Hampshire Water Transfer and Water Recycling Project



Adequacy of Consultation Milestone
October 2025



Contents

EXE	cutive	Summary	1
1	Intro	duction	3
	1.1	Purpose of this document	3
	1.2	The Project	3
	1.3	Pre-application consultation	5
	1.4	Programme Document	6
	1.5	Environmental Impact Assessment	6
2	Non-s	statutory Public Consultation 2021	8
	2.1	Approach	8
	2.2	Delivery of the non-statutory Public Consultation 2021	8
	2.3	Consideration of feedback	9
	2.4	Summary	. 11
3	Non-s	statutory Summer 2022 Consultation	. 12
	3.1	Approach	. 12
	3.2	Delivery of the non-statutory Summer 2022 Consultation	. 12
	3.3	Consideration of feedback	. 13
	3.4	Summary	. 22
4	Statu	tory Summer 2024 Consultation	. 24
	4.1	Approach	. 24
	4.2	Delivery of the 2024 Statement of Community Consultation and the statutory Summer 2024 Consultation	. 24
	4.3	Consideration of feedback	. 46
	4.4	Summary	. 55
5	Statu	tory Spring 2025 Consultation	. 56
	5.1	Approach	. 56
	5.2	Delivery of the Statutory Spring 2025 Consultation	. 57
	5.3	Consideration of feedback	. 71
	5.4	Summary	. 81
6	Local	authority views on 'Adequacy of Consultation'	. 82
	6.1	Approach	. 82
	6.2	Summary of local authority views	. 82
7	Next	steps	. 84
	7.1	Further consultation	. 84
	7.2	Ongoing engagement	. 84

7.3	Consultation Report	85
Tables		
Table 1-1 Table 2-1	Consultation stages Summary of issues raised at the non-statutory Public Consultation 202 and how they are shaping the application	21
Table 3-1	Summary of issues raised at non-statutory Summer 2022 Consultation and how they are shaping the application	า 15
Table 4-1	SoCC delivery timetable	25
Table 4-2	SoCC compliance and statutory Summer 2024 Consultation delivery	
Table 4-3	Summary of issues raised at statutory Summer 2024 Consultation and	
Table 5-1	how they are shaping the application	
Table 5-2	Approach to Consultation compliance	
Table 5-3	Summary of issues raised at statutory Spring 2025 Consultation and	-
	how they are shaping the application	71
Table 6-1	Local authority responses with regards to compliance with the Plannin Act 2008	g
Graphics		
	Statistics from the non-statutory Summer 2022 Consultation Statistics from the statutory Summer 2024 Consultation	
Appendi	ces	
Appendix A	Local authority letter and form	86
	Local authority views on adequacy of consultation	
11	, ,	

Executive Summary

This report is the Adequacy of Consultation Milestone (AoCM) submission by Southern Water, the Applicant, to the Planning Inspectorate. Its primary purpose is to summarise the pre-application consultation undertaken for the Hampshire Water Transfer and Water Recycling Project (the Project) and confirm that the Applicant has complied with the statutory consultation requirements set out in the Planning Act 2008. Completing this milestone enables the Planning Inspectorate to assess the adequacy of consultation, thereby reducing potential risks before the formal submission of the Development Consent Order (DCO) application in Spring 2026.

The Applicant has conducted a total of five public consultations, three of which have been statutory, between 2021 and 2025. The Project has evolved through this iterative process, supported by ongoing engagement that has provided continuous feedback. To ensure the consultation process is fair, lawful and worthwhile, the Applicant has applied the Gunning Principles guidelines.

The Applicant has undertaken the following consultations.

Non-statutory Public Consultation 2021 (February to April 2021)

This initial consultation focused on a proposed desalination plant as the preferred solution to the water supply shortfall faced in Hampshire. Feedback raised concerns about the environmental impacts, cost, and energy, with the majority of respondents favouring water recycling and water transfer alternatives. Following this feedback and a further extensive options appraisal, desalination was confirmed as the least preferred option, and the current combination of water transfer and water recycling was identified as the new preferred solution.

Non-statutory Summer 2022 Consultation (July to August 2022)

This stage gathered views on the new approach, including the proposed location of the Water Recycling Plant, pipeline corridors, and locations for Above Ground Plant. Key public concerns included drinking water quality, potential environmental impacts, and potential construction traffic disruption. This feedback helped to refine the proposed pipeline routes and the design of the Project.

Statutory Summer 2024 Consultation (May to July 2024)

This consultation detailed the overall Project, proposed pipeline routes, Above Ground Plant and Water Recycling Plant locations, and preliminary environmental information. The Applicant drafted a Statement of Community Consultation (SoCC) in accordance with relevant legislation and guidance, and in consultation with local authorities. The Applicant complied with this document by carrying out extensive notification and advertising to raise awareness and engage with local communities who might be affected by the construction and operation of the Project.

Feedback themes included the sustainability of the Project, potential health impacts of recycled water, noise and vibration, and environmental water quality concerns related to Havant Thicket Reservoir and the Solent. In response to this feedback and as a result of

WATER from Southern Water

further Project development, the Applicant subsequently shared extensive water quality modelling and made refinements to the design of the Project which were shared at the next consultation.

Statutory Spring 2025 Consultation (March to April 2025)

This consultation focused on updated environmental water quality modelling and the previously noted design refinements. An Approach to Consultation document was drafted by the Applicant and included commitments about how the consultation would be undertaken. This reflected the principles contained in the 2024 SoCC, which allowed for further targeted and proportionate consultation as appropriate. The Applicant met these commitments by publicising the consultation and directly contacting stakeholders.

Feedback questioned the water quality modelling findings, specifically related to potential impacts on the Havant Thicket Reservoir and connected downstream water bodies. Feedback on environmental water quality and the design refinements has been considered in the development of the Project assessments and mitigation, and further refinement of the project design, including the pipeline routes.

Statutory Autumn 2025 Targeted Consultation (September to October 2025)

The Applicant is currently reviewing two responses received to this consultation which was undertaken with landowners on eight localised design refinements. These refinements are minor, and therefore consultation has been limited to those directly affected through land or property interests.

Local authority views

In May 2025, and before the statutory Autumn 2025 Targeted Consultation, local authorities were asked for their views on the Applicant's compliance with the Planning Act 2008. Responses were received from all seven local authorities. All local authorities assessed the Applicant as having complied with the duties to consult and publicise (Sections 42, 47, and 48 of the Planning Act 2008).

Next steps

A Consultation Report and a Statement of Engagement will be submitted with the DCO application. The former will detail the consultations undertaken, and where and how consultation feedback has been considered and used to shape the Project. The latter will summarise the methods of engagement used with stakeholders and communities, and how these activities have influenced the Project's development.

The Applicant has successfully undertaken five public consultations that have followed best practice as set out in the Gunning Principles. This AoCM confirms that the Applicant has complied with the statutory requirements set out in the Planning Act 2008.



1 Introduction

1.1 Purpose of this document

1.1.1 On 30 April 2024, the Government published the 'Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects' guidance, the 'Pre-application Guidance 2024', and introduced the Adequacy of Consultation Milestone (AoCM). The AoCM allows early consideration by the Planning Inspectorate of the adequacy of consultation undertaken by the Applicant and therefore reduces risk at the acceptance stage of the Development Consent Order submission. The Pre-application Guidance 2024 sets out:

'The AoCM should be early enough to enable applicants to consider how to undertake any additional engagement that may be needed, but sufficiently towards the end of the pre-application stage to assess the adequacy of the consultation that has been done. It is likely therefore to be no later than around 3 months before the intended date of submission of the application.

'The AoCM milestone should be recorded by the Applicant and submitted to the Planning Inspectorate as a short statement of the elements of consultation which have been carried out compared with the components set out in the Programme Document and the SoCC. The statement should include the views and any relevant supporting material from local authorities if available.

'The AoCM is an informal but nonetheless important opportunity to check that the pre-application programme is on track, and if it is seriously adrift the Planning Inspectorate will advise the Applicant about the steps necessary to enable the application to be submitted having fulfilled the statutory requirements. Inevitably this could mean a renegotiation of the expected date of submission, with the objective of avoiding the prospect of an application not being accepted for examination.'

- 1.1.2 In addition to the Pre-application Guidance 2024, the Planning Inspectorate issued the 'Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus' (October 2025), the 'Pre-application Prospectus 2024'. Both the Pre-application Guidance 2024 and Pre-application Prospectus 2024 set out the requirements for the AoCM.
- 1.1.3 This report provides an overview of the engagement and consultation activity to date and how Southern Water Services Limited (hereafter referred to as 'the Applicant') has complied with the Planning Act 2008 statutory consultation provisions and submitted this report in accordance with the Pre-application Guidance 2024 and Pre-application Prospectus 2024.

1.2 The Project

1.2.1 The Hampshire Water Transfer and Water Recycling Project (hereafter referred to as 'the Project') is being developed by the Applicant who is responsible for supplying water and wastewater services to over four million customers in the South East of England. The Applicant's operations cover Hampshire, Kent, the Isle of



- Wight and East and West Sussex, over 700 miles of coastline, National Parks, forests and Areas of Outstanding Natural Beauty (National Landscapes).
- 1.2.2 The South East of England is designated by the Environment Agency as an area of 'serious water stress', meaning that demand can outstrip supply, especially during a drought. The Environment Agency has said an extra 5 billion litres of water a day needs to be found by 2055 in the UK, with half of this being in the South East. In Hampshire in particular, a growing population, climate change and reduced abstractions on the County's two main rivers, the River Test and River Itchen chalk streams, mean the Applicant is facing a significant water supply shortfall. The Project, which is part of the Applicant's Water for Life Hampshire programme, is being undertaken to address this challenge by providing a new, sustainable source of water ensuring a resilient water supply for its Hampshire supply area.
- 1.2.3 The Applicant's existing Water Resources Management Plan (WRMP19), which forecasts future water demand and sets out options to address this, identifies the need for a strategic water resource option within the Western (Hampshire) supply area, from which the Project has been determined as the preferred solution to meet this need. The Applicant's emerging WRMP24 (final draft published in 2025) continues to identify the Project as the only solution capable of addressing this challenge.
- 1.2.4 The Project comprises the construction, operation and maintenance of the following components:
 - Water Recycling Plant and associated pumping stations.
 - Underground pipelines between Budds Farm Wastewater Treatment Works and the Water Recycling Plant.
 - Pipelines between the Water Recycling Plant site and Bedhampton Springs, connecting into pipelines being delivered by Portsmouth Water between Bedhampton Springs and Havant Thicket Reservoir.
 - Underground pipeline between the Water Recycling Plant site and Otterbourne Water Supply Works.
 - Above Ground Plant comprising Intermediate Pumping Stations and Break Pressure Tanks located along the Pipeline between the Water Recycling Plant and Otterbourne Water Supply Works.
- 1.2.5 The Project would also comprise the use of the following infrastructure:
 - Use of Havant Thicket Reservoir for the storage of recycled water.
 - The use of the Eastney Long Sea Outfall, Eastney Pumping Station, and Eastney Transfer Tunnel for the release of reject water (containing impurities removed from the treated wastewater) from the Water Recycling Plant.
 - The use of pipelines consented separately by Portsmouth Water for the transfer of recycled water and source water between Bedhampton Springs and Havant Thicket Reservoir.
- 1.2.6 The construction and operation of the Project would include other works such as landscaping and environmental mitigation measures.



1.3 Pre-application consultation

- 1.3.1 The Applicant acknowledges that the Planning Act 2008 places significant emphasis on pre-application consultation. Accordingly, substantial effort has been dedicated to undertaking meaningful engagement and consultation with the local community, persons with an interest in land, local authorities, statutory consultees, and other relevant stakeholders. As a result, the Project has evolved through an iterative process and multiple stages of project development.
- 1.3.2 The Gunning Principles provide guidelines for effective consultation. The Applicant has used these principles, which are engaging early, providing sufficient information, allowing adequate time, and considering responses, to each stage of pre-application consultation to ensure the process is fair, lawful and worthwhile.
- 1.3.3 The main stages of the Applicant's pre-application consultation are summarised in **table 1-1**. The terms summarised in **table 1-1** are used throughout this report to describe specific consultation stages.

Table 1-	1 Consultatio	n stages
B-1-		

Date	Consultation activity
8 February to 16 April 2021	Non-statutory Public Consultation 2021
5 July to 16 August 2022	Non-statutory Summer 2022 Consultation
16 February to 19 April 2024	Consultation on the 2024 Statement of Community Consultation (SoCC)
29 May to 23 July 2024	Statutory Summer 2024 Consultation
5 March to 4 April 2025	Statutory Spring 2025 Consultation
10 September to 8 October 2025	Statutory Autumn 2025 Targeted Consultation

- 1.3.4 Consultation with stakeholders and the local community is playing a key role in shaping decisions at various stages throughout the evolution of the Project, including decisions regarding use of water recycling, the preferred pipeline corridors, the proposed locations for Above Ground Plant and the proposed pipeline routes. Consultation has also helped inform the scope of the environmental assessments, seeking views on preliminary environmental impacts and shaping mitigation proposals.
- 1.3.5 Consultation is being carried out at multiple stages of the Project to strike a balance between engaging early and ensuring sufficient detail is available for consultees to provide meaningful feedback. This approach enables the Applicant to meaningfully consider input during the iterative design process of the Project. At each consultation stage to date, the Applicant presented information as clearly as possible in different forms and media to enable in person and online access, outlining how stakeholders could participate, and provided defined deadlines and formats for submitting feedback. The Applicant also considered accessibility when planning consultation events and used targeted engagement with seldom heard groups.
- 1.3.6 In between formal consultation activities, the Applicant has engaged with stakeholders through Local Planning Authority Joint Officer Group meetings,



Environmental Impact Assessment (EIA) Working Groups, bilateral meetings, and other direct engagement with local interest groups, members of the public, and statutory organisations.

1.4 Programme Document

- 1.4.1 In accordance with the Planning Inspectorate issued Pre-application Prospectus 2024 and Pre-application Guidance 2024, the Applicant has prepared a pre-application Programme Document. It sets out the main steps that the Applicant anticipates taking during the preparation of the DCO application. Whilst not a statutory requirement, it sets out the timetable and activities necessary for an effective pre-application process. The components set out in the Programme Document are explained in the AoCM.
- 1.4.2 The Programme document was initially provided by the Applicant to the Planning Inspectorate in July 2024. An updated version of the Programme Document was issued in October 2025 and is available to view on the Applicant's consultation website at https://www.hampshirewtwrp.co.uk.

1.5 Environmental Impact Assessment

- 1.5.1 Environmental Impact Assessment (EIA) assesses the likely significant effects of the Project during the construction, operation (including maintenance) and decommissioning phases of the Project. It is an iterative process that identifies and describes likely significant effects of the Project on the environment. It seeks to avoid or reduce negative environmental effects through mitigation, where appropriate, and promote positive effects as a result of the Project, culminating in the preparation of an Environmental Statement that is submitted with the DCO application. The Environmental Statement that is currently being prepared is taking into account and being influenced by:
 - Findings of the EIA Scoping Report submitted on 21 July 2023 taking account of the EIA Scoping Opinion adopted by the Secretary of State on 31 August 2023.
 - The preliminary assessment findings and likely significant effects of the Project set out in the Preliminary Environmental Information (PEI) Report shared at the statutory Summer 2024 Consultation and Environmental Water Quality Report shared at the statutory Spring 2025 Consultation.
 - Consultation responses received from the non-statutory Summer 2022 Consultation, the statutory Summer 2024 Consultation and statutory Spring 2025 Consultation.
 - Other comments and feedback received from statutory consultees and stakeholders during the pre-application and EIA process through separate engagement.
- 1.5.2 Consultation feedback is helping to shape the approach to environmental assessment, as well as the development of appropriate mitigation. All mitigation measures taken into account in the EIA will be set out in a Commitments Register.



Hampshire Water Transfer and Water Recycling Project Adequacy of Consultation Milestone

to be submitted as part of the DCO application, that will confirm how identified mitigation will be secured within the DCO.



2 Non-statutory Public Consultation 2021

2.1 Approach

- 2.1.1 The purpose and intent of the non-statutory Public Consultation 2021 was to consult on the Applicant's desalination proposal, as presented in the Water Resources Management Plan (WRMP) 19 Preferred Strategy. A 75 Ml/d (million litres per day) desalination plant was proposed at Fawley with direct input into the Applicant's water supply network at Testwood Water Supply Works via a proposed underground pipeline. The desalination proposal was presented as the 'base case' and the preferred solution at the time.
- 2.1.2 As required by the Regulators Alliance for Progressing Infrastructure Development (RAPID) Gated process, alternative options also needed to be investigated in the event that desalination should prove not to be deliverable. The alternatives consulted on were a smaller capacity desalination proposal, alongside water recycling and water transfer proposals. These were described as back-up solutions.
- 2.1.3 The non-statutory Public Consultation 2021 was proposed to be six weeks in length, and although the UK government lifted some COVID-19 restrictions on 8 March 2021, the Applicant adopted a 'digital first' approach as consultation activities, such as in-person events, were not possible at the time.

2.2 Delivery of the non-statutory Public Consultation 2021

- 2.2.1 The non-statutory Public Consultation 2021 was launched on 8 February 2021 and was scheduled to close on 23 March 2021. The consultation was extended from the original 42 days following feedback from residents of Fawley suggesting they had not been contacted directly or had not seen the consultation promotion. The Applicant responded by distributing notification letters and extended the non-statutory Public Consultation 2021 to close on 16 April 2021.
- 2.2.2 To promote the non-statutory Public Consultation 2021, the Applicant shared communications across its Facebook, Twitter and LinkedIn pages throughout the consultation period to raise awareness. In the Applicant's initial engagement with each of the affected Local Planning Authorities, support was requested to help to improve the reach of digital communications. As a result, the consultation links were shared via numerous newsletters, mailing lists and social media channels, including the Local Planning Authorities' social media channels. A similar request was also made to other organisations and individual stakeholders to share via their networks. A total of 14 posts were published, including a Facebook advertisement.
- 2.2.3 A consultation press release was issued to local publications, radio and trade press on 8 February 2021. Advertorials were placed in local newspapers.
- 2.2.4 The Applicant sent notification emails and letters to statutory stakeholders as well as relevant non-statutory stakeholders and people who had expressed an interest in the desalination proposal and had provided contact information. Additionally, the Applicant asked Local Planning Authorities to provide details of seldom heard



- groups to enable the Applicant to contact these groups to advise them of the consultation.
- 2.2.5 The Applicant updated the Water for Life Hampshire Programme's website with details of the consultation and to direct people to a virtual exhibition to have their say on the proposals.
- 2.2.6 The virtual room was set up so the public and stakeholders could access consultation material during a time of COVID-19 restrictions which prevented inperson public exhibitions. The virtual room attracted 3,224 visitors where consultation material could be viewed, and an online feedback form was available to give feedback. Consultees could also submit feedback by email.

