from Southern Water

Wendy McKay
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c/o Planning Inspectorate
National Infrastructure
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69 Buckingham Avenue
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Document Ref: 8.3

Dear Ms McKay,

Hampshire Water Transfer and Water Recycling Project – Applicant's Deadline 1 submission

Planning Inspectorate Application Ref: WA010002

This letter provides Southern Water Services Limited's (the Applicant) submission in support of the Hampshire Water Transfer and Water Recycling Project (the Project) at Deadline 1.

Deadline 1

The Applicant has set out below a list of documents submitted at Deadline 1:

Document title	Version	Reason for submission
New documents		
8.3 Applicant's Cover Letter for Deadline 1 Submission	-	This letter sets out the documents submitted by the Applicant at Deadline 1.
8.4 The Applicant's guide to responses to Relevant Representations	0	As requested by the Examining Authority in the Rule 8 letter - Notification of timetable for the Examination [PD-006].
8.5 The Applicant's responses to Relevant Representations from local authorities, parish councils, and statutory consultees	0	As requested by the Examining Authority in the Rule 8 letter - Notification of timetable for the Examination [PD-006].
8.6 The Applicant's responses to Relevant Representations from persons with an interest in land	0	As requested by the Examining Authority in the Rule 8 letter - Notification of timetable for the Examination [PD-006].

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Document Title	Version	Reason for submission
8.7 The Applicant's responses to Relevant Representations from members of the public and businesses	0	As requested by the Examining Authority in the Rule 8 letter - Notification of timetable for the Examination [PD-006].
8.8 The Applicant's responses to submissions at Procedural Deadline A	0	Responding to submissions from Interested Parties submitted at Procedural Deadline A.
8.9 The Applicant's written summaries of oral submissions at OFH1 and ISH1 and post hearing actions	0	Submitted as requested by the Examining Authority in the Rule 8 letter – Notification of timetable for the Examination [PD-008] and in response to the Examining Authority's Action Points from Issue Specific Hearing 1 (ISH1) [EV5-009].
8.10 The Applicant's draft itinerary for an Accompanied Site Inspection	0	Submitted as requested by the Examining Authority in the Rule 8 letter - Notification of timetable for the Examination [PD-006].
8.11 National Policy Statement Accordance Table	0	As requested by the Examining Authority in the Rule 8 letter - Notification of timetable for the Examination [PD-006]. Please note that the Applicant intends to provide a further updated version of the National Policy Statement (NPS) Accordance Table once Deadline 1 documents have Project Examination Library references. This is to ensure that the document is as helpful as possible in providing cross references (including hyperlinks) to where NPS policies are addressed across the application submission.
8.12 Draft Statement of Common Ground - Gosport Borough Council	0	Submitted as requested by the Examining Authority in the Rule 8 letter - Notification of timetable for the Examination [PD-006]. This document captures discussions with Gosport Borough Council and reports on progress in resolving matters since the application was submitted.
8.13 Draft Statement of Common Ground - National Highways	0	Submitted as requested by the Examining Authority in the Rule 8 letter - Notification of timetable for the Examination [PD-006]. This document captures discussions with National Highways and reports on progress in

Document Title	Version	Reason for submission
		resolving matters since the application was submitted.
8.14 The Applicant's response to ISH1 post hearing action 1(b) and 1(c)	0	Submitted in response to the Examining Authority's Action Points from Issue Specific Hearing 1 (ISH1) [EV5-009].
8.15 Schedule of Changes to the Book of Reference	0	Submitted to assist the Examining Authority by providing a consolidated list of all amendments to the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1) since the previous submission.
8.16 Statement of Commonality	0	Submitted to assist the Examining Authority by providing an updated overview of the extent of agreement across topic areas with stakeholders and to identify and track changes in the status of issues since the previous submission of a Statement of Commonality as appended to the Statement of Engagement [APP-072].
8.17 The Applicant's response to ISH1 post hearing action 1(a)	0	Submitted in response to the Examining Authority's Action Points from Issue Specific Hearing 1 (ISH1) [EV5-009].
Updated documents		
1.3 Guide to the Application	5	This document provides an updated list of documents submitted to the Examining Authority to date. It sets out the 'Status of the Applicant's examination documents' document (as requested by the Examining Authority in the Rule 8 letter - Notification of timetable for the Examination [PD-006])
2.2 Land Plans – 1 of 3 documents	2	As confirmed in the Applicant's Response to Section 51 Advice [AS-001] and requested by the Examining Authority in the Rule 8 letter - Notification of timetable for the Examination [PD-006], the Applicant made changes following a review of all of the Land Plans (Document reference 2.2, DCO Volume 2, Version 1) to ensure details are consistent with the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1). These changes include the addition of Ordnance Survey (OS) text to align with plot descriptions in the Book of Reference
2.2 Land Plans – 2 of 3 documents	2	
2.2 Land Plans – 3 of 3 documents	2	

