

From: [Hampshire Water Project](#)
To: [REDACTED]
Cc: [Hampshire Water Project](#)
Subject: RE: Hampshire Waste Transfer Water Recycling Project - Adequacy of Consultation Review
Date: 12 June 2026 16:57:10
Attachments: [REDACTED]

Good afternoon

Thank you for your email and attachment.

The application above was submitted on 28 May 2026 and the acceptance decision must be taken on or before 25 June 2026. The decision will be published on the [project webpage of the National Infrastructure Planning website](#).

If the application is accepted, the following documents will also be published on the project webpage:

- The application documents (if they are not already published).
- Any Adequacy of Consultation Representations submitted by relevant local authorities.
- The Planning Inspectorate's acceptance checklist.

The acceptance tests

Section 55 of the Planning Act 2008 states that an application can be accepted provided:

- it is an application for an order granting development consent;
- that development consent is required for any of the development to which the application relates;
- the Applicant has, in relation to a proposed application that has become the application, complied with Chapter 2 of Part 5 (pre-application procedure); and
- that the application (including accompaniments) is of a standard that the Secretary of State considers satisfactory.

The following must be considered when making the decision:

- a) The Consultation Report received with the application
- b) Any Adequacy of Consultation Representations received by the Planning Inspectorate from a local authority consultee.
- c) The extent to which the Applicant has had regard to government guidance.

If you have sent comments about the **Pre-application consultation**, these can be considered in addition to the statutorily required acceptance tests when making the decision about whether or not to accept the application. However, it will be for the decision maker (the Planning Inspectorate on behalf of the Secretary of State) to decide the weight to give to the views expressed based on the individual facts of the case.

If you have sent comments about the **merits of the Proposed Development** (e.g. setting out support for, or objection to, the principle of the Proposed Development) these cannot be considered at the acceptance stage. Should the application be accepted for Examination you will be able to submit your comments as a 'Relevant Representation' and register as an Interested Party. Your comments must be submitted on the 'Registration and Relevant Representation form' which will be made available on the project webpage of the National Infrastructure Planning website at the appropriate time.

Further information about registering as an Interested Party can be found in the Planning Inspectorate's Advice for members of the public: [How to register to have your say and make a relevant representation](#).

You may find it helpful to subscribe to [Get updates](#) by email on the progress of the above application.

Kind Regards



Rammiel Burnie ()
Case Officer
Planning Inspectorate
Telephone: 0303 444 5201
www.gov.uk/pins

Ensuring **fairness**, **openness** and **impartiality** across all our services

This communication does not constitute legal advice.
Our [Customer Privacy Notice](#) sets out how we handle personal data in accordance with the law.

From: ()
Sent: 12 June 2026 15:47
To: Hampshire Water Project <HampshireWaterProject@planninginspectorate.gov.uk>
Subject: Hampshire Waste Transfer Water Recycling Project - Adequacy of Consultation Review

FAO: Mr Sheard

Dear Planning Inspector,
Hampshire Waste Transfer Water Recycling Project - Adequacy of Consultation Review

Please find attached a submission from the Water Matters community setting out information on the inadequacy of the consultation by Southern Water in regard to the HWTWRP.

The Water Matters community maintain that Southern Water has failed to meet the consultation requirements under section 42, 47 & 48 of the Planning Act 2008.

We write to support **and supplement** representations already made to the Inspectorate regarding the inadequacy of consultation by Rowlands Castle Parish Council, Suella Braverman MP and Save our South Coast Alliance, including failure to comply with the Gunning Principles.

We wish to **draw specific attention to a matter identified by the Inspectorate itself** in its Section 51 draft document review advice of 22 October 2025 (WA010002-000129) relating to item 24 of the draft DCO table, which the Inspectorate's has already identified as **potentially significant** . **This has not been raised in other inadequacy representations** we have seen but it adds still more weight to the conclusions of the RCPC and SOSCA representations that we support.

We ask that you review our submission with the supplementary concerns & information provided before determining the adequacy of consultation.

