

FREEPOST - HAMPSHIRE WTWRP
CONSULTATION

By email to

HampshireWTWRP@southernwater.co.uk and

Enquiries to: [REDACTED]

Direct line:

Email [REDACTED]@havant.gov.uk

My reference:

Your reference:

Date: 18 April 2024

Dear [REDACTED]

Consultation on the Statement of Community Consultation (SoCC) for the Hampshire Water Transfer and Water Recycling Project (HWTWRP)

Thank you for the opportunity to comment on your draft SoCC as required under section 47 of the Planning Act 2008.

The Council would like to offer the following comments which we believe would improve the way Southern Water plans to engage the public on the Hampshire Water Transfer and Water Recycling Project (HWTWRP) proposals. These all relate to the proposed methods of consultation outlined in section 6 to 8 of the draft SoCC.

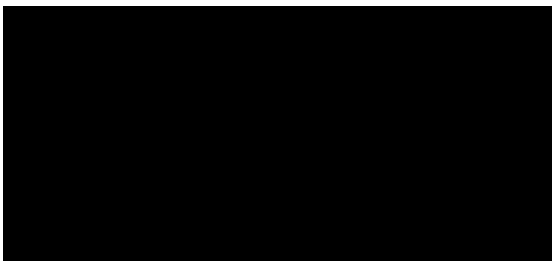
1. We note the proposals in the first table in section 8 to send letters and leaflets to stakeholders in consultation Zones A and B. We consider that this is too limited and recommend that all Southern Water customers – or at the very least those in consultation Zone D - should be individually informed of the consultation, by way of a letter or a summary leaflet as described in the table sent directly to customer addresses.
2. The proposed public consultation events to provide information on the consultation and give people the opportunity to talk to the Project team are welcomed. However, we suggest that a greater number and spread would be helpful, particularly in the Havant Borough area, which is the most affected by plant and pipe proposals.
3. We note the offer of 'meetings with local organisations' in the second table of section 8. This proposed method is welcomed by the council. However, the accompanying text which reads 'We will offer to present at meetings where local organisations already meet and a request is made' leaves it unclear as to how and when a request for Southern Water attendance at such a meeting would need to be made. As such there appears to be a danger that local organisations would not understand the requirements and would potentially miss the opportunity to request Southern Water's attendance at their meetings in time to fit in with the consultation period.

It is also unclear how a 'local organisation' is defined in this context. While the council welcomes a broad definition to allow a wide variety of groups potentially to make use of this method, we cannot be certain that the Southern Water's understanding of 'local organisation' is indeed a broad one. We would not wish any groups to read this part of the SoCC and assume they may be able to request a meeting, and for Southern Water later to refuse based on a narrower definition. Greater clarity is needed on this point.

4. It is noted that among the consultation materials will be a book of maps showing plans of the proposed pipeline routes and Above Ground Plant. No further detail is given in the SoCC as their scale or level of detail. The Council recommends that these should be detailed enough to fully identify potential impacts locally, at individual street level, rather than a broad project level overview. This could be achieved by publishing an online mapping resource as well as printed and pdf material.
5. Finally, in the context of the proposal that 'Stakeholders will also be advised of Southern Water's social media campaign and information on how to interact with its posts', the Council would like to reiterate its position previously expressed to Southern Water, that we do not intend to actively promote the consultation through our own social media channels. This is to avoid confusing the public on our role as a host authority and that of scheme promoter, Southern Water in the upcoming Development Consent Order process.

We trust that these comments are helpful in finalising your SoCC ahead of your pre-application consultation in the summer.

Yours sincerely



Executive Head of Place



Adequacy of Consultation Representation Proforma

Under *Section 55(4)(b) of the Planning Act 2008 (PA2008)* the Planning Inspectorate, on behalf of the Secretary of State, must take any adequacy of consultation representation (AoCR) received from a local authority consultee into account when deciding whether to accept an application for development consent, and this will be published should the application be accepted for examination.

An AoCR is defined in s55(5) in PA2008 as “a representation about whether the applicant complied, in relation to that proposed application, with the applicant’s duties under sections 42, 47 and 48”.

Project name	Hampshire Water Transfer and Water Recycling Project
Date of request	29 May 2026
Deadline for AOCR	12 June 2026
Return to	HampshireWaterProject@planninginspectorate.gov.uk

Please complete the proforma outlining your AoCR on the above NSIP.

Local Authority	Havant Borough Council
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In the opinion of the local authority, has the applicant complied with the legislative requirements listed below?

Please note that this is specifically about the statutory consultation(s) undertaken.

Assessment of Compliance - Required	
S42 Duty to consult	Yes
S47 Duty to consult local community	Yes
S48 Duty to publicise	Yes

If you would like to give more detail on any of the above, please do so below.

Please keep it as succinct as possible and refer to facts and evidence related to consultation, rather than the merits of the application.



Additional comments - <i>Not compulsory</i>	
S42 Duty to consult	<p>The applicant has consulted Havant Borough Council regularly during formal consultation periods prior to submission of the DCO application. However, this relates to consultation with the Borough Council only and the Borough Council provides no comment on consultation with third parties and whether the applicant has discharged its duty in this respect. During discussions with the Council, it was expressed to Southern Water that additional consultation should be undertaken with local residents/residents groups.</p>
S47 Duty to consult local community	<p>As set out above, the Council considers that the statutory test has been met. As set out to Southern Water in its initial response on the adequacy of consultation on 17 June 2025, the Council is not able to confirm whether or not the applicant undertook all of the activities exactly as described in the Statement of Community Consultation.</p> <p>In providing feedback on the Draft Statement of Community Consultation on 18 April 2024 (letter attached), the Council highlighted that further consultation should take place with local communities in addition to what was proposed, including providing letters and leaflets to Southern Water customers, ensuring local groups are fully consulted and ensuring that mapping was detailed enough to be able to fully identify potential impacts locally rather than a broad, project level overview. As such, it is possible that there were residents and stakeholders who were not aware of the consultation and may have engaged with it if they had been aware.</p>
S48 Duty to publicise	<p>The applicant has provided evidence to the Council of notices placed in local newspapers, the Times and the London Gazette.</p>
Any other comments	<p>Whilst not related to the adequacy of the consultation which took place, the Council would wish to highlight that there remains significant public concern over the approach of using recycled water and that this is highlighted in Southern Water's consultation report.</p>