Document Title	Version	Reason for submission
		(Document reference 4.3, DCO Volume 4, Version 1).
2.5 Crown Land Plans - 1 of 2 documents	1	As requested by the Examining Authority in the Rule 8 letter - Notification of timetable for the Examination [PD-006] as changes have been made. These changes include the addition of OS text to align with plot descriptions and the removal of a Crown interest following updates to the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1).
2.5 Crown Land Plans - 2 of 2 documents	1	
2.6 Special Category Land Plans	1	As requested by the Examining Authority in the Rule 8 letter - Notification of timetable for the Examination [PD-006] as changes have been made. These changes include the addition of OS text to align with plot descriptions in the Book of Reference (Document reference 4.3, DCO Volume 4, Version 1).
4.2 Funding Statement	1	To update the Project's estimated capital expenditure in line with the Applicant's RAPID Gate 4 Submission figures.
4.3 Book of Reference	1	As requested by the Examining Authority in the Rule 8 letter - Notification of timetable for the Examination [PD-006] as changes have been made. These changes are shown in the Book of Reference – Tracked Version (Document reference 4.3, DCO Volume 4, Version 1) and detailed further in the Schedule of Changes to the Book of Reference (Document reference 8.15, DCO Volume 8, Version 0).
4.4 Land and Rights Negotiations Tracker	1	As requested by the Examining Authority in the Rule 8 letter - Notification of timetable for the Examination [PD-006] as changes have been made. These changes provide an updated overview of the extent of land and rights negotiations since the previous submission.
5.2 Habitats Regulations Assessment – Stage 2 Appropriate Assessment and	2	Updated having regard to Relevant Representations and correcting of errors.

Document Title	Version	Reason for submission
Marine Conservation Zone – Stage 1 Assessment		
5.4 Other Consents and Licences Position Statement	1	Updated to reflect the status of pre-application engagement with the Environment Agency in respect of the abstraction licence for abstracting water from Havant Thicket Reservoir.
5.5 Planning Policy Statement	2	To update the section on national planning policy in light of the publication of the August 2026 National Planning Policy Framework (NPPF). Also reflects updated status on emerging local development plans since submission of the application.
5.6 Case for the Project	1	Correction of an error in the Executive Summary.
5.8 Draft Statement of Common Ground - Eastleigh Borough Council	1	Updated to capture discussions with Eastleigh Borough Council and report on progress in resolving matters between submission of the application and Deadline 1.
5.8 Draft Statement of Common Ground - East Hampshire District Council	1	Updated to capture discussions with East Hampshire District Council and report on progress in resolving matters between submission of the application and Deadline 1.
5.8 Draft Statement of Common Ground - Fareham Borough Council	1	Updated to capture discussions with Fareham Borough Council and report on progress in resolving matters between submission of the application and Deadline 1.
5.8 Draft Statement of Common Ground - Hampshire County Council	1	Updated to capture discussions with Hampshire County Council and report on progress in resolving matters between submission of the application and Deadline 1.
5.8 Draft Statement of Common Ground - Havant Borough Council	1	Updated to capture discussions with Havant Borough Council and report on progress in resolving matters between submission of the application and Deadline 1.
5.8 Draft Statement of Common Ground - Portsmouth City Council	1	Updated to capture discussions with Portsmouth City Council and report on progress in resolving matters between submission of the application and Deadline 1.
5.8 Draft Statement of Common Ground - South	1	Updated to capture discussions with South Downs National Park Authority and report on