Yours sincerely,

()

On behalf of the Water Matters community

The 'Water Matters' community brings together residents' groups, long-established environmental charities, and retired experts in water industry operations and ground



**ADEQUACY OF CONSULTATION REPRESENTATION
TO THE PLANNING INSPECTORATE**
Hampshire Water Transfer and Water Recycling Project (HWTWRP)
Section 55(4)(b) of the Planning Act 2008
Representation by ‘Water Matters’
12 June 2026

1. Inadequacy of Consultation - General

We write to support **and supplement** representations already made to the Inspectorate regarding the inadequacy of consultation undertaken by Southern Water Services Limited (the “Applicant”), including those made by;

Rowlands Castle Parish Council (RCPC), the council in whose area half of the Havant Thicket Reservoir is located) 9 June 2026,

Suella Braverman MP 11 June 2026, and

Save Our South Coast Alliance (SOSCA) 9 June 2026

We adopt and agree with those representations regarding the failure of the Applicant to consult adequately with affected parties including;

- **Those engaged as consultees for the original Havant Thicket Reservoir planning permission** granted under the Town and Country Planning Act (“TCPA”) in October 2021. Many of whom are members of the Water Matters community, and
- **Residents across large parts of West Sussex and Hampshire whose drinking water supply will originate from the repurposed reservoir** under the Applicant’s scheme, including Portsmouth Water customers.

Portsmouth Water confirm on their website; “if the HWTWRP is implemented, Portsmouth Water customers would receive a mixture of spring water and recycled water from Havant Thicket Reservoir in drought and emergency conditions – such as, if we, or Southern Water, were not able to use our regular sources of water due to an engineering or other issue. For example, the loss of a treatment works because of technical problems, or damage to a trunk water main that supplies many customers.”..... “recycled water could be used more frequently as a source for Portsmouth Water customers from 2040 and beyond”. [Frequently Asked Questions | Havant Thicket Reservoir and water recycling | Havant Thicket Reservoir project](#)

This **use of recycled water to fill the reservoir represents a material change in the supply of water for Portsmouth Water customers** from a chalk spring water fed reservoir, in line with the original planning consent, to a source manufactured from treated sewage effluent.

A change for which there has been no consultation with Portsmouth Water customers at the formative stage of the project, even though customers were likely to be affected. A clear breach of the Gunning Principles.

2. Article 47 - Modification of the Havant Thicket Reservoir Planning Permission

We wish to draw specific attention to a matter identified by the Inspectorate itself in its Section 51 draft document review advice of 22 October 2025 (WA010002-000129)¹. This has not been raised in other inadequacy representations we have seen but it adds still more weight to the conclusions of the RCPC and SOSCA representations that we support. At item 24 of the draft DCO table, the Inspectorate noted:

“Article 47 - Seeks to modify the Havant Thicket reservoir planning permission but is blank. The Inspectorate would have welcomed being given sight of this prior to submission of the application, as it is presumed to be novel and could have led to significant advice.”

The Inspectorate’s own advice therefore already identifies this provision as **potentially significant**. We submit below – in light of the other inadequacy of consultation submissions – (a) that the significance of the so-called *modification* to the “Havant Thicket reservoir planning permission” is even more fundamental, and needs to be considered by the Inspectorate at this Acceptance stage, and (b) that the lack of any drafting in Article 47 is even more *conspicuous by its absence* than the Inspectorate had appreciated.

The Havant Thicket Reservoir 2021 TCPA planning permission was sought, consulted on and granted specifically on the basis that the reservoir would be a “development of a reservoir for raw water storage...”(Appendix A). “Raw” water means water that comes straight from nature and has not been treated in any way. Raw water is very different from recycled water (i.e. which in the Applicant’s scheme is manufactured by advanced treatment of final effluent from the Budds Farm sewage works). Specifically, the 2021 TCPA permission was sought, consulted on and granted on the basis that the reservoir would be filled with raw water from a chalk spring source. With the application documents specifically confirming that the source of the raw water to fill the reservoir would be from Portsmouth Water’s natural springs at Havant & Bedhampton (Appendix A, page 8).

The core of the HWTWRP scheme depends on changing the fundamental basis of the 2021 TCPA permission from being “a reservoir for raw water storage” to being a reservoir that will **receive and store treated recycled effluent**.

Parties who engaged as consultees with that original 2021 TCPA process - including Rowlands Castle Parish Council - did so on the basis that the reservoir would only be filled with raw water, supplied from chalk springs. This was fundamental to deliberations and support from the community including councillors on the Planning Committee at the time. Clearly, it would have been a legitimate expectation of those original consultees (such as RCPC) that if there was ever a proposal to change the core specification of the Havant Thicket reservoir they would be meaningfully re-consulted. They were not.

Indeed, they were not consulted even though the written Supplementary Information provided to the LPA planning committees in 2021 confirmed any such change of use would require a separate planning application and thus further consultation.

