPT) overflow to the environment. Therefore, the potential impacts of use of washouts/BPT overflows in an emergency scenario are considered as part of ES Chapter 14 Major accidents and disasters [APP-093] (and not assessed in any other ES chapters or the Habitats Regulations Assessment). The Environment Agency is satisfied with this approach.	ES Chapter 14 Major accidents and disasters [APP-093]	Matter agreed with other party
EA-PEI-011	Washouts and Break Pressure Tank overflows	The Environment Agency is in agreement that, as there is no proposal to undertake discharge activity from washouts or Break Pressure Tanks, no permit is required.	The Applicant has confirmed that discharges from washouts or from Break Pressure Tank (BPT) overflows during the testing and commissioning stage, and from planned operational maintenance, would be captured and taken for disposal at a suitably licensed facility. The Applicant does not consider that a permit is necessary for such operations, since no discharge to the environment will take place from washouts or BPTs as part of the operation and maintenance of the Project. Only in exceptional emergency situations - such as major accidents or disasters - would an emergency drain down be required, during which source water from washouts or BPT overflows could be released to the environment. Such an event is not foreseen or anticipated as part of the Project; it is not anticipated that there will be any burst pipes during the operation of the Project. The Applicant therefore does not consider that it is necessary to apply for a permit for such an event, as there is no proposal to undertake discharge activity. The Environment Agency is in agreement that, as there is no proposal to undertake discharge activity from washouts, no permit is required.		Matter agreed with other party
EA-PEI-008	Washouts and Break Pressure Tank overflows	The Environment Agency requested explanation of the approach to washout and Break Pressure Tank design and mitigation of potential flood-related impacts of emergency releases to the environment.	Break Pressure Tank locations are known but the location of washouts will not be determined until detailed design stage. Mitigation for the risk of flooding and pipe leak during the operation of the Project is secured in Operational Environmental Management Plan	ES Chapter 14 Major accidents and disasters [APP-093] Operational Environmental Management Plan [APP-422]	Provisional agreement pending application evidence

Row ID	Topic	Summary of Environment Agency issue	Latest Position in Resolving the Issue	Application Document Reference	Status
			[APP-422]. It requires an Emergency Response Plan to be produced at a future stage. The emergency use of washouts and the Project's interface with local resilience forums was discussed with the Environment Agency. The Project will be included in the national and local resilience forums management and response processes under the Civil Contingencies Act 2004 (such as Local Resilience Forums). This means additional requirements will be placed on the Contractor to ensure robust inclusion in Local Resilience Forum planning. The Environment Agency expressed satisfaction with this approach. The Environment Agency is in provisional agreement with the mitigation measures for potential impacts of emergency discharges, having reviewed ES Chapter 14 Major accidents and disasters [APP-093] and Operational Environmental Management Plan (Document reference 7.7, DCO Volume 7. However, the Environment Agency has asked for further information on flood risk that could arise from Break Pressure Tank overflows and the Applicant is continuing to engage on this matter.		
EA-EX-002	Washouts and Break Pressure Tank overflows	The Environment Agency is satisfied with the content of the Invasive Non Native Species Biosecurity Plan, secured in Schedule 2 of the Draft Development Consent Order [APP-023], with regard to mitigation of INNS risk associated with emergency releases of water.	The risk of INNS from the release of water from an emergency washout release or pipe leak will be mitigated through the preparation and implementation of an Emergency INNS Management Plan (EIMP) which will be developed by the Contractor post-consent as outlined in Invasive Non Native Species INNS Biosecurity Plan [APP-425] and secured in Draft Development Consent Order [APP-023]. The EIMP would set out the processes and procedure for releasing and managing water in an emergency, including procedures to assess and identify the current threat of INNS associated with the emergency event, for containment and eradication and a plan for regular monitoring and follow-up.	Draft Development Consent Order [APP-023] Invasive Non Native Species INNS Biosecurity Plan [APP-425]	Matter agreed with other party
Design and construction					
EA-ES-072	Scheme development	The Environment Agency is satisfied with the scheme development work and embedding of primary mitigation that has been undertaken to minimise impacts of the Project on sensitive environmental receptors.	The Environment Agency has been engaged throughout the design development for the Project via Environmental Impact Assessment (EIA) Working Group and Technical Working Group sessions. Environment Agency input on avoidance criteria/primary mitigation has been fed	Scheme Development Report [APP-073] - [APP-075] ES Appendix 3.1 Primary mitigation [APP-103]	Matter agreed with other party

Row ID	Topic	Summary of Environment Agency issue	Latest Position in Resolving the Issue	Application Document Reference	Status
			into the scheme development process and incorporated as far as possible. Design decisions have been based on a multi-disciplinary assessment that weighs potential environmental and construction constraints and opportunities. Scheme Development Report [APP-073] - [APP-075] sets out in detail the process that has been taken to design the Project and it explains how alternatives have been considered. Primary mitigation is presented in ES Appendix 3.1 Primary mitigation [APP-103].		
EA-RG2-007	Scheme development	The Environment Agency is in agreement that the pipeline route will avoid conflict with the planned Hermitage Stream catchment enhancement measures that Portsmouth Water has agreed to implement under Regulation 19 of the Water Environment Regulations.	The pipeline will not conflict or interact with the planned Hermitage Stream, catchment enhancement measures that Portsmouth Water has agreed to implement under Regulation 19 of the Water Environment Regulations.		Matter agreed with other party
EA-SCO-016	Scheme development	The Environment Agency objected to the selection of a construction compound to the west of Highbridge Road owing to the presence of peat and its suitability for reptiles and other species. The Environment Agency approved the change to a site to the east of Highbridge Road.	The Applicant took the Environment Agency's objection on board and did not progress the initial site for the eastern River Itchen trenchless crossing construction compound (to the west of Highbridge Road) in order to avoid potential environmental impacts. An alternative compound to the east of Highbridge Road has been identified and progressed with the approval of the Environment Agency.		Matter agreed with other party
EA-ES-038	Watercourse crossings and methodologies	The Environment Agency requested justification for the use of open cut watercourse crossing of the winterbourne watercourse in the River Meon catchment.	The Applicant has clarified that the potential winterbourne watercourse (former Crossing 10) will be crossed using trenchless construction as part of the wider River Meon crossing. Open-cut construction is proposed for a small ditch which runs through the bottom of the golf course and along the entry driveway and south-western boundary of the Wickham Wastewater Treatment Works. This ditch is a straight man-made drainage channel with uniform sloped sides. The ditch is classified in poor condition, with poor water quality and no aquatic vegetation present on banks or within channel in June 2024. Macroinvertebrate survey, also in 2024, indicated a community of low conservation value and no terrestrial, semi-aquatic or temporary stream specialists identified. Although not classified as a natural winterbourne, the intermittent nature of this watercourse is considered in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) and a pre-construction ecological survey is planned to understand the condition of the watercourse	ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1)	Matter agreed with other party

Row ID	Topic	Summary of Environment Agency issue	Latest Position in Resolving the Issue	Application Document Reference	Status
			before construction, and to reassess if any sensitive species or habitats are present. The Environment Agency has confirmed it is satisfied with the open-cut crossing method for this drainage channel.		
EA-PEI-007	Watercourse crossings and methodologies	The Environment Agency is satisfied with the details presented about watercourse crossings construction methodologies including plans for the River Meon crossing.	The Environment Agency has expressed satisfaction with the watercourse crossings construction approach i.e. which watercourses will be crossed with trenchless construction and which will be open-cut. Watercourse crossing construction methodology information is included in ES Chapter 3 Description of the Proposed Development [APP-082] and Outline Construction Environmental Management Plan - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1).	ES Chapter 3 Description of the Proposed Development [APP-082] Outline Construction Environmental Management Plan - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1)	Matter agreed with other party
Consents and licences					
EA-EPD-011	Consents and licences	Discharge permit applications are determined by the Environment Agency. The discharge permit application is not currently anticipated to be ready for submission until early February 2027 and may take up to a year to be granted, whereas determination of the DCO application decision is anticipated in summer/autumn 2027. The Environment Agency cannot pre-determine discharge permit applications prior to submission. However, as stated at Gate 3 sign off, the Environment Agency is satisfied that, whilst the discharge permit application will be made subsequent to the DCO application, the pre-application work and discussions with the Applicant have not identified any issues that would indicate that a permit for discharge of water from the Water Recycling Plant into Havant Thicket Reservoir cannot be granted.	A new discharge permit is being sought from the Environment Agency for discharge of water from the Water Recycling Plant into Havant Thicket Reservoir. The Applicant is undertaking formal pre-application engagement with the Environment Agency. This engagement is running in parallel to the EIA engagement but has significant overlaps in terms of updates on water quality modelling. The Environment Agency has directed the methodology and sampling regime through the pre-application process. The Environment Agency is satisfied that the application is being developed in accordance with relevant pre-application guidance. The discharge permit application is not currently anticipated to be ready for submission until early February 2027 and may take up to a year to be granted, whereas determination of the DCO application decision is anticipated in summer/autumn 2027. The Environment Agency cannot pre-determine discharge permit applications prior to submission. However, as stated at Gate 3 sign off, the Environment Agency is satisfied that, whilst the discharge permit application will be made subsequent to the DCO application, the pre-application work and discussions with the Applicant have not identified any issues that would indicate that a permit for discharge of water from the Water Recycling Plant into Havant Thicket Reservoir cannot be granted.		Matter agreed with other party