2.3 Consideration of feedback

- 2.3.1 The Applicant received 180 responses. These were split into 143 online feedback form submissions and 37 emails and letters.
- 2.3.2 In September 2021, the Applicant published a Consultation Feedback Report which provides a summary of the consultation activities and an overview of the main themes that emerged from the consultation responses.
- 2.3.3 **Table 2-1** below provides a summary of the feedback themes that were identified throughout the non-statutory Public Consultation 2021 and how these responses are shaping the Applicant's final proposals.

Table 2-1 Summary of issues raised at the non-statutory Public Consultation 2021 and how they are shaping the application

Issue raised at consultation	How consultation responses are shaping the application	
The Applicant received feedback that suggested alternatives to desalination due to energy, cost and environmental impacts. Some respondents perceived that water transfer alternatives would have fewer environmental impacts and lower costs.	Following the non-statutory Public Consultation 2021, the Applicant undertook an extensive options appraisal which confirmed desalination as the least preferred option. The combined solution of water transfer and water recycling, which is the Project, emerged as the most preferred solution to address the water supply deficit in Hampshire.	
The Applicant received feedback about the drinking water quality from the proposed desalination plant.	The Applicant acknowledges that although desalination is no longer being pursued, concerns around drinking water continue to be taken into consideration as part of the Project.	
The Applicant received feedback regarding the impact of the wastewater (brine) release into the Solent, with respondents questioning the location of the	Impacts on the Solent were one of the contributing factors for the decision not to progress the desalination option further. As a result, despite water quality impacts still being considered as part of the Project, it is	



Issue raised at consultation	How consultation responses are shaping the application
release due to its shallow depths, possible effects on the tidal flow and impact on bathing water quality and recreational activity.	no longer of concern in this area of the Solent.
The Applicant received feedback regarding the impact of abstraction and discharge pipes, particularly the impact of construction on the seabed off Calshot and possible fish entrainment in the pipelines.	Although the desalination proposal is no longer being pursued and these matters are no longer a concern in this area, the Applicant continues to consider these themes within the Project.
The Applicant received feedback regarding the impact the desalination process would have on biodiversity. In particular the possible impact of abstracting water from the Solent for the desalination process and discharging cleaned wastewater (brine) on the marine environment.	Although the desalination proposal is no longer being pursued and these impacts are no longer a concern in this area, impacts on the water environment continue to be taken into consideration as a part of the Project
The Applicant received suggestions that the proposed desalination plant should be located on a brownfield site or located away from residential areas and Ashlett Creek, as respondents were worried about further urbanisation of waterside developments.	As desalination is not being progressed by the Applicant at this time, the siting of the proposed desalination plant is no longer a concern. However, a similar approach to site selection was considered in the identification of the site for the proposed Water Recycling Plant.
The Applicant received feedback regarding the landscape and visual impact of the proposed desalination plant. This concern was particularly in regard to the proximity to the New Forest National Park, the coast and the surrounding area.	Landscape and visual impact of the desalination plant on the New Forest National Park was one of the contributing factors for the decision not to progress the desalination option further. As a result, landscape and visual impacts are no longer of concern in this area, but continue to be considered as part of the Project.
The Applicant received feedback relating to impacts on many aspects of the environment.	The desalination plant and associated underground pipelines are no longer being pursued, and therefore their potential environmental impacts are no longer

WATER from Southern Water

Issue raised at consultation	How consultation responses are shaping the application
	relevant in this area. However, feedback relating to potential environmental impacts is being considered as part of the Project the Applicant is now progressing.

2.4 Summary

- 2.4.1 Results from the non-statutory Public Consultation 2021 showed that a significant proportion of respondents agreed that water recycling alternatives would be an acceptable alternative to a desalination plant at Fawley. Considering this, and the feedback received from consultees on the desalination process and potential impacts on the environment, an Options Appraisal Process was carried out in 2021. This appraisal confirmed that a desalination plant at Fawley was the least preferred option, and water transfer and water recycling emerged as the new preferred solution. The Applicant engaged with regulators and other stakeholders on the options appraisal process and confirmed the new preferred solution in December 2021.
- 2.4.2 Ahead of the non-statutory Summer 2022 Consultation, the Applicant undertook further site selection for the Water Recycling Plant, developed pipeline corridors and established Above Ground Plant zones.



3 Non-statutory Summer 2022 Consultation

3.1 Approach

- 3.1.1 The Applicant presented the Project as a drought resilience scheme and undertook consultation to gather views on the initial proposals.
- 3.1.2 The Applicant consulted on and invited feedback regarding:
 - The use of water recycling as a new sustainable water source for the Hampshire area.
 - The location of the proposed Water Recycling Plant.
 - The preferred corridors for the pipelines required to transfer water between Budds Farm Wastewater Treatment Works, the proposed water recycling plant, Havant Thicket Reservoir and Otterbourne Water Supply Works.
 - The proposed zones for Above Ground Plant required along the pipeline route to Otterbourne Water Supply Works.
 - The decision-making processes the Applicant followed in each case to identify sites, zones and pipeline corridors.
- 3.1.3 A hybrid approach was taken to consultation, with information available online on a dedicated Project website, through webinars and in-person events.
- 3.1.4 The strategy was to undertake the non-statutory consultation using the same principles that would be used for subsequent statutory consultations. This included consulting the parties that would be required to be consulted for the statutory consultation under Section 42 of the Planning Act 2008, and non-statutory consultees.
- 3.1.5 Non-statutory consultees were selected during a stakeholder mapping exercise undertaken by the Applicant, to account for geographical change and to establish stakeholders in the affected area and those that may be interested in the Project. This was undertaken by referring to and reviewing information held by the Applicant on consultees and collaborating closely with relevant stakeholders and local authorities to ensure that information was correct and updated. Consultation zones were also established to manage consultee notification. Seldom heard groups were identified by collaborating with the local authorities to ensure that information about these groups was available to the Applicant.
- 3.1.6 On 28 April 2022, the Applicant presented its approach to consultation at a Joint Officer Group meeting and requested feedback.

3.2 Delivery of the non-statutory Summer 2022 Consultation

- 3.2.1 The non-statutory Summer 2022 Consultation was held from 5 July to 16 August 2022 for a total of six weeks.
- 3.2.2 The Applicant undertook several activities to publicise the non-statutory Summer 2022 Consultation across its identified Consultation Zones. Activities undertaken included:

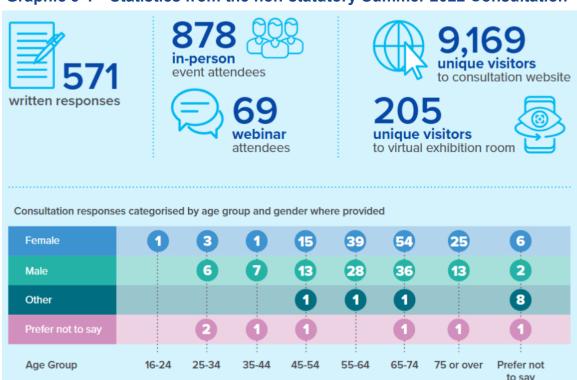


- Letters sent to persons with an interest in land in respect of the Project and those within the Primary Consultation Zone (properties and businesses that lay 500 metres either side of the corridor sections)
- Advertisements placed in local newspapers to reach those in the Secondary Consultation Zone (a zone that extended to the boundaries of Parish Councils that crossed the corridor sections which were located within the Primary Consultation Zone)
- Posters distributed to key locations to reach those in the Secondary Consultation Zone
- Stakeholder briefings (on an invitation only basis).
- 3.2.3 Consultation materials were made available on the website for the Project, hosted on Commonplace, and at nine deposit locations. The consultation materials contained information about the Project and included:
 - Consultation Brochure Public Consultation 2022
 - Scheme Development Summary Public Consultation 2022
 - Book of Maps Public Consultation 2022
 - Frequently Asked Questions (FAQs)
 - The feedback form alongside the data protection statement.
- 3.2.4 During the non-statutory Summer 2022 Consultation, the Applicant hosted six dropin sessions, and three webinars where those who were interested could register to attend.
- 3.2.5 The following response methods were available for people to provide feedback during the consultation:
 - An online feedback form available via the website
 - Hard-copy feedback form
 - A freepost address (FREEPOST HAMPSHIRE WTWRP CONSULTATION) was set up so respondents could send either the printed feedback form or other feedback to the Project
 - Feedback could be emailed to the dedicated email address for the Project: HampshireWTWRP@southernwater.co.uk

3.3 Consideration of feedback

3.3.1 A total of 571 responses to the consultation were received, this included 69 hard-copy feedback forms via the freepost address, 449 online feedback forms, and 53 emails. **Graphic 3-1** below shows other statistics for the non-statutory Summer 2022 Consultation.





Graphic 3-1 Statistics from the non-statutory Summer 2022 Consultation

- 3.3.2 In May 2024, and as part of the statutory Summer 2024 Consultation, the Applicant published a Summer 2022 Consultation Response to Feedback Report which provides a summary of the consultation activities, an overview of the main themes that emerged from the consultation responses, and an explanation of how the Applicant had been considering the issues raised in the development of the Project. The responses included in the Summer 2022 Consultation Response to Feedback Report represent a point in time and the Applicant continues to refine the design of the Project.
- 3.3.3 **Table 3-1** below provides a summary of the feedback themes that were identified throughout the non-statutory Summer 2022 Consultation and how these responses are shaping the Applicant's final proposals.



Table 3-1 Summary of issues raised at non-statutory Summer 2022 Consultation and how they are shaping the application

constitution and new tiley are shaping the application			
Issue raised at consultation	How consultation responses are shaping the application		
The Applicant received feedback about the quality of drinking water and potential changes to its taste and smell.	Between 2019 and 2023, the Applicant developed a Water Recycling Pilot Plant with Brighton University to replicate the water recycling process. An aim of this activity was to discuss the technology with stakeholders, and to alleviate customer and stakeholder concerns. The Applicant continues to reassure stakeholders that drinking water will continue to meet strict regulatory standards, which are regulated and overseen by the Drinking Water Inspectorate (DWI), and has confirmed that a communications plan is being developed and will be put in place to keep customers informed when a change in water source takes effect.		
The Applicant received feedback around the potential environmental impacts of recycled water on biodiversity, wildlife and ecology.	The Applicant's Summer 2022 Consultation Summary of Feedback Report noted the Applicant was working with Portsmouth Water to consider water quality and that environmental assessments would be undertaken to consider impacts and mitigation to ensure the local environment and marine life is protected during the delivery of the Project. Further information was subsequently shared at later stages of consultation and feedback from this continues to inform the Applicant's methodology, assessments and any necessary mitigations.		
The Applicant received feedback on the level of information provided about the potential environmental impacts of releasing reject water (water containing impurities removed from the treated wastewater) into marine environment.	assessments and any necessary miligations.		
The Applicant received feedback around the sustainability of the water	The Applicant acknowledged this feedback in the Summer 2022 Consultation Response to Feedback Report which was published on the		



Issue raised at consultation	How consultation responses are shaping the application
recycling process and the energy and maintenance to build and operate the Water Recycling Plant.	Project website in May 2024. It noted that its consideration of alternatives had resulted in the selection of water recycling and transfer as the most sustainable solution and that consideration of energy and carbon will help reduce emissions during the construction and operation phases. The Applicant provided information on the Project's likely impacts and mitigation at subsequent stages of consultation and continues to consider feedback as it develops the assessments, mitigation and management plans as part of the DCO application in Chapter 10 of the Environmental Statement.
The Applicant received feedback surrounding the potential for disrupting areas of natural beauty, as well as potential visual impacts on the local landscape.	The Applicant acknowledged this feedback in its Summer 2022 Consultation Response to Feedback Report, published on the Project website in May 2024. It noted that it was continuing to undertake a variety of surveys, studies and investigations, as well as engagement with local authorities and key stakeholders to inform the design of the Project to avoid or reduce landscape and visual impacts. This continues to be the case as the Project is refined prior to the DCO application submission.
The Applicant received feedback around the potential impact on the local road network during construction, particularly on Park Lane, Middle Park Way, Titchfield Lane, Knowle Road, Portsdown Hill and Bedhampton Road.	The Applicant acknowledges this feedback surrounding traffic and transport and noted that various issues and constraints had been taken into account in developing the design up to non-statutory Summer 2022 Consultation and that surveys and assessments, as well as engagement with the local highway authorities and National Highways, would continue to inform the development of the Project and the next stage of consultation.
	Titchfield Lane and Bedhampton Road will be assessed in Environmental Statement Chapter 18 Traffic and Transport and, separately, the Transport Assessment. There would be minimal impact on Bedhampton Road. Construction traffic impacts on



Issue raised at consultation	How consultation responses are shaping the application
	Titchfield Lane would be managed through the Framework Construction Traffic Management Plan. Following the statutory Summer 2024 Consultation, the temporary construction compound access has been relocated to the east, closer to the junction with the A334. This reduces potential impacts of construction traffic on residential receptors along Titchfield Lane.
	Knowle Road is not assessed in Chapter 18 of the Environmental Statement and the Transport Assessment as there would be no impact on this road. Middle Park Way and Park Lane would not be impacted following the tunnel option to Havant Thicket Reservoir being removed and are also excluded from the assessment as a result.
	The Applicant is also engaging closely with Hampshire County Council on all highway matters. Information about environmental impacts from the Project's construction, including proposed mitigation, were consulted on as part of the Applicant's statutory Summer 2024 and Spring 2025 Consultations and will be reported on in various chapters of the Environmental Statement. The Applicant continues to work with the local highway authorities and National Highways to address and mitigate likely impacts on the local road network, informing the measures included in the traffic management plans that will be submitted as part of the DCO application.
	Project-wide measures to control construction dust, including dust arising from track out (heavy vehicles leaving the site and transferring material to the local highway network), as well as proposed emissions standards to reduce construction road vehicle emissions and a proposed Construction Worker Travel Plan that supports and encourages sustainable travel, are contained within the Outline Construction Environmental Management Plan (CEMP).



Issue raised at consultation	How consultation responses are shaping the application
The Applicant received feedback around potential landfill gas emissions from the Water Recycling Plant site (previously referred to as Site 72) and other environmental impacts including dust and noise pollution.	The Applicant acknowledged this feedback in its Summer 2022 Consultation Summary of Feedback Report, published on the Project website in May 2024. The report noted that the Applicant was continuing to undertake a variety of surveys, studies and investigations, as well as engagement with relevant stakeholders to inform the design of the Project to avoid and reduce construction related impacts, including those arising from construction works in areas of landfill.
	Where landfill gas risks have been identified through the Applicant's investigations and assessments, ground gas protection measures will be incorporated into the detailed construction design. These measures would be secured in the design principles for safety and set out in the Design Principles Document which will be submitted as part of the DCO application.
	Dust and noise emissions measures to reduce impacts will be set out in the Outline Construction Environment Management Plan. This will be further developed by the appointed Contractor at the detailed design stage.
The Applicant received feedback around the location of Above Ground Plant and the interface with the historic environment.	The Applicant acknowledged this feedback in its Summer 2022 Consultation Summary of Feedback Report, published on the Project website in May 2024. It noted that it was continuing to refine the design of the Project, alongside ongoing surveys and investigations, as well as engagement with local authorities and Historic England, to avoid and reduce impacts on the historic environment. This continues to be the case as the Project is refined prior to the DCO application submission.
The Applicant received feedback surrounding impacts on Hampshire's underground aquifers during construction.	The Applicant is taking into consideration the importance of the underlying aquifers through design development and the EIA process. The potential impacts on the underground aquifers and dependent receptors, such as



Issue raised at consultation	How consultation responses are shaping the application
	public water supply abstractions, during construction will be assessed within the Hydrogeological Impact Assessment (HIA) which is informing the mitigation requirements. The Applicant has looked to reduce intrusive works within the most sensitive areas, such as Source Protection Zone 1, where practicable. The impacts on underlying aquifers has been discussed with key stakeholders such as the Environment Agency and Portsmouth Water throughout the EIA process at Technical Working Groups, one-to-one engagement and through pre-application review of key documents, such as the HIA and Outline Water Monitoring Plan.
The Applicant received feedback around potential vibration impacts on nearby properties during pipeline installation using tunnelling techniques.	The Applicant acknowledged this feedback in its Summer 2022 Consultation Summary of Feedback Report, published on the Project website in May 2024. Mitigation of vibration impacts on nearby properties has been embedded into the design of the Project by locating those elements with the potential to emit vibration during construction (such as tunnelling) as far as practicable from residential dwellings. It noted that it was continuing to undertake a variety of surveys, studies and investigations, as well as engagement with local authorities and key stakeholders to inform the design of the Project to avoid and reduce potential vibration impacts on nearby properties during pipeline installation using tunnelling techniques. This, along with all construction impacts, continues to be the case as the Project is refined up to the DCO application.
	Potential mitigation measures for vibration impacts are identified in the Outline Construction Environment Management Plan, and the final package of mitigation will be identified by the appointed Contractor in a Noise and Vibration Management Plan which will be submitted to the local authorities for