¹ Which also includes a “Draft dDCO explanatory memorandum” (“**Explanatory Memorandum**”), which we assume are the Applicant’s explanations and footnotes in their draft DCO. Please note we have not seen or reviewed the draft DCO commented upon by PINS.

*“Concerns that the public have been misled regarding the whole project, as Southern Water are currently consulting on alternative uses in its Water for Life documentation, which includes a new pipeline from the Site to WWtW at Otterbourne, and the **potential for the reservoir to be filled with ‘recycled water’ from Budds Farm.***

*Planning Officer Written Comment: The document is currently a consultation being undertaken by Southern Water to explore schemes to address predicated water shortages in its region, this is a consultation document only which does not impact on the current planning applications before the LPA’s. In addition, **any change in use of the reservoir would require planning permission, which would need to be accompanied by an Environmental Statement, Water Framework Directive, and Habitat Regulation Assessment.** “*

Had that written assurance not been provided it was doubtful that the Havant Borough Council Planning Committee would have voted to grant consent for the reservoir, such was the local opposition to any proposal for recycled effluent to be used to fill the reservoir as a backup solution to Fawley desalination.

It is apparent from the other inadequacy representations that *affected persons* (such as those originally consulted on the 2021 TCPA permission) were not consulted by the Applicant, either under Chapter 2 of Part 5 of the Planning Act 2008 or under the Water Industry Act, on the question of allowing the fundamental characteristic of the existing permission to be materially changed to allow the reservoir to receive and store treated recycled effluent.

As proposed, there can be no HWTWRP without fundamental change to the core specification and operating basis of the Havant Thicket reservoir. This goes to highlighting a related consultation failure by the Applicant: the Applicant did not fully consider or consult on potential alternatives to the repurposing of the reservoir (e.g. a bespoke new environmental buffer lake between Havant and Otterbourne, a river discharge such as to the Hamble or Wallington, or discharge to an aquifer, as is used in international effluent recycling schemes).

In short, the Applicant’s proposed repurposing of the reservoir is at the operational core of the HWTWRP scheme. Without the repurposing of the reservoir, the scheme cannot proceed and, **yet**, key consultees for the 2021 TCPA permission have not been consulted. Nor did the Applicant consider or propose alternatives for proper consultation.

Furthermore, the Explanatory Memorandum (to the Inspectorate’s note mentioned above) noted at paragraph 12.19 that Article 47 was blank because the Applicant was still awaiting agreement of the s106 conditions relating to the reservoir before it could determine which conditions to modify. **It is now clear, as explained above, that the proposed changes to the Havant Thicket Reservoir permission are fundamental and, in our submission, go beyond what can be dealt with by way of such variation of a condition.**

Moreover, the absence of this drafting also evidences that at the time the statutory pre-application consultation was conducted for the HWTWRP, the Applicant had not identified - and therefore had not consulted upon - the 2021 TCPA permission that it now seeks to fundamentally change. As mentioned above, Article 47 of the dDCO was conspicuous by its absence. How can the Applicant legitimately claim to have adequately consulted when the core part of its proposal was completely absent from its own dDCO drafting? **It is our submission that the Applicant hadn’t even directed its own mind properly to the implications of the repurposing of the reservoir; therefore, how could it have expected the public to have done so?**

3. Grounds for Non-Acceptance

Section 55(3)(e) of the Planning Act 2008 provides that the Inspectorate may only accept an application if the Applicant has complied with Chapter 2 of Part 5. The **failure to consult those affected by the proposed modification of the 2021 TCPA reservoir planning permission**, on the substance of that modification, is a failure to comply with those requirements.

We submit that on this ground alone the application should not be accepted.

4. If the Inspectorate is Minded to Accept

If, contrary to our submission above, the Inspectorate is minded to accept the application, we invite the Inspectorate to state explicitly in its acceptance decision letter that:

- (a) the adequacy of pre-application consultation on the proposed modification of the Havant Thicket Reservoir planning permission remains a live and unresolved issue; and
- (b) the question of whether the reservoir should be repurposed to receive recycled effluent — and the fundamental modification of the 2021 TCPA permission required to achieve that — is not foreclosed and remains open for examination; and
- (c) *affected parties*, including those who were consultees for the original 2021 TCPA reservoir permission and including those who will be affected by the operational repurposing of the reservoir, such as those whose drinking water will be supplied from it, retain the right to argue at examination that the reservoir should not be repurposed as proposed, and that such arguments must be fully considered by the Examining Authority even if their success would render the scheme unviable.