Document Title	Version	Reason for submission
Downs National Park Authority		progress in resolving matters between submission of the application and Deadline 1.
5.8 Draft Statement of Common Ground - Winchester City Council	1	Updated to capture discussions with Winchester City Council and report on progress in resolving matters between submission of the application and Deadline 1.
5.8 Draft Statement of Common Ground - Environment Agency	2	Updated to capture discussions with the Environment Agency and report on progress in resolving matters between the Applicant's response to section 51 advice and Deadline 1.
5.8 Draft Statement of Common Ground - Marine Management Organisation	1	Updated to capture discussions with the Marine Management Organisation and report on progress in resolving matters between submission of the application and Deadline 1.
5.8 Draft Statement of Common Ground - Natural England	1	Updated to capture discussions with Natural England and report on progress in resolving matters between submission of the application and Deadline 1.
5.8 Draft Statement of Common Ground - Historic England	1	Updated to capture discussions with Historic England and report on progress in resolving matters between submission of the application and Deadline 1.
5.8 Draft Statement of Common Ground - Ministry of Defence	1	Updated to capture discussions with the Ministry of Defence and report on progress in resolving matters between submission of the application and Deadline 1.
5.11 Design Principles Document	1	Updated having regard to Relevant Representations and continued engagement with stakeholders.
6.1 ES Chapter 6 Air quality and odour	1	Updated to correct information referred to from ES Chapter 3 Description of the Proposed Development [APP-082].
6.1 ES Chapter 8 Terrestrial and freshwater biodiversity	1	Updated having regard to Relevant Representations and correcting of errors.
6.1 ES Chapter 9 Marine biodiversity	1	Updated having regard to Relevant Representations to correct referencing errors.
6.1 ES Chapter 11 Land quality and ground conditions	1	Updated to reflect revised document nomenclature in relation to ES Appendix 11.2.

Document Title	Version	Reason for submission
6.1 ES Chapter 17 Socio-economics, tourism and health	1	Updated having regard to Relevant Representations, correcting baseline data and adding mitigation measures.
6.1 ES Chapter 19 Water environment	1	Updated to reflect new modelling reported in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.1, DCO Volume 6, Version 1).
6.2 ES Appendix 5.5 Commitments Register	1	Updated to reflect changes made to mitigation measures.
6.2 ES Appendix 11.2 Geotechnical and geoenvironmental Reports – 6 of 18 documents	1	Updated to include groundwater sampling results in Appendix D for locations 3H4517SA and 3H4600SA.
6.2 ES Appendix 11.2 Geotechnical and geoenvironmental Reports – 8 of 18 documents	1	Updated to add ground investigation locations to Figures 1.1 and Figure 1.2, Section K Ground Investigation Locations with PSCs (Potential Sources of Contamination).
6.2 ES Appendix 11.2 Geotechnical and geoenvironmental Reports – 9 of 18 documents	1	Updated to include Phase 3 ground investigation soil sampling results to Appendix D and add ground investigation locations to Figures 1.1 and Figure 1.2, Section L Ground Investigation Locations with PSCs.
6.2 ES Appendix 11.2 Geotechnical and geoenvironmental Reports – 10 of 18 documents	1	Updated to add ground investigation locations to Figures 1.17 Section M Ground Investigation Locations with PSCs.
6.2 ES Appendix 11.2 Geotechnical and geoenvironmental Reports – 15 of 18 documents	1	Updated to move Figures 1.0, 1.1, 2.0, 2.1, 3.0 and 3.1 from Document 16 to Document 15.
6.2 ES Appendix 11.2 Geotechnical and geoenvironmental Reports – 16 of 18 documents	1	Updated to move Figures 4.0, 4.1, 5.0 and 5.1 from Document 17 to Document 16.
6.2 ES Appendix 11.2 Geotechnical and geoenvironmental Reports – 17 of 18 documents	1	Updated to move Figures 6.0, 6.1, 7.0, 8.0 and 8.1 from Document 18 to Document 17.
6.2 ES Appendix 11.2 Geotechnical and	1	Updated to add Figures 9.0, 10.0, 10.1, 11.0 to 11.5, 12.0 and 12.1 in Document 18.