Issue raised at consultation	How consultation responses are shaping the application
	approval prior to commencement of construction.
The Applicant received feedback around the Water Recycling Plant's ability to remove impurities such as chemicals, hormones and microbes.	The Applicant continues to provide assurance around the efficacy of the water recycling process and the fact that water going into supply will continue to meet strict regulatory standards on drinking water quality. These standards are regulated and overseen by the Drinking Water Inspectorate. The Applicant has also undertaken engagement with relevant stakeholders as part of the Water Recycling Pilot Plant, with a particular focus on those based in the Havant area, and carried out a subsequent consultation on environmental water quality, the statutory Spring 2025 Consultation, feedback from which continues to inform the development of the Applicant's assessments and mitigation.
The Applicant received feedback regarding any possible implications should the pipeline burst.	The Applicant has designed the Project to ensure that the probability of a pipeline bursting is extremely low. Nonetheless, the Applicant set out in its statutory Summer 2024 Consultation how major accidents and disasters would be managed, and this will again be set out as part of the DCO application in the Environmental Statement. This will detail that a 6m strip of land either side of the entire alignment of the pipelines would be required to restrict certain activities that could adversely affect the infrastructure. These activities include prevention of piling or percussive activities, prevention of building a wall or structure (unless easily removed), and anything that could endanger the pipe and cause a leak. This is in line with design principles for safety which will be outlined in the Design Principles Document which will be submitted with the DCO application.
	Isolation valves would be installed on the pipelines to manage flooding in the unlikely event of a burst. Further mitigation for the risk of flooding and pipe leaks during the operation of the Project will be detailed in the



Issue raised at consultation	How consultation responses are shaping the application
	Outline Operational Management Plan. This includes the formation of an incident team and its operation and de-escalation. These measures will further help to reduce potential flooding from a pipe burst.
The Applicant received feedback around how Havant Thicket Reservoir should only be fed by spring water.	The Applicant acknowledges this feedback, however, the proposed use of Havant Thicket Reservoir for storing recycled water remains a key part of the proposal which is embedded in the need for the Project. It also provides resilience to Havant Thicket Reservoir in times of low water levels. Nevertheless, additional information on recycled water quality was presented in the subsequent statutory Spring 2025 Consultation and feedback from that consultation continues to inform the Applicant's assessments and mitigation in this respect.
The Applicant received feedback around how the pipeline would safely cross under rivers and other waterways.	Engagement regarding the proposed construction methodology has been a key focus of the consultation process. This topic has been discussed in detail through Technical Working Groups held with the Environment Agency, Natural England and local authorities, ensuring that relevant stakeholders are informed and have the opportunity to provide input. Our design proposes the use of trenchless construction methods for crossing main rivers. For other waterways, we are proposing use of both trenchless and open-cut techniques informed by the sensitivity of the watercourses and agreement with key statutory environmental bodies. Construction compounds for these crossings have been sited outside areas liable to flood and sensitive river corridor habitats.
The Applicant received feedback around consultees wanting to be consulted earlier in the process and felt that not	The Applicant has explained at each key stage of consultation how the selection of this Project was informed by a comprehensive options appraisal process undertaken in 2021, as well as through the development of WRMP19 and final draft WRMP24. These

WATER Southern Water

Issue raised at consultation	How consultation responses are shaping the application
enough alternatives had been considered.	processes considered a wide range of potential solutions, initially including desalination and subsequently focusing on water recycling. In addition to four rounds of consultation specifically on this Project the Applicant has also consulted extensively on the WRMPs themselves, including the options presented. This ongoing engagement has ensured that stakeholders have had multiple opportunities to review and comment on the Project and the processes undertaken to select the Project. These comments and responses have been taken into account in the design, assessment, mitigation and development of the Project.
The Applicant received feedback on the proposed location of the Water Recycling Plant (previously referred to as Site 72).	High-level outcomes from the Water Recycling Plant site selection process were initially presented as part of the Applicant's non-statutory Summer 2022 Consultation. Having regard to consultation feedback, a review of the site selection process was undertaken which reaffirmed the original outcome, with no changes to the preferred site identified. This was communicated as part of the Applicant's statutory Summer 2024 Consultation, and the Applicant continues to ensure its site selection process remains robust in light of ongoing stakeholder feedback.
The Applicant received feedback that suggested respondents were not clear why desalination was no longer the preferred option.	The Applicant explained during its non- statutory Summer 2022 Consultation and statutory Summer 2024 Consultation that desalination was no longer preferred because of its potential impacts on the New Forest National Park and the Solent.

3.4 Summary

3.4.1 In preparation for the statutory Summer 2024 Consultation, the Applicant reviewed all the feedback received at non-statutory Summer 2022 Consultation and assessed whether design changes to the Project were needed. The Applicant detailed this process in in its 2024 Scheme Development Summary, presented as part of the Applicant's statutory Summer 2024 Consultation. This document listed



Hampshire Water Transfer and Water Recycling Project Adequacy of Consultation Milestone

- the changes made along with the considerations outlined from feedback at non-statutory Summer 2022 Consultation.
- 3.4.2 One of the major aspects of the Project where feedback has informed the design is the Applicant's proposed pipeline routes. Feedback has informed the development of the Project from multiple options and corridors, and considered various constraints and issues to identify more specific proposed route alignments.
- 3.4.3 The pipeline corridors at the non-statutory Summer 2022 Consultation were divided into sections so that each section could be evaluated and compared against other pipeline corridor sections. The outcome of this process was the selection of a preferred pipeline corridor which was then consulted upon. These sections were then reviewed based on feedback received at non-statutory Summer 2022 Consultation to develop Sections A through M from the Water Recycling Plant to Otterbourne Water Supply works. These, along with the locations of Above Ground Plant, were presented at the statutory Summer 2024 Consultation. The location of construction compounds along the pipeline route were also carefully reviewed in light of feedback received. These pipeline routes continue to be refined due to ongoing feedback and engagement.



4 Statutory Summer 2024 Consultation

4.1 Approach

- 4.1.1 As part of the statutory Summer 2024 Consultation, the Applicant consulted on the following matters:
 - The Project overall.
 - The proposed pipeline routes.
 - The proposed Water Recycling Plant and associated pumping stations.
 - The proposed sites for the Above Ground Plant along the pipeline route.
 - The process undertaken to develop the Project up to this consultation.
 - The preliminary environmental and other impacts of the Project and initial proposals for mitigation.
- 4.1.2 The Applicant undertook an eight-week statutory consultation on the Project, which was in line with sections 42, 45, 46, 47 and 48 of the Planning Act 2008. The statutory Summer 2024 Consultation took place between 29 May 2024 and 23 July 2024.

4.2 Delivery of the 2024 Statement of Community Consultation and the statutory Summer 2024 Consultation

- 4.2.1 The purpose of the 2024 Statement of Community Consultation (2024 SoCC) is to set out how the Applicant would consult with the local community likely to be affected by the Project at the statutory Summer 2024 Consultation. The 2024 SoCC has been used by the Applicant as a reference at subsequent statutory consultations. The 2024 SoCC set out when the consultation would be held, the information to be included in the consultation, who would be consulted, and the approach and tools that would be used to reach consultees and gather their views. The 2024 SoCC fully complied with the statutory requirements and government guidance on pre-application consultations for DCOs.
- 4.2.2 Section 47(2) of the Planning Act 2008 states that 'before preparing the statement, the applicant must consult each local authority that is within section 43(1) about what is to be in the statement'. Prior to the statutory consultation on the draft 2024 SoCC, the relevant Section 43(1) local authorities in relation to the Project, were invited via email to provide initial advance comments on the draft 2024 SoCC.
- 4.2.3 The local authorities are as follows:
 - East Hampshire District Council
 - Eastleigh Borough Council
 - Fareham Borough Council
 - Hampshire County Council



- Havant Borough Council
- Portsmouth City Council
- Winchester City Council.
- 4.2.4 The timeline below details how the 2024 SoCC was delivered, including the consultation on the 2024 SoCC with local authorities and when it was finalised and made available to view. Local authority comments on the draft 2024 SoCC and regard had to these comments will be reported in the Consultation Report submitted with the DCO application.

Table 4-1 SoCC delivery timetable

Description	Date	Detail
Start of initial advance consultation on the draft 2024 SoCC	16 February 2024	Draft 2024 SoCC issued to local authorities, but including South Downs National Park on a non-prescribed basis for initial advance comment.
End of initial advance consultation on the draft 2024 SoCC	1 March 2024	Feedback from the initial advance consultation incorporated into the draft 2024 SoCC. Examples included publishing the Section 48 notice in the Hampshire Independent newspaper, providing clarity on what consultees would be able to comment on, and updating the proposed deposit locations.
Start of statutory consultation on the draft 2024 SoCC	13 March 2024	Statutory consultation with local authorities starts on the draft 2024 SoCC.
Re-start of statutory consultation on the draft 2024 SoCC	21 March 2024	Statutory consultation restarted with local authorities due to the Applicant making amends to the draft 2024 SoCC regarding what the Applicant was consulting on. Local authorities were given at least 28 days to comment.
East Hampshire District Council's statutory consultation period	16 April 2024	East Hampshire District Council had been omitted from the statutory consultation period in error. The Council was informed that it would have a full 28 days to provide feedback with a deadline of 15 May 2024.



Description	Date	Detail
End of statutory consultation on the draft 2024 SoCC	19 April 2024	End of statutory consultation on the draft 2024 SoCC for all local authorities (other than East Hampshire District Council). Feedback provided to the Applicant.
End of statutory consultation for East Hampshire District Council	15 May 2024	End of statutory consultation for East Hampshire District Council. Feedback received on 30 April 2024.
The Applicant finalised the 2024 SoCC	15 May 2024	The Applicant incorporated feedback following the statutory consultation and finalises the document. Examples of changes made to the 2024 SoCC as a result of local authority feedback included adding an explanation of why the Long Sea Outfall was not included in a Consultation Zone, and including businesses in the description of relevant Consultation Zones.
Publication of the 2024 SoCC notice in local newspapers	27 May and 30 May 2024	2024 SoCC Section 47 Notice published in the below local newspapers: The News (Portsmouth) Southern Daily Echo Hampshire Chronicle
Final 2024 SoCC made available	29 May 2024	Final 2024 SoCC made available at deposit locations and the dedicated consultation website.

4.2.5 **Table 4-2** outlines the Applicant's conformity with the 2024 SoCC. This is a list of the commitments in the 2024 SoCC and how the Applicant has met the commitment and complied with Sections 42, 47 and 48 of the Planning Act 2008 through the delivery of the statutory Summer 2024 Consultation.



 Table 4-2
 SoCC compliance and statutory Summer 2024 Consultation delivery

Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
1 - Introduction	Paragraph 2	'This Statement of Community Consultation (SoCC) describes how we intend to carry out our statutory consultation for the Project. The statutory consultation, to run from 29 May to 23 July 2024, is an important stage of the pre-application process providing an opportunity to raise further awareness and help shape the Project prior to the submission of an application for a Development Consent Order (DCO).'	As per the requirements of the Planning Act 2008, the Applicant confirms that it held a statutory public consultation on its proposals for the Project from 29 May 2024 to 23 July 2024.
	Paragraph 4	'The Applicant has consulted with and had regard to comments from the following local authorities whilst developing the SoCC: • Winchester City Council • Eastleigh Borough Council • Fareham Borough Council • Portsmouth City Council • East Hampshire District Council • Hampshire County Council • Havant Borough Council.'	Please refer to table 4-1 . The Applicant allowed at least 28 days for local authorities and SDNPA to provide comments on the draft 2024 SoCC.



Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
3 - Planning process	Paragraph 2	'The Project is currently at the pre- application stage of the DCO process where we have a duty to, and actively want to, consult on our proposals. After the consultation is completed and having taken into account the views raised during consultation, we will refine our proposals and submit our DCO application to the Secretary of State. When submitted, the Planning Inspectorate on behalf of the Secretary of State will decide if the Project can proceed to the examination.'	The Applicant confirms that it has had regard to all feedback received at the statutory Summer 2024 Consultation. This will be demonstrated through the Consultation Report and associated appendices submitted with the DCO application. Please refer to table 4-3 for summaries of how consultation feedback is shaping the DCO application.
6 - What we will consult on	Paragraph 1	'Following the Summer 2022 Consultation, we have had regard to the feedback received to select our proposed pipeline routes and locations for the above ground plant. We now want to know what stakeholders think about the following to enable the proposals to be further shaped and refined: The Project overall The proposed pipeline routes The proposed water recycling plant and associated pumping stations	The Applicant confirms that the statutory Summer 2024 Consultation feedback form sought views on all of the topics identified in the 2024 SoCC. Additionally, the feedback form included free text areas for respondents to provide comments on any topics where a specific question was not asked. Free text responses to the statutory Summer 2024 Consultation were also accepted via email and by post, providing a



Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
		 Proposed above ground plant along the pipeline route The process undertaken to develop the Project up to this consultation The preliminary environmental and other impacts of the Project and initial proposals for mitigation. 'We will also provide information that helps explain the need for the project and the use of water recycling in providing a new source of water.' 	further opportunity for respondents to comment on all aspects of the Project.
7 - Who we will consult	Paragraph 1 and Figure 3 Consultation Zones	'In consultation with the host local authorities, and in accordance with Section 47 of the Planning Act 2008, we have developed the following consultation zones, shown in Figure 3 below, to engage with the local communities who may be affected by the Project.'	 The Applicant confirms that four consultation zones were developed for the statutory consultation stage. Consultation Zone A: comprised of affected landowners, tenants and businesses within the draft Order Limits Consultation Zone B: comprised of businesses and people living within 1km of the draft Order Limits Consultation Zone C: comprised of businesses and people living within 5km of the draft



Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
			Consultation Zone D: included Hampshire and the wider area
	Paragraph 3	'We will also consult with Statutory Consultees under the Planning Act 2008 and relevant legislation and other relevant stakeholder groups.'	The Applicant confirms that Section 42(1)(a), (aa), (b) and (d) consultees were initially issued the consultation documents by way of Royal Mail Tracked Delivery which allowed for tracking of packages and proof of delivery. The initial postal issue of consultation letters was dispatched on 23 May 2024, ahead of the start of the statutory Summer 2024 Consultation. In addition to postal copies, the Applicant also notified the majority of consultees where appropriate email addresses were available in the public domain on 29 May 2024.
			Where delivery couldn't be confirmed by the tracking service for Section 42(1)(a), (aa), and (b) consultees, the Applicant sent a further letter on 18 June 2024 where an alternative address was available. Where an alternative address was not available, an email had been previously sent. Where an alternative email was not available, these letters were then hand delivered.



Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
			Section 42(1)(c) requires consultation with the Greater London Authority. The Project is not within the Greater London and therefore the Applicant did not consult the Greater London Authority.
			The Applicant can confirm that all known Section 42(1)(d) consultees notifications were verified to be delivered by Royal Mail Tracked Delivery service ahead of the start of the consultation.
			The Applicant omitted some prescribed consultees, as set out in Schedule 1 of Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 as amended. This was corrected at the statutory Spring 2025 Consultation.
			Letters and emails sent to Section 42 consultees included the deadline by which consultation responses needed to be submitted to the Applicant of 23 July 2024 and a copy of the Section 48 notice. Examples of the correspondence sent, along with a full list of Section 42 consultees, will be provided in the



Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
			Consultation Report submitted with the DCO application.
			Pursuant to Section 46 of the Planning Act 2008, the Planning Inspectorate was notified by email on 24 May 2024, before the statutory Summer 2024 Consultation commenced, about the consultation.
8 - How we will consult	Table outlining the method, detail, and Consultation Zone	'Letters will be sent to landowners, tenants and businesses within the draft Order Limits, with information about the Project, the consultation, and how to find out more and provide feedback.'	The Applicant confirms that letters with the prescribed information were sent to addresses which included residents, landowners, tenants, and businesses in Consultation Zone A on 23 May 2024 to provide information about the Project and the consultation.
	Table outlining the method, detail, and Consultation Zone	'A leaflet summarising the Project, the consultation, and how to find out more and provide feedback will be sent.'	The Applicant confirms that leaflets in the committed form were distributed within the specified Consultation Zones A and B.
	Table outlining the method, detail, and	'Posters will be distributed with details of the Project, the consultation events, and how to find out more and provide feedback.'	Posters with details of the Project and consultation events were displayed in Consultation Zones A, B and C to raise awareness of the consultation. Locations



Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
	Consultation Zone		were identified using online mapping services in conjunction with the draft Order Limits, ensuring that posters would reach communities likely to be affected by the Project.
	Table outlining the method, detail, and Consultation Zone	'Advertisements in the Hampshire Chronicle, Hampshire Independent, Portsmouth News, and Southern Daily Echo, to notify of the consultation and provide details of consultation events and how to find out more and provide	Section 47 Planning Act 2008 notices A notice relating to where and when the published 2024 SoCC was available to be viewed was published in the following: • On 27 May 2024 in The News (Portsmouth)
	feedback.'	тееараск.	On 27 May 2024 in the Southern Daily Echo
			 On 30 May 2024 in the Hampshire Chronicle
			Section 48 Planning Act 2008 notices A Section 48 notice was published in four local newspapers for two consecutive weeks, once in a national newspaper and once in the London Gazette. These local newspapers:
			 The News (Portsmouth) published on 22 May and 31 May 2024.



Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
			Southern Daily Echo published on 22 May and 31 May 2024.
			Hampshire Chronicle published on 23 and 30 May 2024.
			 Hampshire Independent published on 24 and 31 May 2024.
			The London Gazette published on 29 May 2024
			The Times published on 5 June 2024
			Copies of Section 47 and Section 48 notices will be included in the Consultation Report which will be submitted with the DCO submission.
	Table outlining the method, detail, and Consultation Zone	'We will be using paid promotion and our own social media channels. Materials for social media will be produced and distributed to selected stakeholders who would be willing to help publicise the Project.'	The Applicant publicised details of the statutory Summer 2024 Consultation, including reminders of the timing of the consultation, via the Applicant's Facebook and Instagram accounts. The Applicant also used targeted adverts. The adverts provided a link to the website for the Project.
	Table outlining the method and detail to	'We will contribute to stakeholder briefings (including local authority and parish councils) held prior to the launch of the consultation to advise them of the	The Applicant received the following requests from stakeholders to contribute to briefings about the consultation. On 12 June 2024, the Applicant held an online





Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
	reach beyond the specific consultation zones.	consultation and how they can find out more and provide feedback. Stakeholders will also be advised of the Applicant's social media campaign and information on how to interact with its posts.'	stakeholder briefing with Havant Borough Council. The Applicant also held an online stakeholder briefing with councillors from Havant Borough Council to provide new councillors with an introduction to the Project and the consultation on the 17 June 2024. No further requests were received by the Applicant.
	Table outlining the method and detail to reach beyond the specific consultation zones.	'Notices will be posted on or near land that is identified as unknown owner.'	Site notices were printed on waterproof paper and erected in publicly accessible areas nearest to the relevant unregistered parcel to ensure the highest visibility to the public. These were erected, monitored and replaced bi-weekly over an 8-week period starting 28 May 2024 and ending 26 July 2024.
	Table outlining the method and detail to reach beyond the specific	'We will send an email to all registered users of the Water for Life – Hampshire website and respondents to the previous consultation that wished to stay in touch. This will signpost to key information and will include a link to the consultation website,	An email was sent to members of the wider community who had previously provided email contact details and expressed an interest to be kept informed about updates regarding the Project. The email included details of the statutory Summer 2024 Consultation and how to take part.



Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
	consultation zones.	details of the consultation events, and how to find out more and provide feedback.'	
	Table outlining the method and detail to reach beyond the specific consultation zones.	'A Project website will be the digital hub for the consultation and will include the consultation materials, options to feedback virtually and to request further information or accessible versions of consultation.'	The Applicant developed a dedicated consultation website which also hosted an interactive map. Users could search their postcode and view on the map how the Project may impact them. All consultation documents where available to view/download within the document library. The documents were in PDF format which facilitated online viewing and downloads. The website also hosted an online feedback form which was situated on the home page for easy access. In addition, the website had a side bar which adapted the website based on accessibility requirements.
	Table outlining the method and detail to reach beyond the specific consultation zones.	'The consultation brochure, feedback form and technical information pack will be available for people to view at deposit locations in local and regional hubs.'	The statutory Summer 2024 Consultation documents which included all the committed elements were available for inspection, with some materials available to take away, at the below locations, from 29 May to 23 July 2024.



Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
			Bishop's Waltham Library, Free Street, Bishop's Waltham, Southampton, SO32 1EE
			Cosham Library, Spur Road, Cosham, Portsmouth, PO6 3EB
			 Eastleigh Library, 1 Swan Centre, Eastleigh, SO50 5SF
			 Fair Oak Community Library, Campbell Way, Fair Oak, Eastleigh, SO50 7AX
			 Fareham Library, Osborn Road, Fareham, PO16 7EN
			 Havant Library, Havant Meridian Centre, Havant, PO9 1UN
			 Leigh Park Library, 50 Park Parade, Leigh Park, Havant, PO9 1UN
			 Paulsgrove Library, Paulsgrove Youth Community Centre, Marsden Road, Portsmouth, PO6 4JB
			Waterlooville Library, The Precinct, Waterlooville, PO7 7DT
	Table outlining the method and	'We will run a series of six public consultation events to provide information on the consultation and give people the	The Applicant confirms that it held six consultation events to provide information on the consultation including the



2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
	detail to reach beyond the specific consultation zones.	opportunity to talk to the Project team. These will include exhibition boards describing the Project and members of the Project Team will be on-hand to answer questions. Visitors will be encouraged to ask questions to aid their understanding, complete/take away feedback forms and the consultation brochure.'	 consultation brochure, make feedback forms available and give people an opportunity to talk to the Project team with details below: From 2pm to 8pm on Monday 10 June 2024 at Havant Rugby Football Club, Hooks Lane Ground, Fraser Road, Havant, PO9 3EJ. 110 persons attended. From 10am to 4pm on Saturday 15 June 2024 at Meridian Shopping Centre, Elm Lane, Havant. PO9 1UN. 285 persons attended. From 2pm to 8pm on 20 June 2024 at Southwick D-Day Memorial Hall, Priory Road, Southwick. PO17 6ED. 42 persons attended. From 10am to 4pm on 22 June 2024 at Jubilee Hall, Little Shore Lane, Bishops Waltham. SO32 1ED. 80 persons attended. From 2pm to 8pm on 27 June 2024 at Colden Common Community Centre, Saint Vigor Way, Colden Common. SO21 1UU. 138 persons attended. From 2pm to 8pm on 28 June 2024 at Wickham Community Centre, Mill Lane,



Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
			Wickham. PO17 5AL. 114 persons attended.
	Table outlining the method and detail to reach beyond the specific consultation zones.	'Within the consultation period, we will offer to present at meetings where local organisations already meet and a request is made (for example but not limited to parish councils, community groups, education establishments, businesses, recreational groups, non-government organisations, seldom heard and hard to reach groups). Where required and feasible we may combine requests for briefings. For those that would like a session with us please email Hampshirewtwn.co.uk southernwater.co.uk'	The Applicant confirms that it held an online stakeholder briefing with Havant Borough Council on 12 June 2024. Havant Borough Council were the only local organisation that requested a briefing, despite all local authorities being offered. The Applicant also held an online stakeholder briefing with councillors from Havant Borough Council to provide new councillors with an introduction to the Project and the consultation on 17 June 2025. The Applicant did not receive any requests for a briefing via the dedicated consultation
	Consultation documents	'To ensure accessibility (including seldom heard and hard to reach groups), on request, documents can also be translated, made available in large print, audio versions, braille and in a digital data format. In addition, hard copies of consultation documents can be provided. Please see	Before the consultation launched, the Applicant consulted a supplier who could produce the consultation materials in an accessible format on request. For example, documents could be translated, made available in large print, audio version, and braille. The Applicant received no requests



Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
		contact us section for our contact details to request these methods.'	via its freephone or inboxes for alternative formats during the consultation but was prepared to do so, if any request had come in.
			A range of approaches and media to maximise awareness of the Project and the consultation were used. These were designed to allow people with different needs across the community to take part in the consultation in a way that was accessible and convenient for them.
			In addition, the Applicant noted in its consultation brochure that those who required additional support to attend the public consultation events could contact the Applicant ahead of any of these events to make specific arrangements to attend or whilst they were in attendance at the events, if required. The Applicant affirmed that while it would make every possible effort to accommodate additional support, it may not have been possible for all. However, no requests were made that the Applicant was not able to accommodate.



Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
			The consultation brochure outlined accessibility features, also described in the Equality Impact Assessment to be submitted with the DCO application, for each of the consultation venues so the wider community could pick a venue which met their accessibility requirements.
	Consultation materials	'One copy of the consultation brochure and feedback form is free. We are keen to reduce the impact on the environment by reducing unnecessary printing and minimising paper use. The Preliminary Environmental Information Report is around 6,000 pages.'	The Applicant confirms that copies of the feedback form, alongside other consultation materials, were available at consultation events and deposit locations to take away free of charge.
			The Applicant also noted in its Consultation Brochure that anyone could request a copy of the brochure, or any other consultation materials, in alternative formats free of charge by contacting the Applicant directly.
	Consultation documents	'The following consultation documents (together with other supporting material) will be available for viewing online, at deposit locations and at the public consultation events free of charge during the consultation:	The Applicant confirms that all consultation materials were produced with print copies available to view free of charge at deposit locations throughout the consultation, and at events. The consultation brochure and the feedback form could be taken away or one copy could be sent per household in the



Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
		Consultation brochure — a plain English and visually accessible booklet that provides the key information about the proposals, the consultation and how to get involved. Feedback form — a survey designed to collect feedback on the proposals Frequently Asked Questions — a document answering a range of questions about the Project serving as a one-stop reference point for concerns and providing signposts to further information should it be required SoCC — this document Preliminary Environmental Information Report — report to enable consultees (both specialist and non-specialist) to understand the likely environmental effects of the Project that have been identified on a preliminary basis Preliminary Environmental Information Report Non-Technical Summary — a summary of the Preliminary Environmental Information Report 2024 Scheme Development Summary — a summary of how the Project has developed	post upon request. All materials were available online. The opening hours for eight of the deposit locations were corrected in the 2024 SoCC, both on the online and hard copy versions held at the deposit locations on 13 June 2024. During the consultation, the Applicant was made aware that the appendices for Chapter 20 of the PEI Report had been incorrectly uploaded to the consultation website. These were Appendix 20.1 (Longlist and shortlist of other developments) and Appendix 20.2 (Cumulative effects assessment). They were uploaded correctly on 10 June 2024 to the consultation website and rectified at deposit locations on 18 June and 19 June 2024. The figures to Appendix 11.1 (Geotechnical and Geo-Environmental Desk Study) of the PEI Report were missing from the consultation website. This appendix was uploaded on 18 June 2024 and corrected at deposit locations.



Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
		to date, including refinements made following the Summer 2022 Consultation Book of Plans – plans of the proposed pipeline routes and above ground plant.'	An update was made to the consultation brochure about Environment Agency Licensing. A revised consultation brochure was uploaded to the website on 26 June 2024 and a clarification note added on 28 June 2024. Question 3 in the Frequently Asked Questions was about the Applicant's agreement with the Environment Agency. This document was therefore also updated to provide clarity on 4 July 2025. Hard copies at deposit locations were updated on 5 July 2024.
10. How the community can provide comments	Second section	'The following official feedback mechanisms will be provided as part of the consultation: Online feedback form Email FREEPOST address QR code to website'	The Applicant confirms that feedback was accepted via the channels outlined in the 2024 SoCC within the statutory consultation period.
11. How we will respond to feedback	Paragraph 1	'Once the consultation has closed, we will collate and analyse the responses received. We will carefully consider all issues raised and will have regard to this feedback when finalising the proposed application.'	The Applicant confirms that all consultation responses provided in the consultation period were collated and analysed. Consideration has been given to these responses following the close of the statutory consultation and the Applicant will





Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
			have regard to feedback as per Section 49 of the Planning Act 2008. As a result of this feedback, along with the results of technical and environmental assessments, and ongoing evolution of the Project, the Applicant subsequently made 25 design refinements.
			The Applicant held a further supplementary consultation with updated water quality information and the 25 design refinements.
	Paragraph 2	'As part of the DCO application we will publish a Consultation Report, detailing how we have engaged and consulted on the Project, whilst adhering to legislation and guidance and reporting on the issues raised in the consultation and our response to them. In having regard to feedback and refining our proposals, it may be necessary to make further changes to the proposed Project following the statutory consultation process.'	The Applicant confirms that the Consultation Report will be available on the Planning Inspectorate's website once the application for development consent has been submitted and accepted. The Consultation Report will set out how the Applicant has had regard to feedback in accordance with Section 49 of the Planning Act 2008.
	Paragraph 3	'Any comments received will be analysed by the Applicant and any of its appointed agents. Copies may be made available in	The Applicant confirms that feedback will be analysed and summarised in the form of issue statements where feedback has been



Section of 2024 SoCC	Paragraph of 2024 SoCC	Commitment as set out in the 2024 SoCC	How the Applicant has fulfilled the commitment
		due course to the Secretary of State, the Planning Inspectorate and other relevant statutory authorities so that your responses can be considered as part of the development of the Project. Your personal details will not be placed on public record except where this is required in accordance with legislation or legal duty such as land referencing, but will be held securely by the Applicant and its appointed agents in accordance with the General Data Protection Regulation (GDPR), the Planning Inspectorate's Customer Privacy Notice 8 and the Data Protection Act 2018. Personal details will be used solely in connection with the consenting and regulatory processes, except as noted above, or in accordance with any legal requirements or process, and will not be passed to third parties.'	paraphrased. It is also confirmed that no personal information will be included within the Consultation Report, which will be submitted with the DCO application. The Applicant is compliant with guidance on data protection as listed in the 2024 SoCC.



4.3 Consideration of feedback

4.3.1 A total of 985 relevant responses were submitted to the Applicant, this included 597 feedback forms, 385 emails and 3 letters. That number includes responses received after the deadline, which were accepted by the Applicant on a discretionary basis, with the latest being the 26 July 2024. **Graphic 4-1** outlines the key statistics from the statutory Summer 2024 Consultation.

Graphic 4-2 Statistics from the statutory Summer 2024 Consultation





Event		Attendees
Monday 10 June	Havant Rugby Football Club, Hooks Lane Ground, Fraser Road, Havant, Hampshire, PO9 3EJ	110
Saturday 15 June	Meridian Shopping Centre, Elm Lane, Havant, PO9 1UN	285
Thursday 20 June	Southwick D-Day Memorial Hall, Priory Road, Southwick, PO17 6ED	42
Saturday 22 June	Jubilee Hall, Little Shore Lane, Bishop's Waltham, SO32 1ED	80
Thursday 27 June	Colden Common Community Centre, Saint Vigor Way, Colden Common, SO21 1UU	138
Friday 28 June	Wickham Community Centre, Mill Lane, Wickham, PO17 5AL	114



	0.3%	5.3%	11.8%	15.5%	22.4%	24.2%	12.7%	7.8%	
Prefer not to say		0	0	2	0	3		0	4.79
Other		2	0	0	0	0		3	2.8
Male		10	14	20	38	37	25	7	46.9
Female	0	4	22	27	32	37	16	8	45.7
Age Group	16-24	25-34	35-44	45-54	55-64	65-74	75 or over	Prefer not to say	

4.3.2 **Table 4-3** below provides a summary of the feedback themes that have been identified throughout the statutory Summer 2024 Consultation and how these responses are shaping the Applicant's final proposals.

46

Document Code: 710166-SWS-XX-XX-RP-EN-



Table 4-3 Summary of issues raised at statutory Summer 2024 Consultation and how they are shaping the application

consultation and now they are shaping the application			
Issue raised at consultation	How consultation responses are shaping the application		
The Applicant received feedback regarding potential impacts on the environment resulting from both construction and operation of the Project.	Construction and operational impacts are something that the Applicant is considering throughout each stage of the Project and will therefore be reported on in all topic chapters of the Environmental Statement. Consultation feedback continues to result in the Applicant making refinements to the Project and how it is constructed, such as through changes to the pipeline routes to avoid environmental features, and to measures contained in the Outline Construction Environmental Management Plan (CEMP) which seeks to avoid, reduce and mitigate construction impacts.		
	Since the statutory Summer 2024 Consultation, the Applicant has produced an Outline Operational Management Plan and Outline Landscape and Ecological Management Plan which aim to avoid, reduce and reduce impacts during operation.		
The Applicant received feedback suggesting that the Project was an unsustainable option to build and operate in terms of energy.	The Applicant has confirmed that the Options Appraisal Process carried out in 2021 confirmed the Project as the most sustainable solution and that the Project continues to be selected in the Applicant's final draft WRMP24 as the only feasible solution to address the water supply challenge in Hampshire. The energy use of the Project was considered in the Options Appraisal Process. Various strategies, assessments and management plans detailed as part of the DCO will consider how the Project can be developed and delivered as sustainably as reasonably practicable.		
The Applicant received feedback surrounding the potential health impacts of drinking recycled water.	The Applicant continues to provide assurance around the efficacy of the water recycling process and the fact that water going into supply will continue to meet strict regulatory standards on drinking water quality. These standards are regulated and overseen by the Drinking Water Inspectorate. The Applicant		



Issue raised at consultation	How consultation responses are shaping the application
	has also undertaken engagement with relevant stakeholders as part of the Water Recycling Pilot Plant, with a particular focus on those based in the Havant area, and carried out a subsequent consultation on environmental water quality, feedback from which continues to inform the development of the Applicant's assessments and mitigation.
The Applicant received feedback about the Above Ground Plant due to potential negative environmental effects.	In developing the Project design, the Applicant has sought to reduce the potential impacts of Above Ground Plant, with design refinements made and presented as part of the statutory Spring 2025 Consultation. Solutions to address this feedback are in the form of landscape screening and planting, for example to reduce potential landscape and visual impacts. These will all be reported on in the Design Principles Document to be submitted with the DCO application. The Applicant has carried out extensive engagement with local authorities on the emerging design principles that will be set out in this document.
The Applicant received feedback about the prolonged negative effects of construction traffic on transport, for example congestion.	Throughout Project development, the Applicant has looked to avoid and reduce construction traffic impacts, for example by using trenchless crossings for main roads and reducing use of roads for the pipeline route. The Applicant has also confirmed that various measures will be proposed through the DCO process to control construction traffic operations in order to further reduce potential impacts on the road network and road users. Outline traffic management plans are also being prepared that will accompany the DCO application.
The Applicant received feedback around the noise and vibration impacts of construction and operation.	The Applicant acknowledges this feedback surrounding noise and vibration from construction and operation and continues to refine the pipeline route and Above Ground Plant works to avoid and reduce noise and vibration impacts, with management plans



Issue raised at consultation	How consultation responses are shaping the application
	being developed to further control potential impacts through construction and operation.
The Applicant received feedback noting that the narrow nature of some roads could restrict the flow of traffic, particularly if construction vehicles are unable to pass in locations such as Portchester Lane, White Dell Lane, and Scivier's Lane.	Where there are narrow roads that are not wide enough for two HGVs to pass, the Applicant has added measures to the Outline Construction Traffic Management Plan to ensure that deliveries would be coordinated to avoid a scenario where two HGVs would need to pass. In relation to the identified locations, construction compound access proposals have been refined so that HGVs would not need to route along those narrow roads. Instead, the relevant construction compounds would be accessed via the haul road and appropriate or wider roads on the local highway network.
The Applicant received feedback around the possible disturbance to local wildlife and environmentally sensitive areas.	The Applicant has sought to avoid and reduce impacts on biodiversity throughout the development of the Project. The Applicant continues to, where practicable, avoid ancient woodland, designated sites and known ecological features. Feedback has also informed the use of trenchless crossings and reduced working width locations during construction and the subsequent development of appropriate measures in management plans that will be submitted as part of the DCO application.
The Applicant received feedback around possible disturbance to the historic and cultural environment.	Since the statutory Summer 2024 Consultation, the design principles of Above Ground Plant and Environmental Mitigation and Enhancement Areas have been further developed with respect to heritage assets. An Outline Written Scheme of Investigation relevant to archaeological remains and geoarchaeological deposits has also been further developed. The assessment is being carried out in line with appropriate good practice professional guidance. Where likely significant effects are being identified, the Applicant is looking for ways to avoid or reduce them. Where mitigation is required, the Applicant is developing an Outline Written