5. Conclusion

The Water Matters community maintain that Southern Water has failed to meet the consultation requirements under section 42, 47 & 48 of the Planning Act 2008.

We submit that the application should not be accepted for examination for the reasons set out above, but also including those made in other inadequacy submissions made by RCPC, Suella Braverman & SOSCA. Specifically we endorse the information set out in the Inadequacy of Consultation report submitted by RCPC.

We would particularly highlight SOSCA's explanation as to why the Inspectorate must apply the **Gunning Principles** in exercising its Acceptance determination under the Planning Act 2008.

We submit that alternatives to repurposing the reservoir as the environmental buffer for recycled effluent project were not properly considered, and not consulted on at the formative stage of the project.

Nor were those 'likely to be affected' by the material change to their water supply consulted.

The Article 47 issue identified by the Inspectorate highlights the lack of diligence and proper consultation by the Applicant on a core part of its scheme (as currently proposed).

The consultation failure in respect of the proposed modification of the 2021 TCPA reservoir planning permission is a substantive and material defect that goes to the heart of this application and needs to be addressed at this Acceptance stage.

If, notwithstanding the above, the Inspectorate is minded to accept the application, it should make clear in its acceptance decision that the question of the repurposing of Havant Thicket Reservoir remains fully open at examination.

Tracey Viney

On behalf of the Water Matters community

The 'Water Matters' community brings together residents' groups, long-established environmental charities, and retired experts in water industry operations and ground contamination. Our concerns about effluent recycling are backed by a broad cross-section of parish and borough councillors.

12 June 2026

Appendix A

Information on the original TCPA spring fed reservoir planning application

Application submitted to, considered by, and approved by East Hants District Council (EHDC) and Havant Borough Council (HBC) as the relevant Local Planning Authorities.

EHDC application reference: [REDACTED] Permission granted: 15 October 2021

HBC application reference: [REDACTED] Permission granted: 15 October 2021

Description of Development

Proposal: Hybrid application seeking:

1) Full Planning permission for **Development of a reservoir for raw water storage**, A pumped storage reservoir, with the minimum required total storage capacity of 8,700 million litres (Ml), to support the planned bulk supply transfer of at least 21Ml/d in extreme (currently defined as 1:200 year) drought conditions; Construction of an earth embankment adjacent to Staunton Country Park ; Construction of an overflow discharge/spillway at the south-western side of the reservoir and associated works; Construction of a new junction on the B2149 Manor Lodge Road and a new junction on Swanmore Road. Provision of viewing areas on the southern embankment and western edge of the reservoir.

2) Outline application for (matters to be considered outlined in Table 2.2 in the submitted Development Specification) control house partially incorporated within landscaped earth mounding adjacent to the south west embankment; together with provision of other earth embankments. Construction of a visitor centre / cafe, with storage areas and welfare facilities to the northwest of the reservoir to be used for recreational and education purposes; Provision of picnic area(s) and children's play area(s). Access routes from both junctions to the visitor car park; visitor car park comprising 193 car parking spaces and between 70 and 75 overflow spaces plus spaces for staff, coach/minibus and disabled drivers sited to the north west of the reservoir. Creation of a permanent wetland on the northern side of the reservoir and construction of bird watching hide/screen(s); recreational facilities for public amenity. Provision of perimeter tracks and a network of bridleways, cycle paths and footpaths; Construction of a slipway on the western bank of the reservoir for operational use only and a small section of the proposed pipeline (210m).

Note: There was a separate planning application approved at the same time by HBC for a pipeline **to carry spring water from Bedhampton** to the reservoir site. We believe **that application will also need to be materially changed to allow the pipes to carry recycled effluent to and from the reservoir.**

Prior to the Planning Committee on 3 June the Planning Officer provided the following clarification on the matter of a potential future option to fill the reservoir with recycled water (recycled effluent).