Row ID	Topic	Summary of Environment Agency issue	Latest Position in Resolving the Issue	Application Document Reference	Status
EA-ES-025	Consents and licences	The Environment Agency is willing to agree that the FRAP requirement for five of the main river crossings can be disapplied and included in the DCO if its standard protective provisions are accepted and included in the DCO. The other seven main river crossings could fall under the exemption FRA3 and the Environment Agency has provided the set of conditions that these would have to comply with in order to be exempt.	The Applicant will formally seek the Environment Agency's consent to the DCO disapplying the FRAP requirement for the five main river crossings where the Environment Agency has indicated it is willing to give that consent. The Applicant has proposed several changes to the Environment Agency's standard protective provisions for DCOs and has provided justifications for each. The Applicant will engage with the Environment Agency with the aim of reaching agreement on these changes. The Environment Agency's current position is that no changes to the protective provisions will be accepted and that the Applicant will need to apply for FRAPs if the un-changed protective provisions are not included in the DCO. The Applicant intends to apply for FRAP exemption for the other seven main river crossings.		Matters subject to further discussion
EA-ES-045	Consents and licences	The Environment Agency has confirmed via pre-application advice that, as drilling into the waste on the Water Recycling Plant (WRP) site is not a permitted activity, and there is no plan to re-deposit any landfill waste (or the above soils) on site, construction of the WRP does not require a permit.	The Applicant sought pre-application advice from the Environment Agency to determine if an environmental permit is required for the drilling/excavating activity into the historic landfill and removing the hazardous material/waste to level the land at the Water Recycling Plant site. The Environment Agency has confirmed via pre-application advice that, as drilling into the waste on the Water Recycling Plant (WRP) site is not a permitted activity, and there is no plan to re-deposit any landfill waste (or the above soils) on site, construction of the WRP does not require a permit.		Matter agreed with other party
EA-ES-074	Consents and licences	Abstraction licence applications are determined by the Environment Agency. The Environment Agency cannot pre-determine abstraction licence applications prior to submission. However, as stated at Gate 3 sign off, the Environment Agency is satisfied that, whilst the abstraction licence application will be made subsequent to the DCO application, pre-application discussions with the Applicant have not identified any issues that would indicate that a licence would not be forthcoming.	An abstraction licence will be required for the Applicant to abstract water from Havant Thicket Reservoir prior to transfer to Otterbourne Water Supply Works. The approach to obtaining this licence, and related programme is under discussion with the Environment Agency. The Environment Agency cannot pre-determine abstraction licence applications prior to submission. However, as stated at Gate 3 sign off, the Environment Agency is satisfied that, whilst the abstraction licence application will be made subsequent to the DCO application, pre-application discussions with the Applicant have not identified any issues that would indicate that a licence would not be forthcoming.		Matter agreed with other party

Row ID	Topic	Summary of Environment Agency issue	Latest Position in Resolving the Issue	Application Document Reference	Status
EA-EX-001	Consents and licences	The Environment Agency has significant concerns regarding the provisions included in article 5 and Schedule 8 to the draft Development Consent Order [APP-023]. The Environment Agency considers that the existing abstraction licensing and environmental permitting regimes are well established and contain sufficient flexibility to accommodate major water infrastructure schemes. The Environment Agency is concerned that the proposed provisions would, amongst other things, require the development and implementation of bespoke operational processes, placing an unnecessary additional burden on the Environment Agency and its resources, restrict the Environment Agency's regulatory powers, and impede its ability to discharge its statutory functions. The Environment Agency therefore considers that the proposed modifications are neither necessary nor justified. Since the DCO application was made, the Environment Agency has met with the Applicant to discuss its concerns regarding these provisions. Notwithstanding that engagement, the Environment Agency remains unpersuaded that the proposed modifications are necessary or justified. On 15 October 2026, the Environment Agency provided its detailed comments on these provisions to the Applicant. The Applicant provided its response on 19 November 2026, which the Environment Agency is now considering. The Environment Agency will continue to engage with the Applicant on this matter	An abstraction licence will be required for the Applicant to abstract water from Havant Thicket Reservoir prior to transfer to Otterbourne Water Supply Works. The reservoir will be owned and operated by Portsmouth Water but is being funded by the Applicant and its customers. The Applicant needs to ensure that it has the legal right to use the water in the reservoir and a coordinated, unified operating and regulatory regime across the combined Havant Thicket Reservoir and Hampshire Water Transfer and Water Recycling Project system is required. The Applicant has proposed to achieve this via the inclusion of Article 5 and Schedule 8 to the Draft Development Consent Order [APP-023]. Article 5 provides statutory authority for the Applicant to use and enjoy the Havant Thicket Reservoir infrastructure for the purposes of the Hampshire Water Transfer and Water Recycling Project. Schedule 8 has six parts: Parts 1–4 modify regulatory regimes applicable to the Havant Thicket Reservoir infrastructure and the Project (including the Water Resources Act 1991); Part 5 sets out what the abstraction licences must contain; and Part 6 provides enforcement rules for licence breaches. The Applicant has provided the Environment Agency with clear rationale for the inclusion of Article 5 and Schedule 8. The Applicant is continuing to engage with the Environment Agency in relation to the inclusion of Article 5 and Schedule 8 on the basis that the Applicant considers they provide the only integrated, legally certain solution and that this is necessary for the DCO to be successful. The Environment Agency is taking legal advice and will continue to engage with the Applicant on this matter.	Draft Development Consent Order [APP-023]	Matters subject to further discussion
EA-ES-075	Consents and licences	Discharge permit applications are determined by the Environment Agency. The discharge permit application is not currently anticipated to be ready for submission until early February 2027 and may take up to a year to be granted, whereas determination of the DCO application decision is anticipated in summer/autumn 2027. The Environment Agency cannot pre-determine discharge permit applications prior to submission. However, as stated at Gate 3 sign off, the Environment Agency is satisfied that, whilst the	A variation to the existing discharge permit for the Eastney Long Sea Outfall is required to take account of the reject stream from the Water Recycling Plant. This is being sought via the same permit application as for the new discharge to Havant Thicket Reservoir. The Applicant is undertaking formal pre-application engagement with the Environment Agency – this is the same pre-application covered in EA-EPD-011. This engagement is running in		Matter agreed with other party

