

Hampshire Water Transfer and Water Recycling Project Application Cover Letter

VOLUME NUMBER: 1

PLANNING INSPECTORATE SCHEME NUMBER: WA010002

APPLICATION DOCUMENT REFERENCE: 1.2

APFP REGULATION: 5(2)(g)

May 2026

Version 0



from
**Southern
Water** 

The Southern Water logo consists of three stylized, wavy blue lines of varying lengths, positioned to the right of the word 'Water'.



21 May 2026

Secretary of State c/o
Mr Matthew Sheard
The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Dear Matthew,

Planning Act 2008 - Application for Development Consent - Hampshire Water Transfer and Water Recycling Project

PINS Application Ref: WA010002

Introduction

On behalf of Southern Water Services Limited (the 'Applicant'), I am pleased to enclose an application for a Development Consent Order ('DCO') (the 'Application') pursuant to Section 37(1) of the Planning Act 2008 (the 'PA 2008') for the Hampshire Water Transfer and Water Recycling Project (the 'Project').


Subject of the DCO Application

The Project is a water supply scheme comprising a combination of both water transfer and water recycling technology that will play a major role in making up a shortfall in water supplies across the Applicant's Hampshire supply area, especially in drought conditions.

The PA 2008 is the primary legislation relating to the decision-making process for Nationally Significant Infrastructure Projects (NSIP) and projects of national significance (PNS) for which development consent is required. It provides the legal framework for applying for, examining, and determining DCO applications. To qualify as a NSIP, a proposed project must meet Part 3 of the PA 2008 and fall within the categories set out in Sections 14 to 30 of the PA 2008.

The Project is described in Schedule 1 of the Draft Development Consent Order (the Order) (Document reference 3.1 DCO Volume 3). The Principal Development does not fall within the categories set out in Sections 14 to 30 of the PA 2008 and therefore is not a NSIP.

If a project does not meet the provisions of Part 3, then the Secretary of State for Environment, Food and Rural Affairs (SoS) can give a direction under section 35 of the PA 2008 in response to a qualifying request, the effect of which is to bring a proposed project into the remit of the PA 2008 consenting process and to be treated as development for which development consent is required.



The SoS gave a Direction under Section 35(1) of the PA 2008 on 31 May 2022, which was varied on 19 November 2024, confirming that the “Principal Development” should be treated as a development for which development consent is required. As such, the decision on whether to grant development consent will be made by the SoS.

The Project comprises the construction, operation and maintenance of the following components:

- Water Recycling Plant and associated pumping stations.
- Pipelines between Budds Farm Wastewater Treatment Works and the Water Recycling Plant site.
- Pipelines between the Water Recycling Plant site and Bedhampton Springs, connecting to pipelines being delivered by Portsmouth Water between Bedhampton Springs and Havant Thicket Reservoir.
- 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 site and Otterbourne Water Supply Works.

The Project would also comprise the use of the following infrastructure:

- Havant Thicket Reservoir (which has been consented separately by Portsmouth Water and is currently under construction) for the storage of recycled water.
- The existing Eastney Long Sea Outfall, Eastney Pumping Station, and associated Eastney Transfer Tunnel for the release of reject water from the WRP site.
- Pipelines and other related works (which have been consented separately by Portsmouth Water) for the transfer of recycled water and source water between Bedhampton Springs and Havant Thicket Reservoir.

The construction and operation of the Project would be supported by other temporary and permanent works.

The Project will require the demolition, disassembly and/or temporary relocation of a number of small structures.

A detailed description of the Project can be found in Environmental Statement (ES) Chapter 3 Description of the Proposed Development, Volume I (Document reference 6.1, DCO Volume 6). The Application Glossary (Document reference 1.7, DCO Volume 1) sets out the abbreviations and definitions used in the DCO application for the Project.

Need for the Project

The Project responds to a critical and growing water supply deficit in Hampshire, driven by sustainability reductions in abstractions from internationally rare chalk stream rivers, climate change, and population growth. These pressures are forecast to result in a shortfall of over 200 million litres per day by 2050 during drought conditions.

To address this, the Project will recycle treated wastewater and transfer it to Havant Thicket Reservoir for storage. This will enable approximately 90 million litres of water per day to be transferred from the reservoir to the Applicant's Otterbourne Water Supply Works, helping to maintain essential public water supplies, support planned housing and economic growth, and protect sensitive river systems. Section 3.3 of the Case for the Project (Document reference 5.6, DCO Volume 5) and the Planning Policy Statement (Document reference 5.5, DCO Volume 5) provide a detailed case in support of the Project.