Document Title	Version	Reason for submission
geoenvironmental Reports – 18 of 18 documents		
6.2 ES Appendix 19.2 Water Environment Regulations compliance assessment	1	Updated to reflect updated modelling reported in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (Document reference 6.1, DCO Volume 6, Version 1).
6.2 ES Appendix 19.11 Havant Thicket Reservoir water quality modelling	1	Updated to reflect updated modelling data.
6.3 ES Figure 6.4 Construction Phase Road Traffic Emissions - Ecological Receptors	1	Updated to correct error in geographical extent of the Figure.
7.1 Outline Construction Environmental Management Plan – 1 of 3 documents	1	Updated having regard to Relevant Representations to amend existing and include new mitigation measures.
7.5 Outline Landscape and Ecology Management Plan	1	Updated having regard to Relevant Representations.
7.6 Outline Written Scheme of Investigation	1	Updated to progress Statements of Common Ground and having regard to Relevant Representations.
7.9 Outline Skills and Employment Plan	1	Updated to align delivery structures as identified through stakeholder engagement.
7.13 Equality Impact Assessment	1	Updated to reflect the amendments made to health-related sections of ES Chapter 17 Socio-economics, tourism and health (Document reference 6.1, DCO Volume 6, Version 1).

The Planning Policy Statement has been updated to reflect the publication of the August 2026 NPPF, which includes important updates emphasising the importance of new water infrastructure. Other documents submitted at Deadline 1, which reference the 2024 NPPF, have not however been updated to reflect the 2026 NPPF at this stage.

The following draft Statements of Common Ground (SoCGs) have not been submitted at this deadline. The SoCGs are being progressed between the Applicant and parties listed below and are to be submitted by Deadline 2:

- Draft Statement of Common Ground – Portsmouth Water Limited
- Draft Statement of Common Ground – Network Rail Infrastructure Limited
- Draft Statement of Common Ground – Hampshire and Isle of Wight Wildlife Trust

Rule 8 letter - Notification of timetable for the Examination

The applicant acknowledges the contents of the Rule 8 letter - Notification of timetable for the Examination [PD-006].

Rule 8 letter - Notification of timetable for the Examination [PD-006] requests that the Applicant provides, at each deadline, an updated 'Status of the Applicant's examination documents' document. The Applicant confirms that the Guide to the Application (Document reference 1.3, DCO Volume 1) provides an update on the status of the Applicant's examination documents and will be updated and submitted at each deadline.

Procedural Deadline A (PDA)

The Applicant's responses to submissions at Procedural Deadline A (Document Reference 8.8, DCO Volume 8, Version 0) reviews the submissions made by Interested Parties at Procedural Deadline A and identifies how the matters raised have been addressed. It provides responses where new or additional matters require a response and, where matters have already been addressed elsewhere, signposts to the relevant responses or other examination documents. It also identifies submissions relating to procedural matters or Accompanied Site Inspection requests and signposts to the relevant Deadline 1 submission which addresses these points, where appropriate.

Open Floor Hearing 1 (OFH1) and Issue Specific Hearing 1 (ISH1)

The Applicant has submitted The Applicant's written summaries of oral submissions at OFH1 and ISH1 and post hearing actions (Document Reference 8.9, DCO Volume 8, Version 0). The document sets out the Applicant's written summaries of oral submissions made at the Open Floor Hearing 1 (OFH1) and Issue Specific Hearing 1 (ISH1). It also includes the Applicant's responses to the Action Points from Issue Specific Hearing 1 (ISH1) [EV5-009] and identifies whether responses are provided either within the document and its appendices or, where appropriate, in separate Deadline 1 submissions. The Applicant has not provided a written summary of its representations made at the Preliminary Meeting as procedural decisions have since been made in the Rule 8 - Notification of timetable for the Examination [PD-006] and Rule 17 - Request for further Information [PD-007].