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		discharge permit application will be made subsequent to the DCO application, the pre-application work and discussions with the Applicant have not identified any issues that would indicate that a permit for discharge of the reject stream from the Water Recycling Plant via the Eastney Long Sea Outfall cannot be granted.	parallel to the EIA engagement but has significant overlaps in terms of updates on water quality modelling. The Environment Agency has directed the methodology and sampling regime through the pre-application process. The Environment Agency is satisfied that the application is being developed in accordance with relevant pre-application guidance. The discharge permit application is not currently anticipated to be ready for submission until early February 2027 and may take up to a year to be granted, whereas determination of the DCO application decision is anticipated in summer/autumn 2027. The Environment Agency cannot pre-determine discharge permit applications prior to submission. However, as stated at Gateway 3 sign off, the Environment Agency is satisfied that, whilst the discharge permit application will be made subsequent to the DCO application, the pre-application work and discussions with the Applicant have not identified any issues that would indicate that a permit for discharge of the reject stream from the Water Recycling Plant via the Eastney Long Sea Outfall cannot be granted.		
EA-PEI-009	Consents and licences	Environment Agency consents should be obtained outside of the DCO under normal consenting procedures.	The Applicant is not seeking to disapply the requirement for Environment Agency consents other than for some Flood Risk Activity Permits - refer to EA-ES-025.		Matter agreed with other party
EA-ES-003	Terrestrial and freshwater biodiversity - licencing	Any fish rescue and relocation will be subject to equipment and fish movement permits/authorisations from the Environment Agency.	Measure TFB14 of the Outline Construction Environmental Management Plan - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1), details that where open-cut construction over smaller watercourses, ditches and agricultural drains is required, this construction will be preceded by a survey to assess the suitability of these watercourses to be used by fish. Where there is potential of fish presence, the appropriate permits and authorisations will be obtained from the Environment Agency (or otherwise) and works will only proceed under a method statement for the species present (including fish rescue where necessary).	Outline Construction Environmental Management Plan - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1)	Matter agreed with other party
Habitats and ecology					
EA-ES-058	Terrestrial and freshwater biodiversity - scope	The Environment Agency is in agreement that the scope of the terrestrial and freshwater biodiversity assessment is appropriate.	The Environment Agency has been engaged throughout the stages of the EIA via EIA Working Group and Technical Working Group sessions. Its comments on the terrestrial and freshwater biodiversity assessment scope, including	ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1)	Matter agreed with other party

Row ID	Topic	Summary of Environment Agency issue	Latest Position in Resolving the Issue	Application Document Reference	Status
			receptors, categories of effect and pathways of effect, have been sought and incorporated. The Environment Agency is in agreement that the scope of the terrestrial and freshwater biodiversity assessment, as reported in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1), is appropriate.		
EA-ES-017	Terrestrial and freshwater biodiversity - baseline	The Environment Agency is satisfied that the planned river restoration works associated with Portsmouth Water's Havant Thicket Reservoir Project have been appropriately considered in the baseline of the Terrestrial and freshwater biodiversity assessment.	During the October 2025 Technical Working Group, the Applicant presented the enhancement measures proposed by Portsmouth Water and described how these are covered in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1). The Environment Agency noted that there is a condition in Portsmouth Water's Impoundment Licence to provide/improve eel and fish passage below New Road, which was not in the October 2025 Technical Working Group slides. The Applicant acknowledged this condition. During the February 2026 Technical Working Group, the Applicant confirmed that Portsmouth Water has been consulted on its planned approach to addressing the eel and fish passage-related conditions in the Havant Thicket Reservoir impoundment licence. Portsmouth Water's designs were not finalised in time for inclusion in the future baseline of the terrestrial and freshwater biodiversity assessment. The Applicant has therefore made the assumption in the future baseline that the Hermitage and Riders Lane Streams (between Havant Thicket Reservoir and Langstone Harbour) will be accessible to migratory fish and eels. As it is not considered that there will be any adverse effects on either watercourse from the Project, the potential presence of migratory fish and eels does not affect the assessment outcome and there will be no adverse significant residual effects. This is included in 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
EA-ES-061	Terrestrial and freshwater biodiversity - baseline	The Environment Agency is in agreement that the baseline of the terrestrial and freshwater biodiversity assessment is appropriate.	The Environment Agency has been engaged throughout the stages of the EIA via EIA Working Group and Technical Working Group sessions. Its comments on the terrestrial and freshwater biodiversity assessment baseline, including data sources and coverage, have been sought and incorporated. The Environment Agency is in agreement that the baseline of the terrestrial and freshwater biodiversity assessment, as set out in	ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1)	Matter agreed with other party

Row ID	Topic	Summary of Environment Agency issue	Latest Position in Resolving the Issue	Application Document Reference	Status
			ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1), is appropriate.		
EA-ES-011	Terrestrial and freshwater biodiversity - methodology	The Environment Agency is satisfied with the clarity of the approach to assessment of potential impacts on ephemeral invertebrates provided by the Applicant.	Macroinvertebrate survey results have been presented to the Environment Agency and are included in the assessments of potential impacts in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1), especially regarding species of conservation concern in semi-aquatic or terrestrial habitats. The Environment Agency is satisfied with the clarity of the approach to assessment of potential impacts on ephemeral invertebrates provided by the Applicant.	ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1)	Matter agreed with other party
EA-ES-066	Terrestrial and freshwater biodiversity - methodology	The Environment Agency is in agreement that the methodology of the terrestrial and freshwater biodiversity assessment is appropriate.	The Environment Agency has been engaged throughout the stages of the EIA via EIA Working Group and Technical Working Group sessions. Its comments on the terrestrial and freshwater biodiversity assessment methodology have been sought and incorporated in 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
EA-ES-047	Terrestrial and freshwater biodiversity - surveys	The Environment Agency is in agreement that the ecology survey methodologies, extents and assumptions are appropriate.	Ecology survey coverage has been presented, discussed and approved by the Environment Agency. The Environment Agency approve the precautionary approach taken for both habitats and species where assumptions have been made. Surveys were conducted between 2023 and 2025. The Applicant considers that all surveys remain valid for the assessment provided in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1), particularly given that there will be an extensive pre-construction survey programme, detailed in measure TFB5 of, and secured through, the Outline Construction Environmental Management Plan - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1), to ensure the ecology baseline is updated. This approach has been presented to the Environment Agency and the Environment Agency has expressed satisfaction. The extensive pre-construction survey programme will include surveys to assess the suitability for fish of smaller watercourses, ditches and agricultural drains where open-cut construction is required. Where there is potential for fish presence, the appropriate permits and	Outline Construction Environmental Management Plan - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1) ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1)	Matter agreed with other party

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			authorisations will be obtained from the Environment Agency (or otherwise) and works will only proceed under a method statement for the species present (including fish rescue where necessary) This is secured in TFB14 of Outline Construction Environmental Management Plan - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1). Beavers were scoped out in the Scoping Opinion with the Environment Agency's agreement. However, given the species' ongoing range expansion there is a possibility that they might become present in the study area. Pre-construction surveys will detect any presence. The Environment Agency has expressed satisfaction with this approach.		
EA-ES-015	Terrestrial and freshwater biodiversity - assessment	The Environment Agency noted that disturbing a natal otter holt would be a significant effect. The Environment Agency is in agreement with the finding that mitigation would reduce effects on natal holts to non-significant, were any discovered.	ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) presents an assessment of impacts on otters, including on otter natal holts. The Applicant agrees that disturbing a natal holt would be a significant effect. No natal holts have been recorded and therefore no specific primary mitigation measure to avoid existing natal holts has been required. The primary mitigation measures embedded in the design of the Project, such as the locations of trenchless crossing compounds, are related to minimising direct impacts on supporting habitats. Secondary mitigation relating to otters is set out in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) including that if a natal site is confirmed or suspected to support otter cubs, the buffer will be extended to 200m of the natal site, with works within this buffer being suspended for approximately eight to ten weeks until it has been confirmed the cubs are mobile, or presence of cubs is ruled out. This is secured in the Outline Construction Environmental Management Plan - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1). Primary and secondary mitigation reduces potential effects on natal holts to non-significant. The Environment Agency agrees with this assessment, having reviewed ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) and the	ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) Outline Construction Environmental Management Plan - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1)	Matter agreed with other party