Issue raised at consultation	How consultation responses are shaping the application
	Scheme of Investigation and has engaged with Historic England, Winchester County Council and Hampshire County Council on this.
The Applicant received feedback about the effects of air quality and odour from the Project and existing infrastructure.	The Applicant acknowledges this feedback surrounding air quality and odour, which will be comprehensively assessed in Environmental Statement Chapter 6 Air Quality and Odour. Regarding the methodology for the air quality assessment, the Applicant originally proposed to use the Joint Nature Conservation Committee approach (and used this for the PEI Report). Following comments from Natural England during the statutory Summer 2024 Consultation, the Applicant updated the air quality assessment approach and is using Natural England's NEA001 guidance.
	The Outline CEMP will contain measures to reduce emissions of dust and odour during construction activities, as well as exhaust pollutants from Non-Road Mobile Machinery and road vehicles, including proposed emissions standards for construction road vehicles. Air quality and odour impacts are not expected to occur during the operational phase of the Project.
The Applicant received feedback regarding the level of detail of the environmental assessments.	The Environmental Impact Assessment (EIA) process for projects consented under the Planning Act 2008, such as the Project, follow a process whereby the environmental information and assessment develops as the design evolves. The PEI Report, published as part of the statutory Summer 2024 Consultation materials, provided the preliminary environmental information and the potential likely significant effects based on the information at that point in time. Following the statutory Summer 2024 Consultation, additional work has been undertaken on collecting and updating baseline and survey data, modelling, and refining the environmental assessments. This work has

WATER for LIFE from Southern Water

Issue raised at consultation	How consultation responses are shaping the application
	been used to inform not only the assessment of likely significant effects that will be presented in the Environmental Statement, but also the ongoing iterative refinement of the Project design.
The Applicant received feedback around the Project implications in terms of carbon emissions and climate change.	Since the statutory Summer 2024 Consultation, the Applicant has developed and prepared the Outline Carbon Management Plan which will set out measures being embedded into the Project to reduce carbon. The Outline Carbon Management Plan will be submitted as part of the DCO application.
The Applicant received feedback about the water quality at Havant Thicket Reservoir when used to store the recycled water.	The Applicant acknowledges this feedback and undertook additional engagement as part of the statutory Spring 2025 Consultation on environmental water quality to update and seek feedback on its latest water quality modelling work. The Applicant continues to have regard to this and subsequent feedback as it finalises its assessments and mitigation proposals, which will reported in the Environmental Statement.
The Applicant received feedback surrounding possible malfunctions at the Water Recycling Plant and how it would affect the water quality in Havant Thicket Reservoir.	The Applicant has sought to provide assurances that appropriate measures and controls would be put in place to prevent possible malfunctions of the treatment process impacting on the reservoir and wider environment. The multi-stage water recycling process will feature numerous safeguards, including continuous monitoring, to ensure that significant deviations in expected water quality can be quickly spotted and rectified through partial of full system shutdowns. It will not be possible for treated wastewater to bypass this process and enter Havant Thicket Reservoir. These safeguards will be implemented by the Contractor appointed to construct and operate the Water Recycling Plant and will be a key specification for the plant to ensure water quality requirements will be met.



Issue raised at consultation	How consultation responses are shaping the application
The Applicant received feedback around the Project possibly resulting in changes to the quality of releases from the existing Eastney Long Sea Outfall and therefore affecting coastal waters.	The Applicant recognises this feedback surrounding water quality from releases from the Long Sea Outfall. Updated environmental information, supplementary to that presented in the PEI Report, was presented as part of the Applicant's statutory Spring 2025 Consultation. This included more detailed quantitative information to reflect the latest environmental water quality modelling work. This confirmed that water quality impacts are not expected from releases from the Long Sea Outfall as a result of the Project.
The Applicant received feedback from landowners around impacts to farming and the land that would be disrupted during building and operation.	Ongoing Project design development has looked to refine the pipeline route to reduce impacts on land use and agriculture. There is also ongoing engagement with landowners to better understand the extent and nature of land holdings, scale and seasonality of agricultural operations. No farm viability issues are currently envisaged that will not be resolved through ongoing discussion.
The Applicant received feedback from landowners around the proposed 40-metre width of the working corridor needed for pipeline installation.	The Applicant has made clear that a 40 metre working width is necessary for the open-cut construction of the pipeline, but in response to feedback, has investigated where the working width can be reduced to 20 metres, where possible in limited circumstances, to address environmental and other constraints.
The Applicant received feedback regarding access to the working corridor and how it would be managed in order to minimise impacts and ensure security is maintained.	The Applicant has confirmed that crossing points and site accesses would be locked to maintain safety and security during the construction process. Further measures will be detailed in the various management plans that will support the DCO to control activities during the construction process in order to reduce impacts.
The Applicant received feedback around the use of chemicals in the water recycling process and controls needing to be put in place to ensure no contaminated water enters Havant Thicket	The Applicant outlined at the statutory Summer 2024 Consultation that chemicals would be used and stored as part the Project, specifically for the water recycling process, and that the use and storage of chemicals



Issue raised at consultation	How consultation responses are shaping the application
Reservoir. The feedback was as a result of scepticism	would meet relevant safety and regulatory requirements as necessary.
around the proposed use of water recycling technology in the UK.	The Applicant has also sought to provide assurance around the quality of the recycled water entering Havant Thicket Reservoir by consulting on updated water quality assessment work in Spring 2025, noting that water quality would be required to meet relevant regulations as part of the consenting process but also standards specified by the Environment Agency as part of a discharge permit for the reservoir.
	The multi-stage water recycling process will also feature numerous safeguards, including continuous monitoring, to ensure that significant deviations in expected water quality can be quickly spotted and rectified through partial of full system shutdowns. It will not be possible for treated wastewater to bypass this process and enter the reservoir. These safeguards will be implemented by the Contractor appointed to construct and operate the Water Recycling Plant and will be a key specification for the plant to ensure water quality requirements will be met.
The Applicant received feedback from landowners who were affected by the proposed pipeline routes.	As well as the ongoing landowner engagement, the Applicant consulted on a preferred pipeline corridor in non-statutory Summer 2022 Consultation and proposed pipeline routes at statutory Summer 2024 Consultation, together with further design refinements in the statutory Spring 2025 Consultation. Throughout the development of the Project, the Applicant has taken landowner feedback on board and, where reasonably practicable, adjusted the design of the Project to address issues raised.
The Applicant received feedback around wanting more information on how excavated landfill waste would be dealt with, the proposed measures to prevent potential	The Applicant is confident that appropriate construction methods and practices will be employed for effective handling of landfill waste and construction within the historic landfill.



Issue raised at consultation	How consultation responses are shaping the application
disturbance of contamination within the landfill at the proposed Water Recycling Plant site (Site 72), and the responsibility for dealing with any potential contamination.	Engagement continues with Havant Borough Council and the Environment Agency to ensure that risks and significant likely impacts are avoided or reduced with appropriate controls put in place.
The Applicant received feedback around the cost to the customer to build and operate the Project.	The Applicant has made clear throughout its consultations that the Options Appraisal Process undertaken in 2021 to select the Project confirmed it as the most sustainable and best value solution and that the project continues to be selected in the Applicant's final draft WRMP24 for delivery at the earliest opportunity. The development and progression of this Project has been overseen and supported by the Applicant's regulators.
The Applicant received feedback about consultees feeling misled about the plans for Havant Thicket Reservoir and its intended use.	The Applicant affirms that it has always been open and transparent about the options it has considered to address the water supply deficit in Hampshire, including the use of Havant Thicket Reservoir. The options to utilise Havant Thicket Reservoir were communicated at the time the planning application for Havant Thicket Reservoir was being considered and during the Applicant's non-statutory Public Consultation in 2021.
The Applicant received feedback about how much water is currently lost to leaks, which according to consultees would resolve the shortfall.	Leakage is a challenge across the water industry, and the Applicant is one of the better performing companies with regards to its leakage performance, committing to reduce leakage by 53% by 2025.
	Given the size of the water supply shortfall faced in Hampshire, finding and fixing all leaks across the county, and the rest of the Applicant's supply area, would only provide around half of the water needed and not within the timescale required. The Applicant has always been clear that reducing leakage is an important part of reducing the shortfall as part of a suite of solutions, including the development of large new sources of water, such as this Project.



Issue raised at consultation	How consultation responses are shaping the application
The Applicant received feedback around alternatives to water recycling like rainwater capture.	After developing and consulting on WRMP19 and the final draft WRMP24, the Applicant continues to outline that alternatives like rainwater capture simply are not enough to cover the shortfall that is needed to address the water supply shortfall in Hampshire.

4.4 Summary

- 4.4.1 On 28 January 2025, the Applicant published a Summer 2024 Consultation Summary of Feedback Report which provides a summary of the consultation activities, an overview of the main themes that emerged from the consultation responses, and an explanation of how the Applicant had been considering the issues raised in the development of the Project.
- 4.4.2 The Applicant is actively addressing the feedback by continuing to refine the pipeline routes to reduce disruption and avoid sensitive areas, and is committed to developing design principles in collaboration with local authorities to ensure good design. Changes to the design of the Project arose in response to consultation feedback, but also from on-going technical work and environmental surveys. The Applicant consulted on several of these design refinements at the statutory Spring 2025 Consultation.
- 4.4.3 The use of Havant Thicket Reservoir for the storage of recycled water was one of the most commented on themes. This prompted the decision to consult on updated water quality information as part of the statutory Spring 2025 Consultation.



5 Statutory Spring 2025 Consultation

5.1 Approach

- 5.1.1 At the statutory Summer 2024 Consultation, the Applicant explained that extensive water quality modelling was being undertaken and that the outputs of the modelling and assessment of effects would be fully reported in the Environmental Statement with the DCO application. The Applicant subsequently took the opportunity to consult on the progress of this modelling and assessment work, alongside a number of design refinements, as part of its statutory Spring 2025 Consultation.
- 5.1.2 Specifically, our statutory Spring 2025 Consultation focused on:
 - Predicted water quality impacts on the Havant Thicket Reservoir, connected downstream water bodies (including Riders Lane Stream, Hermitage Stream, and Langstone Harbour), and the Solent.
 - Proposed refinements to the design of the Project that take into account feedback from the statutory Summer 2024 Consultation and on-going project development and stakeholder engagement.
- 5.1.3 The Applicant drafted an 'Approach to Consultation' document. The purpose of this document was to set out how and when the consultation would be held, the information that would be included in the consultation, who would be consulted, and the approach and tools that would be used to reach consultees and gather views. A further SoCC was not required because the 2024 SoCC published at statutory Summer 2024 Consultation stated 'If we deem a significant change is made to the Project as a whole, or new statutory consultees are affected, we will consider further targeted and proportionate consultation beyond what is specified in this document, to help inform the final design of the Project. If further consultation is carried out, we will provide appropriate notification to relevant stakeholders who may be affected by the change(s) in question.'
- 5.1.4 Although not a statutory requirement, the Applicant consulted on the proposed approach with local authorities as set out in the Approach to Consultation prior to the launch of statutory Spring 2025 Consultation.
- 5.1.5 The timeline in **table 5-1** below details how the Approach to Consultation document was delivered, including the consultation on the Approach to Consultation document with local authorities and South Downs National Park Authority (SDNPA), and when the document was finalised and made available to view.

56

Table 5-1 Approach to Consultation delivery timetable

Description	Date	Detail
Start of consultation on the draft Approach to Consultation	18 February 2025	Draft Approach to Consultation document issued to local authorities consulted on the 2024 SoCC, and SDNPA for comment. Feedback was requested by 25 February 2025.

Document Code: 710166-SWS-XX-XX-RP-EN-

00049



Description	Date	Detail
document with local authorities		
Joint Officer Group Meeting at the end of consultation on the draft Approach to Consultation document with local authorities	25 February 2025	The Applicant further briefed local authorities and SDNPA on the approach in a Joint Officer Group Meeting. Feedback on the approach was received verbally, and in writing via email.
Finalised Approach to Consultation document shared with local authorities	3 March 2025	Queries made during the consultation by local authorities were answered in a Microsoft Excel tracker by the Applicant. The only queries were the request for a possible consultation period extension, commenting on the risk of not holding any in-person events and whether the consultation documents would be available to local authorities and SDNPA before launch. As all questions were answered in the tracker to the satisfaction of the local authorities, no changes to the Applicant's approach to the consultation were required. The Applicant distributed the finalised Approach to Consultation document to the local authorities and SDNPA, outlining that the document would be published alongside the other consultation documents at consultation launch on the 5 March 2025 at https://www.hampshirewtwrp.co.uk
Publication of Approach to Consultation document	5 March 2025	The Approach to Consultation document was uploaded, alongside other consultation materials, to the Applicant's consultation website.

5.2 Delivery of the Statutory Spring 2025 Consultation

- 5.2.1 The Applicant undertook a four-week, statutory consultation on the Project, which was in line with Sections 42, 45, 46, 47 and 48 of the Planning Act 2008. The statutory Spring 2025 Consultation took place between 5 March 2025 and 4 April 2025.
- 5.2.2 **Table 5-2** outlines the Applicant's conformity with the Approach to Consultation. This is a list of the commitments made in the Approach to Consultation and how the Applicant has met the commitment and complied with Sections 42, 47 and 48 of the Planning Act 2008.

57



 Table 5-2
 Approach to Consultation compliance

Section of Approach to Consultation document	Paragraph of Approach to Consultation document	Commitment as set out in the Approach to Consultation document	How the Applicant has fulfilled the commitment
2 – Spring 2025 Consultation	Paragraph 1	'Responses to consultation will then be used to inform ongoing development and assessment of the Project as it progresses along the consenting timetable.'	The Applicant confirms that regard will be had to all feedback received at the statutory Spring 2025 Consultation. This will be demonstrated through the Consultation Report and associated appendices submitted with the DCO application.
2.1 – Who we will consult	Paragraph 1	 'We have developed the Spring 2025 Consultation zones to engage with the local communities who may be affected by the Project. The Spring 2025 Consultation zones are: 'Zone A – Draft Order Limits (dOL) 'Zone B – Generally 250m from the dOL 'Zone C – 5km from dOL 'Zone D – Hampshire and the wider area (with an emphasis on the south and coastal region)' 	 The Applicant confirms that four consultation zones were developed for the statutory consultation stage. Consultation Zone A: comprised of affected landowners, tenants and businesses within the dOL Consultation Zone B: comprised of businesses and people living within 250m of the dOL Consultation Zone C: comprised of businesses and people living within 5km of the dOL Consultation Zone D: included Hampshire and the wider area



Section of Approach to Consultation document	Paragraph of Approach to Consultation document	Commitment as set out in the Approach to Consultation document	How the Applicant has fulfilled the commitment
	Paragraph 2	'In accordance with the SoCC, we will also consult with Statutory Consultees under the Planning Act 2008 and relevant legislation and other relevant stakeholder groups.'	The Applicant confirms that Section 42(1)(a), (aa), (b) and (d) consultees were initially issued the consultation documents by way of Royal Mail Tracked Delivery which allowed for tracking of packages and proof of delivery. The initial postal issue of consultation letters was dispatched on 27 February 2025, ahead of the start of the statutory Spring 2025 Consultation. In addition to postal copies, the Applicant also notified the majority of consultees where appropriate email addresses were available in the public domain on 4 March 2025. Where delivery couldn't be confirmed by the tracking service for Section 42(1)(a), (aa), and (b) consultees, the Applicant sent a further letter on 5 March 2025. Where delivery could not be confirmed a second time, the Applicant further emailed requesting the consultee to confirm the notification had been delivered but received no confirmation. Where an alternative email was not available, these letters were then hand delivered.



Section of Approach to Consultation document	Paragraph of Approach to Consultation document	Commitment as set out in the Approach to Consultation document	How the Applicant has fulfilled the commitment
			The Applicant can confirm that all known Section 42(1) (d) consultee notifications were verified to be delivered by Royal Mail Tracked Delivery service ahead of the start of the consultation.
			At the statutory Summer 2024 Consultation, the Applicant omitted some prescribed consultees, as set out in Schedule 1 of Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 as amended. This was corrected at the statutory Spring 2025 Consultation where the Applicant consulted these consultees on both the statutory Summer 2024 Consultation, and the statutory Spring 2025 Consultation. Consultees were given at least 28 days to comment.
			Letters and emails sent to Section 42 consultees included the deadline by which consultation responses needed to be submitted to the Applicant of 4 April 2025 and a copy of the Section 48 notice. Examples of the correspondence sent,





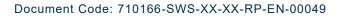
Section of Approach to Consultation document	Paragraph of Approach to Consultation document	Commitment as set out in the Approach to Consultation document	How the Applicant has fulfilled the commitment
			along with a full list of Section 42 consultees, will be provided in the Consultation Report submitted with the DCO application.
			Pursuant to Section 46 of the Planning Act 2008, the Planning Inspectorate was notified by email on 5 March 2025 about the statutory Spring 2025 Consultation.
2.2 – How we will consult	Paragraph 1	'The Spring 2025 Consultation will be a "digital first" consultation meaning that the consultation information will be available to view online.'	The Applicant confirms that all the information was made available on its consultation website on 5 March 2025 in the document library at https://www.hampshirewtwrp.co.uk/index.ht ml
2.2 – How we will consult	Table outlining the method, detail, and Consultation Zone	'Letters will be sent to landowners, tenants and businesses within the draft Order Limits, with information about the Project, the consultation, how to find out more and how to provide feedback.'	The Applicant confirms that letters were sent to addresses which included residents, landowners, tenants, and businesses in Consultation Zone A on 26 February 2025 to inform of the consultation.
	Table outlining the method, detail, and	'Notices will be posted on or near land within the draft Order Limits that is identified as unknown owner.'	Site notices were printed on waterproof paper and erected in publicly accessible areas nearest to the relevant unregistered



Section of Approach to Consultation document	Paragraph of Approach to Consultation document	Commitment as set out in the Approach to Consultation document	How the Applicant has fulfilled the commitment
	Consultation Zone		parcel to ensure the highest visibility to the public. These were erected, monitored and replaced weekly over a 6-week period starting 27 February 2025 and ending 07 April 2025.
	Table outlining the method, detail, and Consultation Zone	'Postcards will be sent to all properties with postcodes broadly within a 250m buffer of the dOLs with information about the Project, the consultation, how to find out more and how to provide feedback.'	The Applicant confirms that postcards with information about the Project, the consultation, how to find out more and how to provide feedback were sent on 27 February 2025 to properties and businesses in Consultation Zones A and B.
	Table outlining the method, detail, and Consultation Zone	'Posters will be distributed both digitally to some for their own issuing and physically where this cannot happen. These posters will contain details of the consultation, and to find out more and how to provide feedback. We will distribute these to the external border of consultation Zone C which covers a 5km radius of the pipeline. We will aim to distribute over 100 posters to places like community hotspots, points of interest for seldom-heard groups and green	Posters were displayed in Consultation Zones A, B and C to raise awareness of the consultation. Locations were identified using online mapping services in conjunction with the draft Order Limits, ensuring that posters would reach communities likely to be affected by the Project. The Applicant distributed approximately 50 posters.