Consent flexibility

The design of the Project cannot be finalised until the procurement process for the Project's construction and operation has been completed and the detailed design has been approved in advance of the Project commencing (or part thereof). This is to enable timely delivery of the Project and allow for flexibility to accommodate innovation and changes in technological advancements and onsite circumstances. For example, building sizes may vary depending on the contractor selected and their specific configuration and selection of plant and processes, and ecological features may differ at the time of construction compared to what is known now.

To maintain flexibility in the design and layout at this stage in the process, the assessment of the Project, in accordance with the National Policy Statement for Water Resources Infrastructure ('NPSWRI', 2025), has adopted the Rochdale Envelope approach, as described in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope¹ (July 2018). This approach is "*employed where the nature of the Proposed Development means that some details of the whole project have not been confirmed (for instance the precise dimensions of structures) when the application is submitted, and flexibility is sought to address uncertainty.*" The Works Plans (Document reference 2.3, DCO Volume 2), which show the Order Limits, have been developed to reflect the level of flexibility required at this stage.

The use of the Rochdale Envelope¹ approach has been adopted to present an assessment of the likely significant environmental effects of the Project. More detail on the parameters used is presented in ES Chapter 3 Description of the Proposed Development, Volume I (Document reference 6.1, DCO Volume 6) and the Design Principles Document (Document reference 5.11, DCO Volume 5).

Application fee and documentation enclosed

The necessary fee required to accompany an application for Development Consent is £9,286.00. This has been paid to the Planning Inspectorate directly, via Bank Transfer (BACS), on the 29 April 2026.

The Application documents as listed in the Electronic Application Index (Document reference 1.5, DCO Volume 1) have been submitted electronically using SharePoint with the Electronic Application Index attached separately. This was agreed with the Planning Inspectorate prior to submission. The Applicant has also submitted alongside the

¹ Planning Inspectorate Guidance Nationally Significant Infrastructure Projects - Advice Note Nine: Rochdale Envelope July 2018

application an MS Word version of the Order together with an email confirming successful SI template validation.

The GIS Shapefile, outlining the Order Limits of the Project was shared with the Planning Inspectorate, via email, on the 30 April 2026.

The Section 55 Acceptance of Application Checklist (Document reference 1.4, DCO Volume 1) has been completed by the Applicant and has been included within the Application to assist with the Planning Inspectorate's compliance check.

Application formalities

This Application is made in the form required by Section 37(3)(b) of the PA 2008 and the Application documents comply with the requirements in Section 37 of the PA 2008 and those set out in all relevant legislation and guidance, including:

- The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations')².
- The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations')³.
- The Department for Communities and Local Government (now known as the Ministry of Housing, Communities and Local Government) Planning Act 2008 Application Form Guidance (June 2013).
- The Planning Inspectorate's Advice Page: Advice on the Preparation and Submission of Application Documents (January 2025).
- Ministry of Housing, Communities and Local Government, Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects, Guidance on the pre-application stage for Nationally Significant Infrastructure Projects (April 2024)

The Project is an Environmental Impact Assessment ('EIA') development and therefore the Application is accompanied by an ES, which includes Volume I, II and III (Document reference 6.1 – 6.3, DCO Volume 6) in accordance with the EIA Regulations³.

It is understood that, should the Application be accepted, the Application documents will be published on the Planning Inspectorate's website.

Habitats Regulations Assessment

The Application includes a Habitats Regulations Assessment – Stage 2 Appropriate Assessment and Marine Conservation Zone – Stage 1 Assessment (Document reference 5.2, DCO Volume 5). This report has been prepared in accordance with the Planning Inspectorate's Advice on Habitats Regulations Assessments (September 2024). This report identifies all relevant European sites potentially affected by the Project and sets out the screening undertaken for the purposes of The Conservation of Habitats and Species

² The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (SI 2009/2264)

³ Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (SI 2017/572)

Regulations 2017 and The Conservation of Offshore Marine Habitats and Species Regulations 2017 (the 'Habitats Regulations').

This report provides sufficient information for the SoS to undertake an appropriate assessment to determine whether the Project would have an adverse effect on any European sites.

Compulsory acquisition

The land over which the Applicant is seeking powers of compulsory acquisition of land, rights and interests, and powers of temporary possession under the Order for the purposes of the Project is listed in the Book of Reference (Document reference 4.3, DCO Volume 4) in accordance with Regulation 5(2)(d) of the APFP² Regulations². It is shown on the Land Plans (Document reference 2.2, DCO Volume 2) which have been prepared and submitted in accordance with Regulation 5(2)(i) of the APFP Regulations². The Statement of Reasons (Document reference 4.1, DCO Volume 4) provides details of, and justification for, the powers sought and the Pre-application Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4) provides details of negotiations to date.