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			Outline Construction Environmental Management Plan - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1).		
EA-ES-022	Terrestrial and freshwater biodiversity - assessment	The Environment Agency is satisfied that anticipated impacts on ecological receptors from changes to water quality have been appropriately assessed in the Environmental Statement.	Model outputs of the effects of the introduction of recycled water, taking into account the incorporation of additional phosphorus removal measures in the Water Recycling Plant, are presented in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) and ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1). The Environment Agency is satisfied with the assessment provided.	ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1)	Matter agreed with other party
EA-ES-069	Terrestrial and freshwater biodiversity - assessment	The Environment Agency is in agreement that the terrestrial and freshwater biodiversity assessment findings and mitigation proposals are appropriate, having reviewed ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) in full.	The Environment Agency has been engaged throughout the stages of the EIA via EIA Working Group and Technical Working Group sessions. The 'no surprises' approach to engagement on all aspects of the terrestrial and freshwater biodiversity assessment has enabled the Applicant to have confidence in the Environment Agency's support of the findings of the assessment regarding effects and appropriate mitigation. The Environment Agency is in agreement that the terrestrial and freshwater biodiversity assessment findings and mitigation proposals are appropriate, having reviewed ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) in full.	ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1)	Matter agreed with other party
EA-ES-010	Terrestrial and freshwater biodiversity - mitigation	The Environment Agency is satisfied that ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) makes it clear that, if mitigation for water vole required displacement, there must be suitable habitat to displace into.	Details on water vole displacement have been included in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) as follows: displacement would be permitted to affect no more than a 50m of continuous bank top on one side of a bank and must provide at least 50m undisturbed bank top between locations to be subject to displacement, should multiple locations be required on the same watercourse. Displacement will only be undertaken if sufficient habitat remains to support the water vole population. Measure TFB28 of the Outline Construction Environmental Management Plan - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1) addresses water vole displacement.	ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) Outline Construction Environmental Management Plan - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1)	Matter agreed with other party

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			The Environment Agency is satisfied with this content.		
EA-ES-049	Underwater noise and vibration	The Environment Agency is satisfied that potential impacts on fish from underwater noise and vibration have been appropriately assessed and are satisfied that risks from underwater noise and vibration will be mitigated.	The Applicant has presented evidence to support its position that underwater noise and vibration will not impact lamprey, salmonids, or salmonid eggs. The Applicant has confirmed a scheme-wide commitment to a 2.5m minimum depth for trenchless crossings. However, the indicative design has the following minimum depths: • River Itchen = 10m • River Meon = 4.5m • River Hamble = 4.5m The Applicant has committed to these minimum depths in design principle PL_13 of Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1). The Environment Agency is satisfied that risks from underwater noise and vibration will be mitigated.	Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1)	Matter agreed with other party
EA-ES-052	Invasive Non-Native Species Biosecurity Plan	The Environment Agency's feedback on the draft Invasive Non-Native Species Biosecurity Plan has been provided. The Environment Agency is satisfied with the Applicant's proposed approach to INNS control.	The Environment Agency's feedback on the draft Invasive Non Native Species INNS Biosecurity Plan [APP-425] was generally supportive and its comments have been incorporated. The Applicant has continued to engage on the Invasive Non-Native Species topic in Technical Working Groups. The Environment Agency raised concerns about overflows at Chickenhall WTW. At the October 2025 Technical Working Group, the Applicant explained that the management of INNS is being concentrated at Otterbourne WSW and outlined proposed treatment measures. Further information was provided at the December 2025 Technical Working Group about the proposed INNS treatment at Otterbourne WSW, and the provision of space for any future legislative requirement for INNS pathogen treatment. It was confirmed that there will be no INNS pathway to Chickenhall WTW because any INNS will be contained and treated at Otterbourne WSW. The Environment Agency has expressed its agreement with the approach presented, subject to the agreement of Natural England's INNS specialist (which has been confirmed - see Natural England's SoCG).	Invasive Non Native Species INNS Biosecurity Plan [APP-425]	Matter agreed with other party

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			The Applicant provided an update at the February 2026 Technical Working Group about INNS treatment at Otterbourne WSW now being incorporated as part of the Project.		
EA-ES-039	Habitats Regulations Assessment / Marine Conservation Zone Assessment	The Environment Agency has provided feedback on the Stage 2 Habitat Regulations Assessment/Marine Conservation Zone Stage 1 Assessment and is in agreement with the scope and findings of the assessments.	The Environment Agency has confirmed satisfaction with the Habitat Regulations Assessment/Marine Conservation Zone Assessment reporting and its comments have been incorporated into Habitats Regulations Assessment – Stage 2 Appropriate Assessment and Marine Conservation Zone – Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2) included in the DCO application.	Habitats Regulations Assessment – Stage 2 Appropriate Assessment and Marine Conservation Zone – Stage 1 Assessment (Document reference 5.2, DCO Volume 5, Version 2)	Matter agreed with other party
Marine environment					
EA-SCO-008	Marine biodiversity - methodology	The Environment Agency is satisfied that the Applicant has justified the decisions behind the modelled parameters in the Long Sea Outfall dispersion modelling.	The original parameters that were modelled were based on currently consented parameters from the Budd's Farm permit. The Applicant has worked through a screening assessment for chemicals, in line with Environment Agency guidance. Outcomes of this assessment are presented in ES Appendix 19.5 Eastney Long Sea Outfall Solent dispersion modelling, Volume II (Document reference ES Appendix 19.8 ES Appendix 19.8 Hampshire Water Transfer and Water Recycling Project Eastney Long Sea Outfall - CORMIX Modelling for Chemicals Screened in via the Surface Water Risk Assessment Process [APP-203]. The Environment Agency is satisfied that the Applicant has justified the decisions behind the modelled parameters in the Long Sea Outfall dispersion modelling.	ES Appendix 19.5 Eastney Long Sea Outfall Solent dispersion modelling [APP-200] ES Appendix 19.8 ES Appendix 19.8 Hampshire Water Transfer and Water Recycling Project Eastney Long Sea Outfall - CORMIX Modelling for Chemicals Screened in via the Surface Water Risk Assessment Process [APP-203]	Matter agreed with other party
EA-EPD-010	Marine biodiversity - surveys	The Environment Agency is in agreement that the marine biodiversity survey methodologies, extents and assumptions are appropriate.	Marine biodiversity survey methodologies, extents, assumptions and limitations have been consulted on via EIA Working Group and Technical Working Group sessions and the Environment Agency has raised no concerns in these forums or via its Summer 2024 Consultation response. The Environment Agency is in agreement that the marine biodiversity survey methodologies, extents and assumptions are appropriate.		Matter agreed with other party
EA-ES-064	Marine biodiversity - assessment	The Environment Agency is in agreement that the scope, baseline and methodology of the marine biodiversity assessment are appropriate.	The Environment Agency has been engaged throughout the stages of the EIA via EIA Working Group and Technical Working Group sessions. Its comments on the scope, baseline and methodology of the marine biodiversity assessment, have been sought and incorporated. The Environment Agency is in agreement that the		Matter agreed with other party

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			scope, baseline and methodology of the marine biodiversity assessment are appropriate.		
EA-ES-056	Marine biodiversity - assessment	The Environment Agency believe there is potential risk posed by the Water Recycling Plant Sustainable Drainage Systems Hermitage Stream outfall to eels and requested mitigation within the design. The Applicant has agreed a design principle with the Environment Agency to deter eels from passing through the pipe. The Environment Agency is satisfied subject to future engagement on the outfall design at the detailed design stage, which is secured by DCO requirement (Schedule 2, requirement 15).	In the October 2025 Technical Working Group, the Applicant outlined its position that negligible impact to eels is expected and noted that there is no legal requirement for an eel screen on an outfall. The Environment Agency agreed that there is no legal requirement for an eel screen but requested further evidence to support the Applicant's expectation of negligible risk to eels. At the November 2025 Technical Working Group, the Applicant presented further information to support its position. The Environment Agency maintained its concern that eels could be drawn to the pipe and potentially be at risk of harm but outlined two potential solutions that would mitigate the risk to eels: 1) a wet environment (pond) at the upstream end of the pipe where eels would emerge and/or 2) a vertical step within the pipe near the outfall which would make it very difficult for eels to pass and traverse the pipeline. The Applicant noted that if the basin were to have a pond, it would need to be aerated to stop the basin becoming stagnant during prolonged dry periods and there would likely be issues that arise in terms of aeration and maintenance. However, the Applicant explained that the inclusion of a vertical step in the pipeline would be a workable solution. The Applicant has therefore included the following measure in Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1): "To deter the passage of eels, a step will be placed within the SuDS outfall pipe. The step will be a minimum of 0.3m in height and have an overhang/lip". This wording is agreed with the Environment Agency. The Environment Agency is satisfied subject to future engagement on the outfall design at the detailed design stage, which is secured by DCO requirement (Schedule 2, requirement 15) of Draft Development Consent Order [APP-023].	Draft Development Consent Order [APP-023] Design Principles Document (Document reference 5.11, DCO Volume 5, Version 1)	Matter agreed with other party
EA-ES-065	Marine biodiversity - assessment	The Environment Agency is in agreement that the marine biodiversity assessment findings and mitigation proposals are appropriate having reviewed these in full in ES Chapter 9 Marine biodiversity (Document reference 6.1, DCO Volume 6, Version 1).	The Environment Agency has been engaged throughout the stages of the EIA via EIA Working Group and Technical Working Group sessions. The 'no surprises' approach to engagement on all aspects of the marine biodiversity assessment has enabled the Applicant to have confidence in the Environment Agency's support of the findings	ES Chapter 9 Marine biodiversity (Document reference 6.1, DCO Volume 6, Version 1)	Matter agreed with other party