Section of Approach to Consultation document	Paragraph of Approach to Consultation document	Commitment as set out in the Approach to Consultation document	How the Applicant has fulfilled the commitment
		spaces in order to achieve good consultation promotion.'	
	Table outlining the method, detail, and Consultation Zone	'Advertisements in the Hampshire Chronicle, Southern Daily Echo, and The News (Portsmouth), to notify of the consultation and provide details of how to find out more and provide feedback.'	 The Applicant confirms that adverts were published by the three local newspapers, reaching all four Consultation Zones. The Hampshire Chronicle published on 6 March and 13 March 2025 The Southampton Southern Echo published on 5 March and 12 March 2025 The News (Portsmouth) published on 5 March and 12 March 2025
	Table outlining the method, detail, and Consultation Zone	'We will be promoting the consultation on social media channels.'	The Applicant publicised details of the statutory Spring 2025 Consultation, including reminders of the timing of the consultation, via the Applicant's Facebook and Instagram accounts. The adverts provided a link to the website for the Project. This social media reached all four Consultation Zones
	Table outlining the method, detail, and	'Notices as required under Section 48 of the Planning Act 2008, in the Hampshire Chronicle, The Times, The London Gazette, The News	The Applicant confirms that all Section 48 notices were published by the recorded outlets, reaching all four Consultation Zones.





Section of Approach to Consultation document	Paragraph of Approach to Consultation document	Commitment as set out in the Approach to Consultation document	How the Applicant has fulfilled the commitment
	Consultation Zone	(Portsmouth) and the Hampshire Independent to notify of the consultation and provide details of how to find out more and provide feedback.'	 The Hampshire Chronicle published on 20 and 27 February 2025. The Times published on 4 March 2025. The London Gazette published on 4 March 2025. The News (Portsmouth) published on 25 February and 4 March 2025. The Hampshire Independent published on the 28 February 2025. Copies of these Section 48 notices will be included in the Consultation Report which will be submitted with the DCO submission.
	Table outline Method and Detail	'Emails (or letters where requested) will be sent to all prescribed and non-prescribed consultees, and members of the public that filled in keep in touch cards with full contact details at both the Summer 2022 Consultation and Summer 2024 Consultation and wanted to be kept in touch about the Project. These will be sent to capture	Notifications were sent to prescribed and non-prescribed stakeholders where appropriate email addresses where available within the public domain. All emails were sent from the dedicated inbox 'hampshirewtwrp@southernwater.co.uk'. An email was also sent to members of the wider community who had previously



Section of Approach to Consultation document	Paragraph of Approach to Consultation document	Commitment as set out in the Approach to Consultation document	How the Applicant has fulfilled the commitment
		wider areas beyond the specific consultation zones.'	expressed an interest to be kept informed about updates regarding the Project.
	Table outline Method and Detail	'A Project website will be the digital hub for Spring 2025 Consultation and will include the Consultation information and materials, and options to request further information or accessible print versions of consultation materials. www.HampshireWTWRP.co.uk'	The Applicant updated its dedicated consultation website. The website hosted an online feedback form which was situated on the home page for easy access. Consultation documents where available to view and download within the document library. The documents were in PDF format which facilitated online viewing and downloads. Other parts of the website were updated to reflect the new and previous consultations. Some places did request physical copies of the materials being sent to them and the Applicant did so.
	2.2.1 Consultation Materials	'The following information will be available for viewing online during the consultation: • 'Consultation Information document – including an introduction to the consultation, a summary of the updated water	The Applicant confirms that all consultation materials were available to view online. Physical copies of the feedback form were also available, free of charge, upon request. The Applicant was made aware of three typographical errors in the consultation



Section of Approach to Consultation document	Paragraph of Approach to Consultation document	Commitment as set out in the Approach to Consultation document	How the Applicant has fulfilled the commitment
		quality information, information sheets (containing before and after plans plus a description of the change) relating to each of the proposed design refinements, any new Frequently Asked Questions along with information on how to comment and provide feedback. This information will be presented on the website but will be available in printed format. • 'Water Quality Report – a report summarising the updated water quality information, including a nontechnical executive summary of the Report's findings. • 'Feedback form – a simple survey designed to collect feedback on the proposals. • 'Approach to Consultation – this document. It describes how we intend to carry out the Spring 2025 Consultation for the Project.	material. On 12 March 2025, the Applicant updated the website and the online document library, and included a clarification note. No requests were made by seldom heard groups for accessibility related enquiries.



Section of Approach to Consultation document	Paragraph of Approach to Consultation document	Commitment as set out in the Approach to Consultation document	How the Applicant has fulfilled the commitment
		'To ensure accessibility (including seldom heard groups), on request, documents can also be translated, made available in large print, audio versions, braille and in a digital data format. As the Spring 2025 Consultation is to be 'digital first' we won't be holding any in-person events or be providing any deposit locations. We believe this is a proportionate approach given that the Project as a whole has not fundamentally changed. However, people can contact us to ask questions about the Spring 2025 Consultation and, in addition, hard copies of consultation material can sent, free of charge, to consultees if requested.'	
2.3 – When we will consult	Paragraph 1	'The Spring 2025 Consultation will be carried out over a 30-day period from 5 March 2025 until 4 April 2025. Prior to this there will be a two-week preawareness period (from 19 February 2025), during which time posters will	As per the requirements of the Planning Act 2008, the Applicant confirms that it held a statutory public consultation on updated water quality information and 25 proposed design refinements for the Project from 5 March to 4 April 2025. The Applicant can also confirm that posters, notices and other





Section of Approach to Consultation document	Paragraph of Approach to Consultation document	Commitment as set out in the Approach to Consultation document	How the Applicant has fulfilled the commitment
		be distributed, notices published, and content promoted on social media.'	content was published within the pre- awareness period as detailed previously in this table.
2.4 – How the community can provide comments.	Paragraph 2	'In accordance with the SoCC, the following official feedback mechanisms will be provided as part of the consultation: • 'Email comments to: FeedbackHWTWRP@southernwater.co.uk • 'Letters: FREEPOST HAMPSHIRE WTWRP CONSULTATION • 'Feedback form, located on the website www.HampshireWTWRP.co.uk'	The Applicant confirms that feedback was accepted via the channels outlined in the Approach to Consultation document.
2.5 – How we will respond to consultation feedback	Paragraph 1	'As outlined in the SoCC, once the consultation has closed, we will collate and analyse the responses received. We will carefully consider all issues raised and will have regard to this feedback when finalising our Development Consent Order application. As part of the application,	The Applicant confirms that regard will be had to feedback as per Section 49 of the Planning Act 2008. As part of the DCO application, the Applicant will publish a Consultation Report, detailing how they have engaged and consulted on the Project, whilst adhering to legislation and guidance



Section of Approach to Consultation document	Paragraph of Approach to Consultation document	Commitment as set out in the Approach to Consultation document	How the Applicant has fulfilled the commitment
		we will publish a Consultation Report, detailing how we have engaged and consulted on the Project, whilst adhering to legislation and guidance and reporting on the issues raised in the consultation and our response to them.'	and reporting on the issues raised in the consultation and our response to them.
	Paragraph 3	'Any comments received by way of the prescribed methods to the consultation by the deadline may be made available in due course to the Secretary of State, the Planning Inspectorate, appointed Examining Authority, and other relevant statutory authorities so that feedback can be considered as part of the application process. We will ensure that any personal details are not placed on public record, except where it is required in accordance with legislation or legal duty such as land referencing but held securely in accordance with the General Data Protection Regulation (GDPR), the Planning Inspectorate's Customer Privacy	The Applicant confirms that feedback will be summarised in the form of issue statements where feedback will be paraphrased. No personal information will be included within these statements. The Applicant is compliant with guidance on data protection as listed in the 2024 SoCC.





Section of Approach to Consultation document	Paragraph of Approach to Consultation document	Commitment as set out in the Approach to Consultation document	How the Applicant has fulfilled the commitment
		Notice4 and the Data Protection Act 2018. Personal details will be used solely in connection with the consultation process and preparation of and subsequent DCO application.'	
3 – Contact Us	Paragraph 1	'If you have any queries or questions about the Project, including requests for hard copies of any of the consultation documents, or any particular accessibility needs, please contact us at: • 'Email: HampshireWTWRP@southernwater. co.uk • 'Post: FREEPOST HAMPSHIRE WTWRP CONSULTATION	The Applicant confirms that these channels were provided and monitored.



5.3 Consideration of feedback

- 5.3.1 A total of 219 responses to the consultation were received, this included 2 letters via the freepost address, 125 online feedback forms, and 92 emails.
- 5.3.2 Table 5-3 below provides a summary of the feedback themes that have been identified throughout the statutory Spring 2025 Consultation and how these responses are shaping the Applicant's proposals. Full details of how the Applicant has had regard to the feedback received during the non-statutory and statutory consultation periods will be provided in the Consultation Report submitted as part of the DCO application.

Table 5-3 Summary of issues raised at statutory Spring 2025 Consultation and how they are shaping the application

Issues raised at consultation	How consultation responses are shaping the application
The Applicant received feedback challenging the findings presented in the	The Applicant remains confident in its modelling and assessment work that no likely significant effects are anticipated.
Environmental Water Quality Report, specifically the outcomes of the water quality modelling. Concerns were raised regarding the conclusion that significant adverse impacts on Riders Lane Stream, Hermitage Stream, Langstone Harbour and the Solent are unlikely.	Assessments are being finalised to form part of the Environmental Statement alongside ongoing engagement with the Environment Agency, Natural England and Portsmouth Water.
	An Environmental Permit, regulated by the Environment Agency, will be required for the release of recycled water into Havant Thicket Reservoir and for the release of reject water from the Water Recycling Plant to the Solent. The Applicant will apply for this permit in parallel to the DCO process.
The Applicant received feedback about impacts of traffic and transport from construction on the local road network.	Impacts on the road network has been a key issue raised and addressed throughout the development of the Project. The Applicant continues to consider feedback alongside engagement with the relevant highway authorities to reduce impacts from construction traffic.
	The Applicant is also continuing to develop traffic management plans to further control and mitigate traffic impacts which will be submitted as part of the DCO application.

71



Issues raised at consultation	How consultation responses are shaping the application
The Applicant received feedback surrounding the water quality modelling not going far enough or meeting the correct parameters.	Water quality modelling undertaken by the Applicant adheres to the Environment Agency's Surface Water Pollution Risk Assessment process which involves screening a defined suite of parameters to determine if any have the potential to fail its Environmental Quality Standard (EQS) and therefore require further assessment (modelling). If the EQS screening shows predicted concentrations in the reject water to be below the EQS for a parameter, it is screened out and modelling is not required. The EQSs are set out in the Water Framework Directive (Standards and Classification) Directions (England and Wales) 2015, which are strict levels that seek to prevent environmental impacts and includes a comprehensive suite of chemicals. Some chemicals do not have an EQS, in which case it is not possible to assess them against any scientific or regulatory criteria. The modelling approach has been agreed with the Environment Agency. Details of the EQS screening and water quality modelling will be outlined in the Chapter 19 of the Environmental Statement.
The Applicant received feedback around the expectation of a fully detailed Environmental Statement at DCO submission.	The Applicant would like to provide reassurance that a fully detailed Environmental Statement will be submitted as part of the DCO application.
The Applicant received feedback about the possible negative impacts on water quality and nutrients in Havant Thicket Reservoir.	are anticipated within Havant Thicket Reservoir as a result of storing recycled water. The environmental water quality assessments continue to be refined and will be fully reported in the Environmental Statement, together with a Nutrient Assessment, as part of the DCO application.
	The Applicant will apply for an Environmental Permit to release recycled water into Havant



Issues raised at consultation	How consultation responses are shaping the application
	Thicket Reservoir. The Environment Agency will stipulate the water quality requirements of the recycled water.
The Applicant received feedback about the need for pollution prevention should there be errors in any stage of the build or operation of the Project.	The Applicant has sought to provide assurances that appropriate measures and controls would be put in place to prevent possible malfunctions of the treatment process impacting on the environment. The multi-stage water recycling process will feature numerous safeguards, including continuous monitoring, to ensure that significant deviations in expected water quality can be quickly spotted and rectified through partial of full system shutdowns. It will not be possible for treated wastewater to bypass this process and enter Havant Thicket Reservoir. These safeguards will be implemented by the Contractor appointed to construct and operate the Water Recycling Plant and will be a key specification for the plant to ensure water quality requirements will be met.
	Pollution prevention will additionally be controlled through the construction of the project through both the project's design and how it is delivered. Various management plans, including an outline Construction Environmental Management Plan, are being developed to ensure that best practice measures and controls are employed throughout the construction phase to reduce impacts, including pollution prevention. These will be set out within the Applicant's DCO application.
The Applicant received feedback surrounding pharmaceuticals being released into the water environment post-water recycling process.	The Applicant has sought to provide assurances around the efficacy of the water recycling process in removing impurities and compounds before the recycled water is pumped into Havant Thicket Reservoir. In addition, the Applicant has made clear that reject water from the water recycling process (containing impurities removed from the treated wastewater) would be released to the Solent, alongside treated wastewater from Budds Farm



Issues raised at consultation	How consultation responses are shaping the application
	Wastewater Treatment Works. The predicted water quality of this combined release has been assessed against a list of compounds with an EQS provided by the Environment Agency for discharges into the environment. Twelve pharmaceutical and personal care product compounds were assessed and passed the Environment Agency's H1 screening assessment, confirming that concentrations of these compounds are not predicted to have any significant impact on the environment.
The Applicant received feedback about phosphorus removal from the water.	The Applicant acknowledges that it's assessment work presented in its statutory Spring 2025 Consultation highlighted increased levels of phosphorus in Havant Thicket Reservoir as a result of recycled water, but remains confident that this can be reduced through additional treatment at the Water Recycling Plant in order to mitigate any potential effects. This will be further detailed and reported on in the Environmental Statement.
	The Environmental Permit required for the release of recycled water into Havant Thicket Reservoir will stipulate the water quality requirements that need to be achieved and the Applicant is working closely with the Environment Agency to progress this permit.
The Applicant received feedback about the effect of compensatory flows on marine and freshwater biodiversity, and wildlife at Havant Thicket Reservoir, Riders Lane Stream, Hermitage Stream and Langstone Harbour.	The modelling and assessment work presented at the statutory Spring 2025 Consultation confirmed that, subject to phosphorus mitigation, there were no likely significant effects anticipated on biodiversity. This work is currently being finalised and will be fully reported in the Environmental Statement as part of the DCO application.
The Applicant received feedback about the possibility of algal blooms forming in Havant Thicket Reservoir.	The modelling and assessment work undertaken to date and shared at statutory Spring 2025 Consultation has shown an increased level of phosphorus in the recycled water. The Applicant has proposed to reduce



Issues raised at consultation	How consultation responses are shaping the application
	this through additional treatment at the water recycling plant in order to reduce the increased potential for algal blooms in Havant Thicket Reservoir. This will be further detailed and reported on in the Environmental Statement.
The Applicant received feedback about the effects of noise and vibrations caused by construction and operation of the Project to structures and humans.	The Noise and Vibration assessment, which will be included in the Environmental Statement, will present an assessment of the effects caused by the construction and operation of the Project on noise and vibration. This work has built on the assessment presented in the Preliminary Environmental Information Report, provided as part of the statutory Summer 2024 Consultation. To mitigate the potential noise and vibration effects, both an Outline Construction Environmental Management Plan (CEMP) and Outline Operational Management Plan have been developed to include relevant measures. Specifically for construction, the Outline CEMP requires that a Noise and Vibration Management Plan be prepared prior to works commencing, and includes a minimum set of management and monitoring processes to be followed.
The Applicant received feedback about the energy use and carbon emissions that the Project could emit.	The energy use of the Project was considered in the Options Appraisal Process carried out in 2021. This confirmed the Project as the most sustainable solution.
	Since statutory Summer 2024 Consultation, the Applicant has developed and prepared the Outline Carbon Management Plan which will set out measures being embedded into the Project to reduce carbon. The Outline Carbon Management Plan will be submitted as part of the DCO application.
The Applicant received feedback about cumulative effects of the Project.	The Applicant has carefully considered the cumulative effects of the Project alongside other relevant developments. This includes through engagement with all local authorities and highway authorities to consider the methodology for considering other relevant



Issues raised at consultation	How consultation responses are shaping the application
	developments and agreeing the lists of developments. These lists have been updated since statutory Summer 2024 Consultation and will be reported in the Environmental Statement Chapter 20 Cumulative and in-combination effects.
The Applicant received feedback about the potential impacts of construction on Public Rights of Way (PRoWs).	The Applicant acknowledges the feedback and minimising impacts on PRoWs has been a consideration throughout the Project development process. The Applicant has engaged closely with relevant local authorities and highway authorities, such as Hampshire County Council and South Downs National Park Authority, to address concerns raised. This feedback continues to inform not only the Applicant's Environmental Statement but also its Framework Rights of Way Management Plan.
The Applicant received feedback around the use of agricultural land for the Project and its impact on landowners.	Engagement with landowners has been ongoing throughout Project development to reduce impacts on agricultural land and many design refinements have been made and consulted on in this respect through the statutory Spring 2025 Consultation and subsequent statutory Autumn 2025 Targeted Consultation.
The Applicant received feedback about impacts to access to recreational grounds during the construction phase.	The Applicant acknowledges this feedback surrounding access to recreation grounds and has considered this through the Project development process and sought to reduce impacts on existing access. Access and amenity impacts on recreational grounds will be considered in Chapter 12 of the Environmental Statement. Health impacts on users of green spaces will be considered within Chapter 17 of the Environmental Statement. Both of these chapters will be submitted as part of the Environmental Statement with the DCO application.