Details of the availability of the necessary funding for compulsory acquisition and compensation are provided in the Funding Statement (Document reference 4.2, DCO Volume 4) which is submitted in compliance with Regulation 5(2)(h) of the APFP Regulations². The Funding Statement (Document reference 4.2, DCO Volume 4) also outlines the broader financial arrangements for the delivery of the Project.

Pre-application consultation

As required by Section 37(3)(c) of the PA 2008, a Consultation Report (Document reference 5.1, DCO Volume 5) accompanies this Application and details compliance with Sections 42, 46, 47, 48 and 49 of the PA 2008. These documents have been prepared in accordance with the relevant APFP Regulations² and the EIA Regulations³, including Regulation 12 and Regulation 13.

In accordance with Section 50(3) of the PA 2008, the Applicant has had regard to the Government's guidance on the PA 2008: Pre-application stage for Nationally Significant Infrastructure Projects (April 2024)^{Error! Bookmark not defined.} and the Planning Inspectorate's Advice on the Consultation Report (August 2024).

In accordance with Regulation 5(5) of the APFP Regulations², the Applicant retains all responses to the consultation carried out under Part 5 of the PA 2008 and can make them available at the request of the Planning Inspectorate and/or the SoS.

Other consents and licences

A summary of other consents and licences that are likely to be required, or may be required, in addition to those being requested as part of the Order in relation to the Project, is provided in the Other Consents and Licences Position Statement (Document reference 5.4, DCO Volume 5).

Sensitive Environmental Information

²The application contains sensitive environmental information, which is identified as 'Confidential' in Column C of the Electronic Application Index (Document reference 1.5, DCO Volume 1) and listed below. The documents do not include redacted versions, as the majority (or all) of the documents are sensitive environmental information. We understand that the Planning Inspectorate will not publish these documents due to their sensitive content.


- ES Vol II - ES Appendix 8.3 Badger (Document references 6.2, DCO Volume 6).
- ES Vol II - ES Appendix 8.5 Ornithology (Document references 6.2, DCO Volume 6).
- ES Vol III - ES Figure 8.12 Badger local record data within the desk study area (Document references 6.3, DCO Volume 6).
- ES Vol III - ES Figure 8.13 Badger survey results (Document references 6.3, DCO Volume 6).
- ES Vol III - ES Figure 8.34 Notable breeding bird habitat suitability survey in 2022, 2024 and 2025 (Document references 6.3, DCO Volume 6).
- 6.3 ES Vol III - ES Figure 8.35 Kingfisher breeding habitat suitability survey results (Document references 6.3, DCO Volume 6).
- 6.3 ES Vol III - ES Figure 8.36 Stage 2 and 3 barn owl survey results (Document references 6.3, DCO Volume 6).
- 7.14 Protected Species Licensing - 1 of 3 documents (Document references 7.14 DCO Volume 7).
- 7.14 Protected Species Licensing - 2 of 3 documents (Document references 7.14, DCO Volume 7).
- 7.14 Protected Species Licensing - 3 of 3 documents (Document references 7.14, DCO Volume 7).

In addition, parts of other documents have been redacted where necessary to remove any personal or financial data, in order to protect privacy and comply with data protection requirements.

Other matters

The Applicant has prepared Plans of statutory and non-statutory sites or features in accordance with Regulation 5(2)(l) of the APFP ²Regulations, (Document reference 2.7, DCO Volume 2) and Plans showing statutory or non-statutory historic or scheduled monument sites in accordance with Regulation 5(2)(m) of the APFP Regulations² (Document reference 2.8, DCO Volume 2).

As required under Regulation 5(3) of the APFP Regulations², all relevant Application plans, drawings or sections provided under Regulation 5(2) are no larger than A0 size, are drawn to an identified scale (not smaller than 1:2500) and, in the case of plans, show the



direction of North, with the exception of Plans of statutory and non-statutory sites or features (Document reference 2.7, DCO Volume 2) and Plans showing statutory or non-statutory historic or scheduled monument sites (Document reference 2.8, DCO Volume 2). These plans are not drawn to a scale smaller than 1:2500 as it would not be possible to view these sites alongside the Order Limits at this scale.

We have enclosed a number of draft Statements of Common Ground (SoCG) (Document reference 5.8, DCO Volume 5). It should be noted that the submitted draft SoCGs will continue to be updated throughout the Examination and final signed versions submitted at the appropriate Examination deadline.