Rule 17 - Request for further Information letter

The information provided both in response to Natural England's Relevant Representation [RR-222] (specifically RR-222-10) set out in The Applicant's responses to Relevant Representations from local authorities, parish councils, and statutory consultees (Document reference 8.5, DCO Volume 8, Version 0) and in the updated Habitats Regulations Assessment – Stage 2 Appropriate Assessment and Marine Conservation Zone – Stage 1 Assessment (the HRA; Document Reference 5.2, DCO Volume 5, Version 2) addresses the matters set out in the Rule 17 letter - Request for further Information [PD-007].

Requirement 17 of the Draft Development Consent Order (Draft DCO) [APP-023] provides the mechanism to secure delivery of the Solent Waders and Brent Goose mitigation. The HRA (Document Reference 5.2, DCO Volume 5, Version 2) has been updated for Examination Deadline 1 to include details relating to broad location and site selection as well

as the overarching mitigation approach. The mitigation mandated by Requirement 17 is set out in the HRA (Document Reference 5.2, DCO Volume 5, Version 2) in paragraphs 4.1.12 to 4.1.24 and includes a broad indication of the location of the proposed mitigation site, high level details of the management and monitoring regimes for the proposed mitigation site and confirms how the mitigation will be secured (via a Conservation Covenant). The timing of mitigation delivery in this case will follow the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended), which obligates the delivery of functional habitat in advance of the loss of the impacted habitat.

Work is ongoing in relation to this, but the full details cannot be shared due to commercial sensitivities. These measures will be fully developed through the production of a Habitat Management and Monitoring Plan, which will be subject to approval by the relevant Local Planning Authority in consultation with Natural England and ultimately secured through a Conservation Covenant.

Natural England has reviewed the mitigation approach and updated HRA and has confirmed agreement in principle, as set out in the draft Statement of Common Ground; (Document reference 5.8, DCO Volume 5, Version 1), specifically at NE-ES-001. The Applicant welcomes Natural England's comments in this regard.

Section 106 agreement

The Applicant is not intending to enter into a section 106 agreement to secure any required mitigations. The Applicant may, however, secure certain of the Project benefits described in section 4 of the Case for the Project (Document reference 5.6, Volume 5, Version 1) via legal agreement. The Applicant will be engaging with the relevant local planning authorities on the most appropriate securing mechanism for these benefits and will update the Examining Authority on this matter in due course.

Use of Artificial Intelligence

A statement setting out the use of Artificial Intelligence (AI) in the preparation of documents submitted at Deadline 1 is attached to this Cover Letter. Please note, for updated submitted application documents, this only applies to the updated parts of the document.

Please do not hesitate to contact me should you have any queries about our response.
Yours sincerely,

[redacted]

Planning & Consents Lead, HWTWRP
[redacted]**@southernwater.co.uk**

Use of Artificial Intelligence in preparation of Deadline 1 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	AI systems / tools used	How AI has been used in the production of the document
8.5 The Applicant's responses to Relevant Representations from local authorities, parish councils, and statutory consultees	Document reference 8.5, DCO Volume 8	Copilot	See section 2.2 of The Applicant's guide to responses to Relevant Representations (Document reference 8.4, DCO Volume 8, Version 0).
8.6 The Applicant's responses to Relevant Representations from persons with an interest in land	Document reference 8.6, DCO Volume 8	Copilot	See section 2.2 of The Applicant's guide to responses to Relevant Representations (Document reference 8.4, DCO Volume 8, Version 0).
8.7 The Applicant's responses to Relevant Representations from members of the public and businesses	Document reference 8.7, DCO Volume 8	Copilot	See section 2.2 of The Applicant's guide to responses to Relevant Representations (Document reference 8.4, DCO Volume 8, Version 0).
8.9 The Applicant's written summaries of oral submissions at OFH1 and ISH1 and post hearing actions	Document reference 8.9, DCO Volume 8	Legora and Copilot	Assisted with the initial preparation of written summaries of oral submission; those summaries have been checked by the speakers for accuracy, and in respect of the Open Floor Hearing summaries these have also been checked for accuracy against the transcript/recordings.
8.11 National Policy Statement Accordance Table	Document reference 8.11, DCO Volume 8	Copilot	Summarising National Policy Statement policy in the National Policy Statement Accordance Table (Document reference 8.11, DCO Volume 8, Version 0).