Issues raised at consultation	How consultation responses are shaping the application
The Applicant received feedback about the proposed working hours and the disruption these could cause.	The Applicant has acknowledged that construction work is likely to cause disturbance in some locations and has made significant efforts to locate works away from residential properties to avoid and reduce any impacts. But notwithstanding that, an Outline CEMP will provide provision for the Noise and Vibration Management Plan which is to be prepared by the appointed Contractor. The appointed Contractor is to also apply working hour restrictions as additional mitigation if preconstruction assessments show this to be required.
The Applicant received feedback about the logistics of crossing rivers with pipelines.	Information regarding the proposed construction methodology has been a key focus of the pre-application consultation process. This topic has been discussed in detail through technical working groups held with the Environment Agency and other bodies, ensuring that relevant stakeholders are informed and can influence the approach.
The Applicant received feedback about how the waste from the water recycling process would be disposed of.	The Applicant has confirmed through its consultations that reject water from the water recycling process would be pumped back to Budds Farm Water Treatment Works, prior to release via the existing Eastney Long Sea Outfall. It is worth noting however that this waste is in liquid form, rather than sludge. This will continue to be detailed as part of the DCO application.
The Applicant received feedback about the implications of possible pipeline bursts.	The Applicant has designed the Project to ensure that the probability of a pipeline bursting is extremely low. Nonetheless, the Applicant set out in its statutory Summer 2024 Consultation how major accidents and disasters would be managed, and this will again be set out as part of the DCO application in the Environmental Statement. This will detail that a legal easement over strips of land either side of, and above and below, the entire alignment of the pipeline would be required to restrict certain activities that could adversely affect the infrastructure.



Issues raised at consultation	How consultation responses are shaping the application
	These activities include prevention of piling or percussive activities, prevention of building a wall or structure (unless easily removed), and anything that could endanger the pipe and cause a leak. The Applicant will aim to secure the necessary legal easements by working with landowners.
	Isolation valves would be installed on the pipeline to reduce flooding in the unlikely event of a burst, and a design principle for safety, security and emergency is proposed to be set out in the Design Principles Document.
	Further mitigation for the risk of flooding and pipe leaks during the operation of the Project will be detailed in the Outline Operational Management Plan. This includes the formation of an incident team and its operation and deescalation. These measures will further help to reduce potential flooding from a pipe burst.
The Applicant received feedback about the operation of the Water Recycling Plant's technology.	The Water Recycling Plant will be operated and maintained by an appointed Contractor. They will be undertaking proactive maintenance throughout the lifetime of the Project to ensure the Water Recycling Plant is working and operating smoothly.
The Applicant received feedback about security and surveillance of Havant Thicket Reservoir.	The Applicant notes that the construction and operation of Havant Thicket Reservoir is a matter for Portsmouth Water, as it is responsible for delivering Havant Thicket Reservoir.
The Applicant received negative feedback about the design and visual impact of Above Ground Plant.	The design of the Project is a key matter for the Applicant, and it is in the process of developing and agreeing design principles with local authorities to ensure the design of the Above Ground Plant is appropriate to its setting and reduces visual impacts. Feedback on the Above Ground Plant continues to be considered as the outline design for the DCO application is finalised.



Issues raised at consultation	How consultation responses are shaping the application
The Applicant received feedback about the acceptability of drinking recycled water.	The Applicant continues to provide assurance around the efficacy of the water recycling process and the fact that water going into supply will continue to meet strict regulatory standards on drinking water quality.
The Applicant received feedback from landowners about security and access to properties during the construction phase.	This feedback has been acknowledged, and the Applicant has confirmed that crossing points and site accesses would be locked to maintain safety and security during the construction process. Further measures will be detailed in the various management plans that will support the DCO application to control activities during the construction process in order to reduce impacts.
The Applicant received feedback about the options appraisal for alternatives to water recycling not being robust enough.	The Applicant has made clear throughout its consultations that the Options Appraisal Process undertaken in 2021 to select the Project confirmed it as the most sustainable and best value solution and that the project continues to be selected in the Applicant's final draft WRMP24 for delivery at the earliest opportunity. The development and progression of the Project has been overseen and supported by the Applicant's regulators.
The Applicant received feedback around the mixing of recycled and spring water.	The Applicant acknowledges this feedback, however it has made clear that the proposed use of Havant Thicket Reservoir for storing recycled water remains a key part of the proposal which is embedded in the need for the Project. The Applicant has sought to provide reassurance around the efficacy of the water recycling process and additional information on environmental water quality was presented in the statutory Spring 2025 Consultation. Using recycled water to help fill Havant Thicket Reservoir also provides resilience to the reservoir during drought.
The Applicant received feedback about the lack of incorporation of feedback surrounding design elements	The Applicant has had regard to all feedback from its statutory Summer 2024 Consultation and has reflected this in the development and design of the Project where reasonably



Issues raised at consultation	How consultation responses are shaping the application
of the Project from the statutory Summer 2024 Consultation.	practicable and feasible, including for example multiple amendments to the pipeline route to avoid and reduce impacts on landowner interests. This collaborative approach has helped shape a more responsive and considerate proposal. Through the nonstatutory Summer 2022 Consultation and statutory Summer 2024 Consultation, the Applicant has broadly set out how it is considering feedback received. This has been explained through summary and feedback reports published on the consultation website. In addition to these reports, the Applicant has detailed how the design of the Project has evolved through its Scheme Development Summary reports. Further information on how the design of the Project has been influenced by consultation feedback will be included in the Consultation Report which will be submitted as part of the DCO application.
The Applicant received feedback surrounding the cost to the customer of the Project.	The Applicant has made clear throughout its consultations that the Options Appraisal Process undertaken in 2021 to select the Project confirmed it as the most sustainable and best value solution and that the Project continues to be selected in the Applicant's final draft WRMP24 for delivery at the earliest opportunity. The development and progression of the Project has been overseen and supported by the Applicant's regulators. As with all the Applicant's costs, the funding for new infrastructure, such as the Project, will be averaged across water supply customers' bills and will be subject to approval by the water industry regulator, Ofwat.
The Applicant received negative feedback about the use of Portsmouth Water's pipeline for transporting recycled water, instead of purely water from Bedhampton Springs.	The use of the Portsmouth Water's pipeline for transferring recycled water to Havant Thicket Reservoir can only be achieved through a successful DCO. Using Portsmouth Water's infrastructure means the Applicant does not need to build a separate tunnel at a later date through the urban area of Havant. This delivers overall a better value for money outcome for

WATER from Southern Water

Issues raised at consultation	How consultation responses are shaping the application
	customers and a less disruptive outcome for local communities and the environment.
The Applicant received feedback about Design Refinement 3 (Pipeline Sections A and B) and effects on existing infrastructure and natural assets.	The backup tunnel proposal through Havant is no longer part of the Project following the consenting of Portsmouth Water's pipelines. The Applicant is working closely with Portsmouth Water on the interface of the two projects and continues to ensure that impacts of the Project on other infrastructure and the environment are avoided and reduced where reasonably practicable.
The Applicant received feedback from asset owners about future cooperation in the DCO process.	The Applicant is engaging with identified undertakers and asset owners regarding the development of the Project.

5.4 Summary

- 5.4.1 As the Applicant had done so following the statutory Summer 2024 Consultation feedback, it reviewed the feedback received from the statutory Spring 2025 Consultation. This highlighted further amendments to the design which the Applicant then consulted on in the Autumn of 2025. An explanation showing where consultation responses have led to changes to the Project will be included in the Consultation Report, submitted with the DCO application.
- 5.4.2 Feedback on environmental water quality modelling, and freshwater and marine biodiversity assessments are being considered as the Applicant finalises the Environmental Statement which will contain the full assessment of the water quality modelling undertaken by the Applicant and Portsmouth Water. The DCO application will include details of any proposed monitoring and mitigation.



6 Local authority views on 'Adequacy of Consultation'

6.1 Approach

- 6.1.1 The Applicant chose to actively engage with local authorities to support the AoCM submission.
- 6.1.2 On the 25 February 2025, the Applicant held a Joint Officer Group meeting and explained the purpose and content of the AoCM submission. The Applicant informed local authorities that it would be asking for their views on the compliance of statutory consultations for the Project.
- 6.1.3 At a subsequent Joint Officer Group meeting on 7 May 2025, the Applicant shared a proposed structure and programme for the AoCM submission and explained that they would write to local authorities asking for their comments.
- 6.1.4 A copy of the letter sent to the local authorities on 16 May 2025 can be found in **Appendix A**. The Applicant asked local authorities for their views and any relevant supporting material on the Applicant's compliance with the following:
 - Section 42 Duty to consult
 - Section 47 Duty to consult local authorities
 - Section 48 Duty to publicise
- 6.1.5 The letter was appended with a form to support local authorities with their response. A response was requested by 7 May 2025.
- 6.1.6 In reply, Portsmouth City Council and Havant Borough Council stated that they could not confirm whether the Applicant had complied with Section 48 of the Planning Act 2008. In response, on 12 June 2025, the Applicant emailed the local authorities and provided copies of the published Section 48 notices for both the statutory Summer 2024 Consultation and the statutory Spring 2025 Consultation.
- 6.1.7 On 13 June 2025, Portsmouth City Council requested evidence to confirm that all consultees had been consulted. On 10 July 2025, the Applicant held a meeting with Portsmouth City Council to explain the approach taken to comply with Section 42 of the Planning Act 2008.

6.2 Summary of local authority views

6.2.1 The Applicant received responses from all seven local authorities. These can be viewed in **Appendix B**. A summary of the local authority responses in relation to the Applicant's compliance with the Planning Act 2008 are represented in **table 6-1** below.

WATER from Southern Water

Table 6-1 Local authority responses with regards to compliance with the Planning Act 2008

Local authority	Date of response	Assessment of compliance response (Yes/No)				
		Section 42	Section 47	Section 48		
East Hampshire District Council	20 May 2025	Yes	Yes	Yes		
Eastleigh Borough Council	24 June 2025	Yes	Yes	Yes		
Fareham Borough Council	2 June 2025	Yes	Yes	Yes		
Hampshire County Council	9 June 2025	Yes	Yes	Yes		
Havant Borough Council	17 June 2025	Yes	Yes	Yes		
Portsmouth City Council	10 July 2025	Yes	Yes	Yes		
Winchester City Council	9 June 2025	Yes	Yes	Yes		



7 Next steps

7.1 Further consultation

- 7.1.1 The Applicant held a targeted consultation, the statutory Autumn 2025 Targeted Consultation, on eight further design refinements with landowners and persons with an interest in land in Autumn 2025. The design refinements are minor and localised in nature, and only those with a direct land or property interest associated with the changes were consulted.
- 7.1.2 The Applicant wrote to those that are affected and provided an information sheet that detailed the proposed change to the design, why the design change is proposed and how the change might affect the consultee or the environment. The feedback mechanisms used are the those outlined in the 2024 SoCC.
- 7.1.3 At the close of the statutory Autumn 2025 Targeted Consultation, the Applicant had received two consultation responses which are being reviewed. Full details of how the Applicant will have regard to the feedback received during this consultation will be provided in the Consultation Report submitted as part of the DCO application.

7.2 Ongoing engagement

- 7.2.1 The Applicant will continue to engage with key stakeholders with the purpose of seeking to actively resolve outstanding issues though existing working groups and ongoing dialogue and continue to refine the Project prior to the DCO application. A Statement of Engagement will accompany the DCO application and will detail the pre-application engagement undertaken by the Applicant alongside the consultations for the Project.
- 7.2.2 The Programme Document will be updated on the Applicant's dedicated consultation website as required. In addition, a news section has been added to the consultation website to keep the wider community and stakeholders up to date with latest project news prior to the DCO submission. The Applicant will notify key stakeholders and those that wanted to be informed of any updates when news articles are added to the consultation website.
- 7.2.3 A theme from the feedback the Applicant has received from ongoing engagement and through consultation is the public acceptability of a change in drinking water which uses recycled water as part of its source. Change of source engagement is a specific phase of engagement with all affected customers that is proposed to occur much closer to the change in their drinking water source. The Drinking Water Inspectorate (DWI) has confirmed there are no prescribed engagement requirements so this will be for the Applicant to design and implement, to meet legal and regulatory requirements, working closely with the DWI. Following discussions with the DWI, the Applicant has set out a plan to begin engaging specifically on a change of source two years ahead of recycled water becoming part of a new source of supply. This will be after DCO consent is granted for the Project. This timescale will ensure the messages customers receive are timely and use the most matured

WATER Southern Water

and accurate information available and the most effective channels available at that time.

7.3 **Consultation Report**

- 7.3.1 The Applicant is continuing to analyse and consider all feedback received during each stage of consultation for the Project to inform the Project and application. The Consultation Report will be prepared and submitted as part of the DCO application, in accordance with section 37(3)(c) of the Planning Act 2008.
- 7.3.2 The Consultation Report will thematically summarise the responses received at the statutory consultations and, in accordance with Section 49 of the Planning Act 2008, report on how regard to the responses received has been given. The Applicant will identify and report where consultation responses have led to changes to the Project.
- 7.3.3 The Applicant will submit a Statement of Engagement with the DCO application. This document will outline the Applicant's engagement with stakeholders and communities, highlighting how outcomes from engagement have shaped the development of the Project.

Document Code: 710166-SWS-XX-XX-RP-EN-



Appendix A Local authority letter and form

Document Code: 710166-SWS-XX-XX-RP-EN-







East Hampshire District Council PO Box 310 Petersfield GU32 9HN Date 16 May 2025



Hampshire Water Transfer and Water Recycling Project

Adequacy of Consultation Milestone (AoCM)

On 30 April 2024, the government published updated guidance on the pre-application stage for Nationally Significant Infrastructure Projects¹ and introduced the Adequacy of Consultation Milestone (AoCM)². The AoCM allows early consideration of the adequacy of consultation undertaken by project promoters and therefore reduces the risk of this being an issue at the acceptance stage of the Development Consent Order submission. The guidance sets out that the AoCM should:

- be recorded by the applicant and submitted to the Planning Inspectorate as a short statement
- comprise the elements of consultation which have been carried out compared with the components set out in the Programme Document and the SoCC
- include the views and any relevant supporting material from local authorities

We are writing to you to ask for your views to inform and provide any supporting material relevant to the AoCM submission.

About the Project

As a reminder, the Project will transform how we source, treat and supply water across Hampshire. In the face of increasing environmental restrictions, population growth and climate change, the Project will help maintain essential water supplies for customers while taking less water from the environment, protecting the rare and sensitive chalk streams of the River Test and River Itchen.

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 an underground 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 our Otterbourne Water Supply Works where it would be treated to strict drinking water standards before being sent into supply.

The Project has been directed by the Secretary of State as a project of national significance. We are therefore seeking consent for the Project under the Planning Act 2008 and anticipate making an

¹ https://www.gov.uk/guidance/planning-act-2008-pre-application-stage-for-nationally-significant-infrastructure-projects

² Paragraph 025 Reference ID 02-025-20240430 Published: 30/04/2024

application to the Secretary of State for a Development Consent Order in late 2025. As the Project falls within the threshold set out in Schedule 2 paragraph 10(I) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 2017 Regulations), the Project will require an Environmental Impact Assessment (EIA). Accordingly, we prepared a Preliminary Environmental Information Report (PEI Report) as part of our Summer 2024 Consultation to help you understand the preliminary likely significant environmental effects of our proposals that we identified.

Summary of ongoing engagement

We have sought to engage with stakeholders throughout the development of the Project including outside of the non-statutory and statutory consultation periods. This ongoing engagement has been undertaken through various mechanisms and has sought to keep key stakeholders informed about the progress of the Project, inform the ongoing design of the Project and enable timely discussions on opportunities and outstanding matters for continuing engagement identified.

Summary of non-statutory and statutory consultations on the Project

Date	Consultation activity	Details
8 February to 16 April 2021	Non-statutory Public Consultation 2021	Desalination and alternative options.
5 July to 16 August 2022	Non-statutory Summer 2022 Consultation	Water recycling as a new, sustainable water resource, the location of the proposed water recycling plant, the preferred pipeline corridor, and zones for above ground plant.
16 February to 19 April 2024	Consultation on the Statement of Community Consultation (SoCC)	Informal consultation undertaken with local authorities between 16 February and 1 March 2024. Southern Water presented the first draft of the SoCC at the Joint Officer Group meeting on 21 February 2024. Statutory consultation with local authorities undertaken between 21 March and 19 April 2024, providing 28 days to respond.
29 May to 23 July 2024	Statutory Summer 2024 Consultation	The Project overall, the proposed pipeline routes, the proposed water recycling plant and associated pumping stations, proposed above ground plant along the pipeline route. The PEI Report formed part of the suite of consultation documents.
5 March to 4 April 2025	Statutory Spring 2025 Consultation	Environmental water quality and design refinements across the Project.

Your views on consultation

To inform the AoCM submission, we would be grateful to receive your views and any relevant supporting material on our compliance with the following:

- Section 42³ Duty to consult
 - Section 42 of the Planning Act 2008, together with the provisions of sections 43 and 44 of the Planning Act, requires applicants to consult certain persons, including statutory consultees, local authorities, and others with a relevant interest in the land to which the proposed application relates, prior to the submission of an application. The prescribed list of statutory consultees for the purposes of section 42 of the Planning Act 2008 is set out in Schedule 1 to the APFP Regulations 2009, as amended by the Infrastructure Planning (Miscellaneous Provisions) Regulations 2024.
- Section 47⁴ Duty to consult local authority
 - Section 47 of the Planning Act 2008 requires applicants to consult relevant local authorities on what is to be in their SoCC setting out how applicants intend to consult the local community on the proposed Development Consent Order application and then carry out consultation in accordance with the SoCC.
- Section 48⁵ Duty to publicise
 - Section 48 of the Planning Act 2008 requires applicants to publicise the proposed application in the prescribed manner as set out in Regulation 4 of the APFP Regulations 2009.