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			of the assessment regarding effects and appropriate mitigation.		
Biodiversity and nature conservation					
EA-ES-040	Biodiversity Net Gain / Environmental Net Gain	The Environment Agency expects firm Biodiversity Net Gain (BNG) commitments to be made.	The Applicant is committed to achieving at least 10% BNG, consistent with the Defra consultation and stakeholder expectations. The Environment Agency has confirmed that it is satisfied with the approach.	Biodiversity Gain Plan [APP-426] Draft Development Consent Order [APP-023]	Matter agreed with other party
EA-ES-055	Biodiversity Net Gain / Environmental Net Gain	The Environment Agency's support of the Applicant's approach to Environmental Net Gain has been sought. The Environment Agency has confirmed that it agrees with the overall approach.	The Applicant has presented the approach to Environmental Net Gain, and this has been supported by the Environment Agency. This is set out in the Environmental Net Gain Statement [APP-427] with further explanation of how benefits will be secured provided in Table 4-1 of Case for the Project (Document reference 5.6, DCO Volume 5, Version 1).	Case for the Project (Document reference 5.6, DCO Volume 5, Version 1) Environmental Net Gain Statement [APP-427]	Matter agreed with other party
Contamination and land quality					
EA-ES-060	Land quality and ground conditions - scope	The Environment Agency is in agreement that the scope of the land quality and ground conditions assessment is appropriate.	The Environment Agency has been engaged throughout the stages of the EIA via EIA Working Group and Technical Working Group sessions. Its comments on the land quality and ground conditions assessment scope, including receptors, categories of effect and pathways of effect, have been sought and incorporated. The Environment Agency is in agreement that the scope of the land quality and ground conditions assessment is appropriate.	ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1)	Matter agreed with other party
EA-ES-063	Land quality and ground conditions - baseline	The Environment Agency is in agreement that the baseline of the land quality and ground conditions assessment is appropriate.	The Environment Agency has been engaged throughout the stages of the EIA via EIA Working Group and Technical Working Group sessions. Its comments on the land quality and ground conditions assessment baseline, including data sources and coverage, have been sought and incorporated. The Environment Agency is in agreement that the baseline of the land quality and ground conditions assessment is appropriate.	ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1)	Matter agreed with other party
EA-ES-032	Land quality and ground conditions - baseline	The Environment Agency is satisfied with the consideration of nitrates (from ammoniacal nitrogen transformation) in ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1).	ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1) identifies the potential for ammonium (NH_4^+) within the landfill leachate to be undergoing oxidation to nitrite (NO_2^-) and subsequently to nitrate (NO_3^-). This would result in an increased nitrate concentration within the landfill leachate and a reduction in ammonium concentrations. This transformation occurs within the landfill leachate when oxygen is introduced. ES Appendix 19.9 Outline Water Monitoring Plan [APP-204] includes a water quality sampling suite covering ammoniacal nitrogen, ammonia, nitrate	ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1) ES Appendix 19.9 Outline Water Monitoring Plan [APP-204]	Matter agreed with other party

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			and nitrite for the construction phase of the Project. This includes pre-construction baseline monitoring and post-construction monitoring. This will allow any changes in these determinands to be identified and allow appropriate action plans to be implemented if required. During the operational phase of the Project, leachate generation is expected to diminish, as surface infiltration will be significantly reduced by the introduction of hardstanding at the Water Recycling Plant (WRP). Consequently, both ammonium concentrations and the potential for nitrate formation are anticipated to decline, representing an environmental improvement. Overall, the risk of increased nitrate generation during the operation of the WRP site is considered to be minimal. The Environment Agency has expressed reviewed ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1) and 6 ES Appendix 19.9 Outline Water Monitoring Plan [APP-204] and is in agreement.		
EA-ES-041	Land quality and ground conditions - baseline	The Environment Agency is satisfied that potential per- and polyfluoroalkyl substances (PFAS) contamination risk from fire water runoff incidents in the study area has been appropriately assessed. The Environment Agency is satisfied that no evidence has emerged to suggest that pollution incidents involving firefighting run-off, potentially contaminated by PFAS, have impacted the Water Recycling Plant (WRP) site or the pipeline route. The Environment Agency requested that the possibility of PFAS in the landfill beneath the WRP be considered but acknowledge that this is unlikely to be a significant issue given the age of the waste in the landfill. The Environment Agency is satisfied that PFAS is included in the indicative water quality monitoring suite outlined in ES Appendix 19.9 Outline Water Monitoring Plan [APP-204] and that the final sampling suite and limits of detection will be agreed with the Environment Agency.	In relation to the possibility of PFAS in the landfill beneath the WRP site, it is identified as a potential contaminant of concern in ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1). The chapter includes a tertiary mitigation measure of further ground investigation at detailed design stage if required. The Environment Agency is in agreement with the findings of ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1) and the content of ES Appendix 19.9 Outline Water Monitoring Plan [APP-204].	ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1) ES Appendix 19.9 Outline Water Monitoring Plan [APP-204]	Matter agreed with other party
EA-ES-068	Land quality and ground conditions - methodology	The Environment Agency is in agreement that the methodology of the land quality and ground conditions assessment is appropriate.	The Environment Agency has been engaged throughout the stages of the EIA via EIA Working Group and Technical Working Group sessions. Its comments on the land quality and ground conditions assessment methodology have been sought and incorporated. The Environment Agency is in agreement that the methodology of		Matter agreed with other party

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			the land quality and ground conditions assessment is appropriate.		
EA-ES-004	Land quality and ground conditions - assessment	The Environment Agency advised that characterisation of impacts of up to 6 years as "short term", in the context of new impacts to strategically important public water supplies, is inappropriate and would not result in appropriate final risk ratings for impacts to water supplies. The Environment Agency is satisfied that the Applicant has taken this advice on board.	The Applicant agrees that what would be considered 'short term' during construction could lead to long term impacts on strategically important public water supplies with respect to contamination ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1) now considers the potential impacts to Principal Aquifers to have a high magnitude of impact prior to mitigation due to the potential for large scale, long-term impacts on groundwater quality. However, with the implementation of both primary and tertiary mitigation, the magnitude of impact is reduced to negligible. The Environment Agency is satisfied, having reviewed ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1).	ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1)	Matter agreed with other party
EA-ES-005	Land quality and ground conditions - assessment	The Environment Agency is in agreement that assessment of direct impacts of contamination on groundwater quality and groundwater resources, and on surface water quality and the habitats supported, has been appropriate.	This assessment is reported in ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1), including primary mitigation. The chapter assessment also considers tertiary mitigation measures protective of groundwater resources. These measures are secured in Outline Construction Environmental Management Plan - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1) (which includes a requirement (WE7) for the Contractor to undertake a Foundation Works Risk Assessment, which will include a detailed Piling Risk Assessment). The detailed Construction Environmental Mitigation Plan(s) will be produced and submitted for approval in accordance with the corresponding requirement in Schedule 2 to the Draft Development Consent Order [APP-023]. ES Appendix 19.9 Outline Water Monitoring Plan [APP-204] is also relevant because it includes plans to monitor groundwater during dewatering, as well as plans to monitor surface runoff. The Environment Agency has confirmed satisfaction with the assessment and mitigation, having reviewed the relevant DCO documentation referenced above.	Draft Development Consent Order [APP-023] ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1) ES Appendix 19.9 Outline Water Monitoring Plan [APP-204] Outline Construction Environmental Management Plan - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1)	Matter agreed with other party
EA-ES-034	Land quality and ground conditions - assessment	The Environment Agency is satisfied that appropriate distinctions between Source Protection Zones 1 to 3 have been made in ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1).	ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1) distinguishes between Source Protection Zones (SPZ) 1 to 3. The automatic SPZ 1 has been applied around private	ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1)	Matter agreed with other party