The following documents do not include executive summaries (as recommended by the Planning Inspectorate's Advice Page: Advice on the Preparation and Submission of Application Documents) as they are of a technical nature and/or are not suited to summarisation:

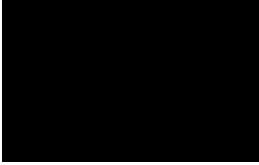
- Volume 1 application form and other related information (Document references 1.1 - 1.7, DCO Volume 1).
- Volume 2 plans and drawings (Document references 2.1 - 2.9, DCO Volume 2).
- Volume 3 documents, including the draft DCO (Document references 3.1 and 3.3, DCO Volume 3).
- Book of Reference (Document reference 4.3, DCO Volume 4).
- Pre-application Land and Rights Negotiations Tracker (Document reference 4.4, DCO Volume 4).
- Other Consents and Licences Position Statement (Document reference 5.4, DCO Volume 5).
- Draft Statements of Common Ground (Document reference 5.8, DCO Volume 5).
- Design Principles Document (Document reference 5.11, DCO Volume 5).
- Protected Species Licensing (Document reference 7.14, DCO Volume 7).

The Applicant will keep all Application documents under review and will endeavour to provide updates (where it considers it necessary to do so) during the Examination of the Application considering questions and comments received from the Examining Authority and Interested Parties.

Please note, a statement setting out the use of Artificial Intelligence (AI) in the preparation of submission documents is attached to this Application Cover Letter. The Applicant will provide additional statements as necessary where AI is used during Examination in the production of the Applicant's submissions.

I look forward to hearing from you in relation to the acceptance of the Application. If I can be of assistance, please do not hesitate to contact me at the details provided below.

Yours sincerely,



Ian Frost
Planning & Consents Lead, HWTWRP
[Redacted]@southernwater.co.uk

Use of Artificial Intelligence in preparation of submission documents

All outputs generated by Artificial Intelligence (AI) systems were subject to human review and carefully evaluated by the team before use.

| Submission document | Document reference | How AI has been used in the production of the document |
|---|---------------------------------------|--|
| Application Glossary | Document reference 1.7, DCO Volume 1 | Copilot was used to identify and collate abbreviated terms across submission documents to inform a draft abbreviations list. |
| Pre-application Land and Rights Negotiations Tracker | Document reference 4.4, DCO Volume 4 | Copilot was used to summarise the status of negotiations of voluntary agreements. |
| Planning Policy Statement | Document reference 5.5, DCO volume 5 | Copilot was used to prepare the executive summary which has been reviewed and refined by the report authors. |
| Case for the Project | Document reference 5.6, DCO volume 5 | Copilot was used to prepare the executive summary which has been reviewed and refined by the report authors. |
| Draft Statement of Common Ground - Hampshire County Council | Document reference 5.8, DCO Volume 5 | Copilot was used to summarise the positions of the stakeholder and the Applicant. |
| Draft Statement of Common Ground - Havant Borough Council | Document reference 5.8, DCO Volume 5 | Copilot was used to summarise the positions of the stakeholder and the Applicant. |
| Draft Statement of Common Ground - Winchester City Council | Document reference 5.8, DCO Volume 5 | Copilot was used to summarise the positions of the stakeholder and the Applicant. |
| Draft Statement of Common Ground - Portsmouth City Council | Document reference 5.8, DCO Volume 5 | Copilot was used to summarise the positions of the stakeholder and the Applicant. |
| Statement of Engagement | Document reference 5.9, DCO Volume 5 | Copilot was used for the purposes of collating meeting details in the appendices, and summarising meeting minute outcomes. |
| Scheme Development Report | Document reference 5.10, DCO volume 5 | Copilot was used to prepare the executive summary which has been reviewed and refined by the report authors. Copilot was also used as an assistive tool to proof read text prepared by the author. |
| ES Glossary and abbreviations | Document reference 6.1, DCO Volume 6 | Copilot was used to identify and collate abbreviated terms across Environmental Statement documents to inform a draft abbreviations list. |

| Submission document | Document reference | How AI has been used in the production of the document |
|---|--------------------------------------|---|
| Outline Landscape and Ecology Management Plan | Document reference 7.5, DCO Volume 7 | Copilot was used as an assistive tool to proof read text prepared by the author. |
| Outline Foundation Works Risk Assessment | Document reference 7.4, DCO volume 7 | Copilot was used to prepare the executive summary which has been reviewed and refined by the report authors. |
| Outline Carbon Management Plan | Document reference 7.8, DCO volume 7 | Copilot was used to prepare the executive summary which has been reviewed and refined by the report authors. |
| Outline Skills and Employment Plan | Document reference 7.9, DCO Volume 7 | Copilot was used to summarise relevant policy documents which are set out in the policy review section of the document. |

Copilot was used to produce reports for consistency checks across submission documents. Although the outputs were not used to create or substantially change submission documents, the AI outputs were used to inform manual checks. Any subsequent updates to documents were checked and manually made by the authors.