For ease, v	we have	included	a form	to	assist	your	response,	should	you	wish	to	use	this	format.
Please resp	ond in w	vriting to							by 7	June	20)25 .		

We look forward to hearing from you.

Yours sincerely,

Water for Life Hampshire, Planning and Consenting Lead

Enc. Adequacy of Consultation form

³ https://www.legislation.gov.uk/ukpga/2008/29/section/42

⁴ https://www.legislation.gov.uk/ukpga/2008/29/section/47

⁵ https://www.legislation.gov.uk/ukpga/2008/29/section/48



Adequacy of Consultation form

Local Authority

Hampshire Water Transfer and Water Recycling Project

To provide feedback on the adequacy of Southern Water's statutory consultations in advance of the Development Consent Order Application, please fill in the following form.

Date	
Please state if in your oni	nion, and with reference to the statutory consultations undertaken for the
Hampshire Water Transfe	er and Water Recycling Project, Southern Water has complied with the ements of the Planning Act 2008.
Section 42 ¹ Duty to cor	ısult
Assessment of compliance	Yes / No
Additional comments (optional)	
Section 47 ² Duty to cor	isult local authority
Assessment of compliance	Yes / No
Additional comments (optional)	
Section 48 ³ Duty to pub	olicise The second seco
Assessment of compliance	Yes / No
Additional comments (optional)	



¹ https://www.legislation.gov.uk/ukpga/2008/29/section/42

² https://www.legislation.gov.uk/ukpga/2008/29/section/47

³ https://www.legislation.gov.uk/ukpga/2008/29/section/48

Hampshire Water Transfer and Water Recycling Project Adequacy of Consultation form

Further co	Further comments (optional)					
Additional comments						



Appendix B Local authority views on adequacy of consultation

Document Code: 710166-SWS-XX-XX-RP-EN-



B.1 East Hampshire District Council

WATER Southern Water



Adequacy of Consultation form

Section 42¹ Duty to consult

Hampshire Water Transfer and Water Recycling Project

To provide feedback on the adequacy of Southern Water's statutory consultations in advance of the Development Consent Order Application, please fill in the following form.

Local Authority	East Hampshire District Council
Date	20 th May 2025

Please state if in your opinion, and with reference to the statutory consultations undertaken for the Hampshire Water Transfer and Water Recycling Project, Southern Water has complied with the following legislative requirements of the Planning Act 2008.

Assessment of compliance	Yes
Additional comments (optional)	
Section 47 ² Duty to con	sult local authority
Assessment of compliance	Yes
Additional comments (optional)	
Section 48 ³ Duty to pub	plicise
Assessment of compliance	Yes
Additional comments (optional)	



¹ https://www.legislation.gov.uk/ukpga/2008/29/section/42

² https://www.legislation.gov.uk/ukpga/2008/29/section/47

³ https://www.legislation.gov.uk/ukpga/2008/29/section/48

Further comments (optional)					
Additional comments Both Havant Bord with Southern Wa	ough Council and East Hampshire Council has signed up to a PPA ater.				



B.2 Eastleigh Borough Council





Application

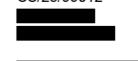
CS/24/97230

CS/24/97534 CS/25/99012

Hampshire Water Transfer and Water Recycling Project Southern Water

Please ask for Direct dial Working hours

Email



Tuesday 24 June 2025

Dear Sir/Madam

Via email to:

Description: Southern Water - Hampshire Water Transfer and Water

Recycling Project – Adequacy of Consultation Milestone

Site: Havant Thicket Reservoir to Otterbourne Water Supply Works

I am writing to confirm that the Council does consider that the developer has complied with the following duties with respect to its consultation with the Council as the Local Authority and publications within local newspapers for the section of the works located within Eastleigh Borough:

- Duty to consult Planning Act 2008 (as amended) (PA2008) section 42
- Duty to consult the local community PA2008 section 47
- Duty to publicise PA2008 section 48

It should be noted that the Council did not see the newspaper advertisements at the time of publication but has been provided with electronic copies of the advertisements by Southern Water and base its comments on those copies.

We do not comment on whether these duties have been met with regard to other interested parties or other authorities.

Yours faithfully

Planning Manager

B.3 Fareham Borough Council

WATER from Southern Water



Adequacy of Consultation form

Hampshire Water Transfer and Water Recycling Project

To provide feedback on the adequacy of Southern Water's statutory consultations in advance of the Development Consent Order Application, please fill in the following form.

Local Authority	Fareham Borough Council
Date	2 June 2025

Please state if in your opinion, and with reference to the statutory consultations undertaken for the Hampshire Water Transfer and Water Recycling Project, Southern Water has complied with the following legislative requirements of the Planning Act 2008.

Section 42 ¹ Duty to consult				
Assessment of compliance	Yes /No			
Additional comments (optional)	The Council considers that all relevant persons, statutory consultees, local authorities and others with relevant interest in the land to which the proposed application relates have been satisfactorily consulted in so far as the impact on Fareham Borough.			

Section 47 ² Duty to consult local authority			
Assessment of compliance	Yes / No		
Additional comments (optional)	Appropriate consultation with FBC on the SoCC has taken place, and relevant consultations taken place in accordance with the SoCC.		

Section 48 ³ Duty to publicise		
Assessment of compliance	Yes / No	

¹ https://www.legislation.gov.uk/ukpga/2008/29/section/42



² https://www.legislation.gov.uk/ukpga/2008/29/section/47

³ https://www.legislation.gov.uk/ukpga/2008/29/section/48

Section 48 ³ Duty to publicise	
Additional comments (optional)	Appropriate consultation within local publications has taken place.

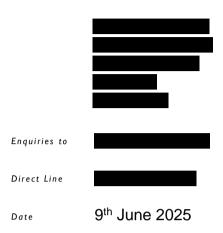
Further comments (optional)		
Additional comments	Please note, we do not comment on whether these duties have been met with regard to other interested parties or other authorities.	



B.4 Hampshire County Council

WATER from Southern Water





Hampshire 2050 The Castle Winchester, Hampshire SO23 8UL

Telephone 0300 555 1375 Fax 01962 847055 www.hants.gov.uk

My reference

SWAOCM

Your reference

E-mail

Email to:

Dear Sir/Madam,

Southern Water adequacy of consultation milestones for the Hampshire Water Transfer and Water Recycling Project

Thank you for consulting the County Council on the adequacy of consultation milestones for the Hampshire Water Transfer and Water Recycling Project.

In response to this request, the County Council provides the response as set out in the table below, which considers whether the applicant has complied with the following duties with respect to its consultation with the County Council as an upper tier Local Authority for this project:

- Duty to consult Planning Act 2008 (as amended) (PA2008) section 42
- Duty to consult the local community PA2008 section 47
- Duty to publicise PA2008 section 48

The County Council will not comment on whether these duties have been met with regard to other interested parties or other authorities.

Southern Water Adequacy of consultation milestones

Date	Consultation activity	Details	HCC comments
8 February to 16 April 2021	Non-statutory Public Consultation 2021	Desalination and alternative options	As per Section 42 of the Planning Act, the County Council can confirm that it was consulted on the various options and

	T	<u> </u>	participated in Isiat Local
			participated in Joint Local Authority Officer Group briefings at this time.
5 July to 16 August 2022	Non- Statutory Summer 2022 Consultation	Water recycling as a new, sustainable water resource, the location of the proposed water recycling plant, the preferred pipeline corridor, and zones for above ground	Additionally, the County Council has evidence of attendance at Joint Officer Group briefings in October 2021, after this consultation updating local authorities on the decision to discount the Desalination option, instead moving the applicants focus onto the water recycling and water transfer options. As per Section 42, the County Council was consulted via email (22nd June 2022) and formally responded on 16th August 2022.
16 February to 19 April 2024	Consultation on the Statement of Community Consultation (SoCC)	Informal consultation undertaken with local authorities between 16 February and 1 March 2024. Southern Water presented the first draft of the SoCC at the Joint Officer Group meeting on 21 February 2024. Statutory consultation with local authorities undertaken between 21 March and 19 April 2024, providing	As per Section 47 and 48 of the Planning Act, the County Council can confirm that it was presented the SoCC at the Joint Officer Group meeting as detailed and then was formally consulted on the SoCC as detailed, without providing any formal comments to the applicant.
29 May to 23 July 2024	Statutory Summer 2024 Consultation	28 days to respond. The Project overall the proposed pipeline routes, the proposed water recycling plant and associated pumping	The County Council can confirm that it was formally consulted via a Section 48 notification on this statutory consultation, which included

		stations, proposed above ground plant along the pipeline route. The PEI Report formed part of the suite of consultation documents.	the PEIR, and responded formally on 26 July 2024
5 March to 4 April 2025	Statutory Spring 2025 Consultation	Environmental water quality and design refinements across the project	As per Section 42 of the Planning Act, the County Council can confirm that it was consulted on this consultation via email on 5 th March and responded on 4 th April 2025.

I trust that these comments are of assistance to you. If you wish to discuss any of the comments raised, please do not hesitate to contact the County Council.

Yours sincerely

Strategic Planning Manager Hampshire 2050



Adequacy of Consultation form

Hampshire Water Transfer and Water Recycling Project

To provide feedback on the adequacy of Southern Water's statutory consultations in advance of the Development Consent Order Application, please fill in the following form.

Local Authority	Hampshire County Council
Date	06/06/2025

Please state if in your opinion, and with reference to the statutory consultations undertaken for the Hampshire Water Transfer and Water Recycling Project, Southern Water has complied with the following legislative requirements of the Planning Act 2008.

Section 42 ¹ Duty to consult	
Assessment of compliance	Yes
Additional comments (optional)	Hampshire County Council as a host authority has been consulted on this proposal

Section 47 ² Duty to consult local authority	
Assessment of compliance	Yes
Additional comments (optional)	The County Council as a host authority confirms that the applicant did consult the County Council regarding their statement in respect of who they intended to consult with about the proposed application.

Section 48 ³ Duty to publicise	
Assessment of compliance	Yes



¹ https://www.legislation.gov.uk/ukpga/2008/29/section/42

² https://www.legislation.gov.uk/ukpga/2008/29/section/47

https://www.legislation.gov.uk/ukpga/2008/29/section/48

Hampshire Water Transfer and Water Recycling Project Adequacy of Consultation form

Section 48 ³ Duty to publicise		
Additional comments (optional)		
Further co	mments (opt	ional)
Additional comments		



B.5 Havant Borough Council

WATER from Southern Water

00049



Adequacy of Consultation form

Hampshire Water Transfer and Water Recycling Project

To provide feedback on the adequacy of Southern Water's statutory consultations in advance of the Development Consent Order Application, please fill in the following form.

Local Authority	Havant Borough Council
Date	17 June 2025

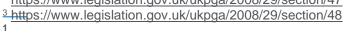
Please state if in your opinion, and with reference to the statutory consultations undertaken for the Hampshire Water Transfer and Water Recycling Project, Southern Water has complied with the following legislative requirements of the Planning Act 2008.

Section 42 ¹ Duty to consult		
Assessment of compliance	Yes	
Additional comments (optional)	The applicant has directly consulted Havant Borough Council during formal consultation periods on the proposal. The applicant is also in ongoing informal discussions with Havant Borough Council about the proposed application. This includes joint officer groups for all the relevant LPAs, topic-based meetings regarding the emerging EIA work, as well as bi-lateral meetings between the project team and direct email communications. NB We do not comment on whether or not the applicant has adequately discharged the duties set out in section 42 in relation to other consultees.	

Section 47 ² Duty to consult local authority		
Assessment of compliance	Yes	
Additional comments (optional)	The applicant consulted Havant Borough Council on its Statement of Community Consultation in the Spring of 2024. To the best of the Council's knowledge the consultation on the scheme took place in accordance with the Statement. NB We are not able to confirm whether or not the applicant undertook all the activities exactly as described in its SoCC.	

Section 48 ³ Duty to publicise	
Assessment of compliance	Yes
Additional comments (optional)	The applicant has provided evidence to the Council of notices placed in local newspapers, the Times and the London Gazette.

¹ https://www.legislation.gov.uk/ukpga/2008/29/section/42





² https://www.legislation.gov.uk/ukpga/2008/29/section/47

B.6 Portsmouth City Council

WATER Southern Water

00049



Water for Life Hampshire, Planning and Consenting Lead Southern Water	Directorate of Economy, Transport and Planning Civic Offices Guildhall Square Portsmouth PO1 2AU		
By email only to:	T: M:		
	Our Ref: HWTWRP		
	Your ref: Adequacy of Consultation Milestone (AoCM)		
	10 July 2025		
Dear			
Hampshire Water Transfer and Water Re Adequacy of Consultation Milestone (Ad			
Please find attached, further to email correspondence with on 12 June in regard to the S48 duties and a meeting today, 10 July with of Stantec in regard to the other outstanding matters, an updated Adequacy of Consultation Response Form.			
We do not comment on whether these du interested parties or other authorities	uties have been met with regard to other		
Yours sincerely			
Development Management Team Leader (CIL, Enforcement & Trees)		
	•		





Adequacy of Consultation form

Hampshire Water Transfer and Water Recycling Project

To provide feedback on the adequacy of Southern Water's statutory consultations in advance of the Development Consent Order Application, please fill in the following form.

Local Authority	Portsmouth City Council
Date	5 June 2025 & <mark>10 July 2025</mark>

Please state if in your opinion, and with reference to the statutory consultations undertaken for the Hampshire Water Transfer and Water Recycling Project, Southern Water has complied with the following legislative requirements of the Planning Act 2008.

Section 42 ¹ Duty to consult		
Assessment of compliance	Yes / No	
Additional comments (optional)	Portsmouth City Council, being a local authority as defined in S43 PA2008, has been consulted. However, PCC does not at this time have sight of evidence to confirm that all consultees (statutory, non-statutory, other) have been consulted.	
	Following a meeting with Stantec on 10 July, I can confirm that evidence has been presented to conform that all consultees have been consulted.	

Section 47 ² Duty to consult local authority		
Assessment of compliance	Yes / No	
Additional comments (optional)	Southern Water have published a 'statement of community consultation'	



¹ https://www.legislation.gov.uk/ukpga/2008/29/section/42

² https://www.legislation.gov.uk/ukpga/2008/29/section/47

Hampshire Water Transfer and Water Recycling Project Adequacy of Consultation form

Section 48 ³ Duty to publicise		
Assessment of compliance	Yes / No	
Additional comments (optional)	S48(1) requires the applicant to publicise the application in the prescribed manner. Regulation 4(2) of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 sets out where the notices should be published. As with the S42 duty above, PCC does not at this time have sight of evidence to confirm that this has been carried out. Update (10/07/25), PCC can confirm that the application has been publicised in the correct manner.	

Further co	comments (optional)	
Additional comments		



³ https://www.legislation.gov.uk/ukpga/2008/29/section/48

B.7 Winchester City Council

WATER from Southern Water

From: Sent: To: Cc: Subject:

09 June 2025 12:20

RE: HWTWRP - AoCM letter

Many thanks for the below,

Kind regards,





From:

Sent: 09 June 2025 12:12

To:

Subject: RE: HWTWRP - AoCM letter

Good Morning

I am writing to confirm that the Council does consider that the developer has complied with the following duties with respect to its consultation with the Council as the Local Authority and publications within local newspapers for the initial section of the pipeline within Winchester:

- Duty to consult Planning Act 2008 (as amended) section 42
- Duty to consult the local community section 47
- Duty to publicise section 48

We do not comment on whether these duties have been met with regard to other interested parties or other authorities.

Kindest regards

Principal Planning Officer

Winchester City Council Colebrook Street Winchester, SO23 9LJ







From:

Sent: 09 June 2025 09:25

To:

Subject: FW: HWTWRP - AoCM letter

Caution: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi Good morning,

Hope you had a good holiday!

I apologise for the follow-up, but could you please provide us with your response to the AoCM report by COP today?

Many thanks! Kind regards,





Planner

Mobile: www.quod.com

21 Soho Square London W1D 3QP

From:

Sent: 05 June 2025 10:34

To:

Cc:

Subject: RE: HWTWRP - AoCM letter

Hi Good morning

Good morning,

Just a gentle reminder regarding your response for the AoCM report by the end of this week.

Many thanks! Kind regards,

From: Sent: 16 May 2025 16:08
To:

Cc:

Subject: HWTWRP - AoCM letter

Hi Good afternoon,

Further to the discussion at the Joint Officer Group on 7 May 2025, please find attached a letter and accompanying form asking for your views and any relevant supporting material relating to adequacy of consultation for the Hampshire Water Transfer and Water Recycling Project. Your views will be included in the AoCM report submitted by the Applicant to the Planning Inspectorate with the purpose of reducing the adequacy of consultation risk at the acceptance stage of the DCO submission.

We ask that you kindly respond in writing by 7 June 2025.

Please let me know if you have any questions about the information included in the letter and form, and we look forward to hearing from you.

Have a lovely weekend!

Many thanks! <u>Kind</u> regards,

Disclaimer

This e-mail message and any attached file is the property of the sender and is sent in confidence to the addressee only. Internet communications are not secure and Quod is not responsible for their abuse by third parties, any alteration or corruption in transmission or for any loss or damage caused by a virus or by any other means.

Quod Limited, company number: 07170188 (England).

Registered Office: 21 Soho Square, London, W1D 3QP

For our privacy policy go to http://www.quod.com/privacy-policy/

This email and any files transmitted with it are intended solely for the addressed individual. The information in this email may be confidential; if you have received it in error, please accept our apologies and notify the sender as soon as possible, and delete it from your system without distributing or copying any information contained within it. Under UK Data Protection and Freedom of Information legislation, the contents of this email might have to be disclosed in response to a request. We check emails and attachments for viruses before they are sent, but you are advised to carry out your own virus checks. Winchester City Council cannot accept any responsibility for loss or damage caused by viruses.