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			potable abstractions. Further detail is provided in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) and ES Appendix 19.3 Hydrogeological Impact Assessment [APP-198] which outline all the SPZs within the study area, differentiating between SPZ1, 2, 3 and 1C etc where relevant. The Environment Agency has expressed satisfaction, having reviewed ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1) and 6 ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1).	ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) ES Appendix 19.3 Hydrogeological Impact Assessment [APP-198]	
EA-ES-071	Land quality and ground conditions - assessment	The Environment Agency is in agreement that the land quality and ground conditions assessment findings and mitigation proposals are appropriate, having reviewed ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1) in full.	The Environment Agency has been engaged throughout the stages of the EIA via EIA Working Group and Technical Working Group sessions. The 'no surprises' approach to engagement on all aspects of the land quality and ground conditions assessment has enabled the Applicant to have confidence in the Environment Agency's support of the findings of the assessment regarding effects and appropriate mitigation. The Environment Agency is in agreement that the land quality and ground conditions assessment findings and mitigation proposals are appropriate, having reviewed ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1) in full.	ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1)	Matter agreed with other party
EA-SCO-014	Site 72 land contamination	The Environment Agency is satisfied that suitable construction methods and mitigation are proposed for the Site 72 historic landfill (Water Recycling Plant site), to minimise as far as possible the risk of causing increased contamination from leachate. The Environment Agency has been reassured of the fundamental validity of the construction methods as well as by previous instances where these methods have worked on contaminated sites without any apparent significant issues.	The Applicant has outlined construction methods for the Water Recycling Plant site on the historic landfill (known as Site 72), including minimal disturbance of the capping material, use of piled foundations into chalk, and diaphragm-wall shafts designed to prevent preferential pathways for leachate or gas. No increase in leachate generation or offsite migration is anticipated, with a reduction expected due to reduced infiltration. The trenchless crossing beneath the Hermitage Stream and associated works would also not create new migration pathways. The Applicant has supported its case for the construction methods being appropriate by providing examples of other projects involving development through landfills, to help provide reassurance that this is manageable. Void-treatment (measure WE3) and multiple groundwater protection measures are secured	Draft Development Consent Order [APP-023] ES Appendix 19.9 Outline Water Monitoring Plan [APP-204] Outline Construction Environmental Management Plan - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1) Outline Foundation Works Risk Assessment [APP-417] - [APP-419]	Matter agreed with other party

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			through Outline Construction Environmental Management Plan - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1). Detailed Construction Environmental Management Plan(s) will be produced and submitted for approval in accordance with the corresponding requirement in Schedule 2 to the Draft Development Consent Order [APP-023]. Further detail is provided in Outline Foundation Works Risk Assessment [APP-417] - [APP-419], and surface and groundwater monitoring is secured through ES Appendix 19.9 Outline Water Monitoring Plan [APP-204]. Relevant extracts from 6 ES Appendix 19.9 Outline Water Monitoring Plan [APP-204] have been shared and the Environment Agency has confirmed that the Plan has an acceptable level of information for the outline design stage. Overall the Environment Agency has expressed satisfaction that the construction methods for the Water Recycling Plant site on the historic landfill (Site 72) are appropriate after reviewing relevant information shared by the Applicant.		
EA-ES-043	Site 72 land contamination	The Environment Agency accepts cast in situ (Continuous Flight Auger piles) as the preferred option to reduce the risk associated with landfill leachate, and to reduce the potential for creating new contamination pathways. The Environment Agency is satisfied with the approach to managing this risk.	Outline Construction Environmental Management Plan - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1) includes measure WE7 to manage any risks to potable water supplies as a result of piling activities. Further detail is provided in Outline Foundation Works Risk Assessment [APP-417] - [APP-419]. The Contractor will undertake a detailed Foundation Works Risk Assessment (FWRA) in line with CL:AIRE's Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention, which will include a detailed Piling Risk Assessment. The Environment Agency has expressed satisfaction, having reviewed the Outline Construction Environmental Management Plan - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1) and Outline Foundation Works Risk Assessment [APP-417] - [APP-419].	Outline Construction Environmental Management Plan - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1) Outline Foundation Works Risk Assessment [APP-417] - [APP-419]	Matter agreed with other party
EA-ES-044	Site 72 land contamination	The Environment Agency is satisfied that the Applicant has addressed its queries about verifying the material along the entire length of the Bedhampton Springs to Havant Thicket Reservoir tunnel, the length of the tunnel section in waste, and the need for assessing contamination levels in	The Project proposes to use the pipelines that have been consented by Portsmouth Water for the transfer of recycled water and source water between Bedhampton Springs and Havant Thicket Reservoir. The Project would connect into the pipelines and other than the connection works, there are no construction works associated	ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1)	Matter agreed with other party

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		waste materials or groundwater/leachate in this location.	with the Project between Bedhampton Springs and Havant Thicket Reservoir. There will be a need for a short section of trenchless construction to be undertaken beneath the A27 and Mill Lane associated with the connection works. Project specific ground investigations, which included the collection of soil and groundwater samples for laboratory analysis, have been undertaken which have identified the ground conditions present both within this section of the Project, and its entire route. Additional detail on this is provided as part of ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1). The Environment Agency has expressed satisfaction, having reviewed ES Chapter 11 Land quality and ground conditions (Document reference 6.1, DCO Volume 6, Version 1).		
Flood risk and water environment					
EA-SCO-017	Scheme development	The Environment Agency is satisfied that there is minimal risk that the pipelines would prevent delivery of existing River Basin Management Plan mitigation measures.	All the Main Rivers would be crossed using trenchless construction methodologies. ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1) has determined that the Project would not adversely affect mitigation measures identified for any water bodies in the RBMP or prevent those that are not already in place being delivered in the future.	ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1)	Matter agreed with other party
EA-ES-059	Water environment - scope	The Environment Agency is in agreement that the scope of the water environment assessment is appropriate.	The Environment Agency has been engaged throughout the stages of the EIA via EIA Working Group and Technical Working Group sessions. Its comments on the water environment assessment scope, including receptors, categories of effect and pathways of effect, have been sought and incorporated.	ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1)	Matter agreed with other party
EA-SCO-007	Water environment - scope	The Environment Agency is satisfied with the decision to scope out operational effects for the direct disturbance of surface and groundwater on the basis that the assessment of construction phase effects includes long-term (i.e. extending into the operational phase) impacts arising from physical interaction of the buried elements of the Project with groundwater. Also on the basis that, once operational, there is no pathway for Project infrastructure to cause surface water disturbance.	The Applicant's position is that it is appropriate to scope out the potential for direct physical disturbance effects on surface and groundwaters from operational infrastructure during the operational phase of the Project. The measures embedded in the design to minimise the effects of operational infrastructure on surface and groundwater receptors are outlined in detail in ES Chapter 3 Description of the Proposed Development [APP-082].	ES Chapter 3 Description of the Proposed Development [APP-082]	Matter agreed with other party

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			The long-term (i.e. extending into the operational phase) impacts arising from physical interaction of the buried elements of the Project with groundwater and surface water have been assessed, but as part of the construction phase impact assessment, rather than the operational phase impact assessment. This includes direct permanent impact on groundwater flows and levels, which may impact groundwater-dependent receptors such as abstractions and groundwater dependent terrestrial ecosystems. Once the scheme is operational, there is no other mechanism for permanent infrastructure to directly disturb groundwater and surface water.		
EA-ES-062	Water environment - baseline	The Environment Agency is in agreement that the baseline of the water environment assessment is appropriate.	The Environment Agency has been engaged throughout the stages of the EIA via EIA Working Group and Technical Working Group sessions. Its comments on the water environment assessment baseline, including data sources and coverage, have been sought and incorporated.		Matter agreed with other party
EA-ES-012	Water environment - baseline	The Environment Agency is satisfied with the reference to the Hermitage catchment future baseline in the water chapter of the Environmental Statement.	The future baseline section of ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) includes a summary of the planned Hermitage Stream catchment enhancement measures that Portsmouth Water has agreed to implement under Regulation 19 of the Water Environment Regulations. This has been presented to the Environment Agency which confirmed the approach seems sensible given the information available and reiterated the importance of the timescales of implementing these enhancement measures. The summarised Portsmouth Water planned enhancements are as follows: • Upper Hermitage Stream at The Queen's Inclosure: Localised tree pollarding/coppicing and installation of leaky woody barriers to improve habitat diversity and slow the flow. • Hermitage Stream from Bushy Lease to New Road: Removal of concrete bed and bank protection, and installation of in-channel berms to increase flow sinuosity. • Headwaters of Riders Lane Stream: Construct a pond area to create additional water habitat and install leaky woody barriers to help slow the flow and create habitat diversity. • Park Lane Stream at Waterlooville Gold Club: Re-naturalise the channel through the removal of bank protection, increasing sinuosity, bank re-profiling and de-culverting.	ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1)	Matter agreed with other party

Row ID	Topic	Summary of Environment Agency issue	Latest Position in Resolving the Issue	Application Document Reference	Status
			• Park Lane Stream in Bell's Copse: Slow the flow by installing leaky woody barriers. It is also noted that a condition of the Havant Thicket Reservoir impoundment licence is to provide/improve eel and fish passage below New Road (designs not finalised at time of DCO submission). The Environment Agency has expressed satisfaction having reviewed ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1).		
EA-ES-067	Water environment - methodology	The Environment Agency is in agreement that the methodology of the water environment assessment is appropriate.	The Environment Agency has been engaged throughout the stages of the EIA via EIA Working Group and Technical Working Group sessions. Its comments on the water environment assessment methodology have been sought and incorporated. The Environment Agency is in agreement that the methodology of the water environment assessment is appropriate.	ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1)	Matter agreed with other party
EA-ES-037	Water environment - methodology	The Environment Agency has been engaged on the methodology and findings of the Water Framework Directive/Water Environment Regulations Compliance Assessment. The Environment Agency has reviewed the full report in the DCO submission and confirmed satisfaction.	ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1) is an appendix to ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1). The Applicant provided an introduction to the Water Environment Regulations Compliance Assessment at the July 2025 Technical Working Group. At the November 2025 Technical Working Group, the Applicant presented the updated findings of the water quality modelling. Results show that releasing water from the Water Recycling Plant would cause only minimal changes to water quality in Havant Thicket Reservoir and would not affect Water Framework Directive status (including for phosphorus). The same applies to the downstream waterbodies (Riders Lane Stream, Hermitage Stream, and Langstone Harbour) that would receive compensatory flows. At the March 2026 Technical Working Group, the Applicant presented an overview of the Water Environment Regulations Compliance Assessment methodology, and the results from the scoping and impact assessment stages. The Environment Agency reviewed ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO	ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1) Outline Construction Environmental Management Plan - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1)	Matter agreed with other party

Row ID	Topic	Summary of Environment Agency issue	Latest Position in Resolving the Issue	Application Document Reference	Status
			Volume 6, Version 1) and returned a set of questions to the Applicant. These included clarifications on the water environment future baseline, Riders Lane Stream WFD status implications, and mitigation measures for turbidity and fine sediment run-off. These questions have been discussed, particularly relevant mitigation measures (WE7, WE11, WE12, WE14 and LQGC8) in the Outline Construction Environmental Management Plan - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1) and answered to the Environment Agency's satisfaction.		
EA-SCO-006	Water environment - methodology	The Environment Agency has been engaged on the water quality modelling approach and findings, and how this has informed the EIA, and is in agreement that the approach is satisfactory, having reviewed the relevant DCO documents in full.	The water quality modelling results are assessed in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1), ES Chapter 9 Marine biodiversity (Document reference 6.1, DCO Volume 6, Version 1) and ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) and 6 ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1). These assessments are supported by full modelling information in ES Appendix 19.5 Eastney Long Sea Outfall Solent dispersion modelling [APP-200], ES Appendix 19.6 Havant Thicket Reservoir Compensatory Flows water quality modelling [APP-201], ES Appendix 19.10 Degradation modelling [APP-205] and ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1) (which was shared with the Environment Agency for review in January 2026).	ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) ES Chapter 9 Marine biodiversity (Document reference 6.1, DCO Volume 6, Version 1) ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1) ES Appendix 19.5 Eastney Long Sea Outfall Solent dispersion modelling [APP-200] ES Appendix 19.6 Havant Thicket Reservoir Compensatory Flows water quality modelling [APP-201] ES Appendix 19.10 Degradation modelling [APP-205] ES Appendix 19.11 Havant Thicket Reservoir water quality modelling	Matter agreed with other party

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				(Document reference 6.2, DCO Volume 6, Version 1)	
EA-ES-057	Water environment - surveys	The Environment Agency is in agreement that the survey methodologies, extents and assumptions are appropriate.	Water environment survey methodologies, extents, assumptions and limitations have been consulted on via EIA Working Group and Technical Working Group sessions and feedback from the Environment Agency has been taken onboard. The Environment Agency is in agreement that the water environment survey methodologies, extents and assumptions are appropriate.	ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1)	Matter agreed with other party
EA-PEI-003	Water environment - assessment	The Environment Agency is satisfied that fine sediment release to watercourses in the event of pipe burst/failure would not be an issue because a build-up of sediment deposits within the pipeline is not anticipated.	A build-up of sediment deposits within the pipeline is not anticipated because the velocity of the water transfer pipeline would be above 0.6 m/s. Sediment release from within the pipeline is therefore not anticipated to be an issue in the event of pipeline bust. The Environment Agency is satisfied with this position.		Matter agreed with other party
EA-ES-070	Water environment - assessment	The Environment Agency is in agreement that the water environment assessment findings and mitigation proposals are appropriate, having reviewed ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) in full.	The Environment Agency has been engaged throughout the stages of the EIA via EIA Working Group and Technical Working Group sessions. The 'no surprises' approach to engagement on all aspects of the water environment assessment has enabled the Applicant to have confidence in the Environment Agency's support of the findings of the assessment regarding effects and appropriate mitigation. The Environment Agency is in provisional agreement that the water environment assessment findings and mitigation proposals are appropriate, subject to reviewing ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) in full.	ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1)	Matter agreed with other party
EA-EPD-009	Water environment - assessment	The Environment Agency is provisionally satisfied that anticipated changes in Havant Thicket Reservoir loading/concentrations associated with the operation of the Water Recycling Plant (WRP) will not cause significant water quality effects. The Environment Agency is satisfied with responses from the Applicant to its comments on the original ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 0) but reserve full agreement until the updated version of Appendix 19.11 is reviewed when submitted during Examination.	The Applicant has carried out sampling and screening to assess concentrations of multiple substances in the final effluent from Budd's Farm WTW, following UK Government guidance and advice from the Environment Agency's National Permitting Team during formal permit pre-application engagement. At the November 2025 Technical Working Group, the Applicant presented updated findings of the water quality modelling. Results show that releasing water from the WRP would cause only minimal changes to water quality in Havant Thicket Reservoir and would not affect Water Framework Directive status. The same applies to the downstream waterbodies (Riders Lane Stream, Hermitage Stream, and Langstone	ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1) ES Chapter 9 Marine biodiversity (Document reference 6.1, DCO Volume 6, Version 1) ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) ES Appendix 19.2 Water Environment Regulations	Provisional agreement pending application evidence

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			Harbour) that would receive compensatory flows. This is reported in ES Chapter 8 Terrestrial and freshwater biodiversity (Document reference 6.1, DCO Volume 6, Version 1), ES Chapter 9 Marine biodiversity (Document reference 6.1, DCO Volume 6, Version 1) and ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) and ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1), supported by full modelling information in 6 ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1) and ES Appendix 19.6 Havant Thicket Reservoir Compensatory Flows water quality modelling [APP-201]. The Environment Agency reviewed a draft of ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 0) in advance of DCO submission and provided comments which have been addressed during the pre-Examination phase. The Environment Agency expressed satisfaction with the Applicant's responses pending sight of the updated Appendix 19.11 which will be published during the Examination phase.	compliance assessment (Document reference 6.2, DCO Volume 6, Version 1) ES Appendix 19.6 Havant Thicket Reservoir Compensatory Flows water quality modelling [APP-201] ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1)	
EA-ES-006	Water environment - assessment	The Environment Agency has been engaged on the chemical parameters that may be discharged from the Eastney Long Sea Outfall above Environmental Quality Standards (EQS). The Environment Agency notes that modelling predicts no significant impacts on marine water quality from the combined Eastney Long Sea Outfall discharge. Chemicals requiring detailed assessment were predicted to comply with Environmental Quality Standards (EQS) close to the outfall, and significant adverse effects from contaminants of emerging concern are considered unlikely.	A screening assessment for chemicals has been completed in line with Environment Agency guidance. Model outputs for the three chemical parameters screened in show that the distance to the Required Dilution Factor (EQS) is within c.1m from the outfall, with small variations in the maximum distance depending upon the WRP flow and operational scenarios: Copper: 0.44m (Annual Average (AA)) Triphenytin: 0.28m (Maximum Acceptable Concentration (MAC)) Diflubenzuron: 1.03m (AA) and 0.17m (MAC) These results are indicative of rapid dilution at the outfall location. The model outputs are presented in ES Appendix 19.8 Hampshire Water Transfer and Water Recycling Project Eastney Long Sea Outfall - CORMIX Modelling for Chemicals Screened in via the Surface Water Risk Assessment Process [APP-203] and the assessment is presented in 6 ES Chapter 19 Water environment (Document reference 6.1,	ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1) ES Appendix 19.8 ES Appendix 19.8 Hampshire Water Transfer and Water Recycling Project Eastney Long Sea Outfall - CORMIX Modelling for Chemicals Screened in via the Surface Water Risk Assessment Process [APP-203]	Matter agreed with other party

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			DCO Volume 6, Version 1) and ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1). Following review of the DCO documentation, the Environment Agency confirmed satisfaction with the results of the assessment in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1), namely the prediction of no significant impacts on marine water quality.		
EA-SCO-013	Water environment - assessment	The Environment Agency agrees that in the operational phase direct disturbance of groundwater is likely to be strategically minimal. The Environment Agency is in agreement that the assessment findings relating to direct disturbance of groundwater in the construction phase are appropriate, having reviewed ES Appendix 19.3 Hydrogeological Impact Assessment [APP-198].	The Applicant has confirmed that the Project will utilise embedded and tertiary measures to mitigate impacts of sub-surface structures on groundwater flow paths (e.g. through drainage design, backfill design etc) and that these measures are outlined in Outline Construction Environmental Management Plan - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1). It is also confirmed that temporary impacts to groundwater flows (e.g. from temporary dewatering of shafts) are assessed in ES Appendix 19.3 Hydrogeological Impact Assessment [APP-198]. The Environment Agency has confirmed approval of the Applicant's approach to groundwater assessment, having reviewed ES Appendix 19.3 Hydrogeological Impact Assessment [APP-198].	ES Appendix 19.3 Hydrogeological Impact Assessment [APP-198] Outline Construction Environmental Management Plan - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1)	Matter agreed with other party
EA-ES-024	Flood Risk Assessment	The Environment Agency confirmed that flood risk mitigation measures presented in the Preliminary Flood Risk Assessment (FRA) at Preliminary Environmental Information Report stage were feasible but needed to be further developed within detailed, site-specific FRAs. The Environment Agency is satisfied with the approach to detailed FRAs, as presented in ES Appendix 19.1 Flood Risk Assessment [APP-189] - [APP-196].	The DCO application includes ES Appendix 19.1 Flood Risk Assessment [APP-189] - [APP-196] that covers the full pipeline route. This includes detailed FRAs for the Water Recycling Plant Site, Budds Farm Waste Water Treatment Works Pumping Station and the following Above Ground Plant: Break Pressure Tank and Intermediate Pumping Station (BPT/IPS)-E, IPS-F, IPS-G, BPT-K. The Environment Agency is satisfied with the approach to detailed FRAs and deferred comments to the Lead Local Flood Authority on surface water issues and/or because the sites are in Flood Zone 1. The detailed, site-specific FRAs are appended to ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) and assess permanent and temporary operational aspects of the Project. Outline Construction Environmental Management Plan - 1 of 3 documents (Document reference 7.1, DCO	ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) ES Appendix 19.1 Flood Risk Assessment [APP-189] - [APP-196] Outline Construction Environmental Management Plan - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1)	Matter agreed with other party

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			Volume 7, Version 1) secures multiple measures to manage construction-related flood risk.		
EA-PEI-006	Flood Risk Assessment	The Environment Agency is satisfied that potential changes to groundwater flood risk have been appropriately assessed and that Outline Construction Environmental Management Plan - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1) mitigation measures are appropriate. The Environment Agency is satisfied that the groundwater flood risk conclusions of the Hydrogeological Impact Assessment have been included in the Flood Risk Assessments (FRAs).	An update on groundwater flood risk assessment (to and from the Project) was presented at the October 2024 Technical Working Group. It was confirmed that the Project will utilise embedded and tertiary measures to mitigate impacts of sub-surface structures on groundwater flow paths (e.g. through drainage design, backfill design etc) and that these measures are secured in Outline Construction Environmental Management Plan - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1). The Environment Agency confirmed that it is satisfied that the impacts relating to groundwater flood risk have been suitably assessed and that 7.1 Outline Construction Environmental Management Plan mitigation measures are appropriate. The overarching ES Appendix 19.1 Flood Risk Assessment [APP-189] - [APP-196] for the Project incorporates a summary of local groundwater flood risk information derived from ES Appendix 19.3 Hydrogeological Impact Assessment [APP-198]. The Environment Agency confirmed that it is satisfied that impacts relating to groundwater flood risk are being suitably assessed and that proposed Outline Construction Environmental Management Plan - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1) mitigation measures look sensible.	ES Appendix 19.1 Flood Risk Assessment [APP-189] - [APP-196] ES Appendix 19.3 Hydrogeological Impact Assessment [APP-198] Outline Construction Environmental Management Plan - 1 of 3 documents (Document reference 7.1, DCO Volume 7, Version 1)	Matter agreed with other party
EA-ES-001	Water environment - mitigation	The Environment Agency has provided comments on the draft ES Appendix 19.9 Outline Water Monitoring Plan [APP-204] (including groundwater monitoring strategy) and is satisfied with the updates made in response.	The Applicant has engaged with the Environment Agency and Portsmouth Water on the groundwater assessment work and incorporated Environment Agency comments into ES Appendix 19.9 Outline Water Monitoring Plan [APP-204] (which is secured by the DCO). This includes comments provided in March 2026 on trigger levels and notification protocols. The Environment Agency has confirmed satisfaction with the amendments made.	ES Appendix 19.9 Outline Water Monitoring Plan [APP-204]	Matter agreed with other party
EA-ES-078	Water environment - mitigation	The Environment Agency is satisfied that the operation of the Water Recycling Plan (WRP) will not cause unacceptable increases in Phosphorus levels in Havant Thicket Reservoir owing to the inclusion of appropriate phosphorus reduction methods in the Project's operation.	The Operation and Maintenance section ES Chapter 3 Description of the Proposed Development [APP-082] provides an overview of the WRP treatment process, including the use of membranes to remove phosphorus. This has been factored into the water quality modelling. The assessment findings indicate that releasing water from the WRP would cause only minimal	ES Chapter 3 Description of the Proposed Development [APP-082] ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1)	Matter agreed with other party

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			changes to water quality in Havant Thicket Reservoir and would not affect Water Framework Directive status for phosphorus. The same applies to the downstream waterbodies (Riders Lane Stream, Hermitage Stream, and Langstone Harbour) that would receive compensatory flows. This is reported in ES Chapter 19 Water environment (Document reference 6.1, DCO Volume 6, Version 1) and ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1), supported by full modelling information in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1) and ES Appendix 19.6 Havant Thicket Reservoir Compensatory Flows water quality modelling [APP-201].	ES Appendix 19.2 Water Environment Regulations compliance assessment (Document reference 6.2, DCO Volume 6, Version 1) ES Appendix 19.6 Havant Thicket Reservoir Compensatory Flows water quality modelling [APP-201] ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.2, DCO Volume 6, Version 1)	

4 Signatories

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

Signed for the EA
Name
Position
Date
Duly authorised for and on behalf of the EA

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®