Extract of Supplementary Information for Planning Committee – Update 3/6/21 – Item 6

*“Concerns that the public have been misled regarding the whole project, as Southern Water are currently consulting on alternative uses in its Water for Life documentation, which includes a new pipeline from the Site to WWTW at Otterbourne, and the **potential for the reservoir to be filled with ‘recycled water’ from Budds Farm.***

*Planning Officer Comment: The document is currently a consultation being undertaken by Southern Water to explore schemes to address predicated water shortages in its region, this is a consultation document only which does not impact on the current planning applications before the LPA’s. In addition, **any change in use of the reservoir would require planning permission, which would need to be accompanied by an Environmental Statement, Water Framework Directive, and Habitat Regulation Assessment.** “*

Had that written assurance not been provided it was doubtful that the Havant Borough Council Planning Committee would have voted to grant consent, such was the local opposition to any proposal for recycled effluent to be used to fill the reservoir as a backup solution to Fawley desalination.

Extracts of documents that form a part of the approved Havant Thicket Reservoir

Condition 3 of the planning permission for the original reservoir states;

The development hereby permitted shall be carried out in accordance with the following approved plans: (selected examples only below)

Planning Statement

Development Specification

Environmental Statement (only considered the impact of spring water on the reservoir environment, downstream water courses and Langstone Harbour SPA, SAC, SSSI, as did the Habitats Regulation Assessment)

Engineering and Design Report

Statement of Community Involvement

Outline Biodiversity Mitigation and Compensation Strategy

All of these documents and others would need to be revised and resubmitted for the material change proposed by Southern Water in order to use recycled effluent to fill the reservoir. These **documents specifically referred to the storage of ‘raw’ water and filling with chalk spring water**, see example extracts below.

Development Specification

Section 1.1 states; This **Development Specification forms part of the outline planning application submissions** for a proposed new reservoir and pipeline (the Scheme) at Havant Thicket, Havant.

Chapter 2 of this Development Specification defines and describes the principal components of the Scheme for which permission is sought.

2.5 Planning permission is being sought for: Development of **a reservoir for raw water storage**, with control house, visitor centre and car park, recreational facilities for public amenity and a wetland along the northern shore of the reservoir.

Page 4; We're able to do this as our supply area is only under 'moderate water stress' – mainly due to the **underground springs, most notably at Bedhampton and Havant**, which provide plentiful, reliable supplies of very clean water. In winter, much of this water is surplus to our requirements and flows out to sea so we can make much better use of it regionally **by capturing it and storing it in the reservoir** until it's needed.

2.7; Planning permission is being sought for: Development of a new pipeline to **transfer water from Bedhampton Springs to fill the reservoir in the winter** and draw it off to treat and supply when needed in the summer.

2.10. The key elements of the proposed construction sequence are indicated in Table 2.1:

Table 2.1: Indicative Construction Programme

Dates	Key activity / milestone
Spring 2021	Planning permission expected
Spring 2021 – November 2022	Commencement of works. Species relocation, tree felling, preparatory work on habitats avoiding breeding / nesting seasons, enabling works including access road construction.
March 2023 – September 2026	Construction of culvert structure, embankment and reservoir control house
Autumn 2026 – Spring 2029	Construction of visitor facilities. Filling of reservoir in stages with pumped water from Bedhampton Springs. Testing and commissioning.

Planning Statement

Page 6 states; “The Scheme The reservoir, when constructed, will **be filled with surplus water drawn from the springs at the Bedhampton works** when flows are at their highest in winter via a new combined inlet/outline pipeline, and will provide water supplies to Portsmouth Water customers in the summer months as required.”

Page 8; Overall, the Scheme would also result in substantial reductions in nutrients loads (particularly nitrates) to the internationally protected Chichester and Langstone harbour from the Hermitage Stream catchment (including the flows from the Bedhampton and Havant Springs).

Page 9, Section 1.5; The reservoir, when constructed, will be **filled with surplus water drawn from the springs at the Bedhampton works** when flows are at their highest in winter via a new combined inlet/outline pipeline, and will provide water supplies to Portsmouth Water customers in the summer months as required.

Page 13, Section 2.1; The 'Scheme' includes the reservoir at Havant Thicket and the **pipeline connecting to Bedhampton Springs**.

Page 18, Section 3.9; Planning permission is being sought for: "Development of a new pipeline to **transfer water from Bedhampton Springs to fill the reservoir** in the winter and draw it off to treat and supply when needed in the summer".

Page 42, 5.114; This project is fundamentally sustainable for the following reasons: The excess **clean spring water that would otherwise flow out into the sea can now be captured and stored in the reservoir** until it is required to supply Portsmouth Water's customers and the surplus can be shared with Southern Water's customers in West Hampshire;

It is clear in the supporting documents to the Planning Application, which now form part of the approved scheme, that the new Havant Thicket Reservoir was to be filled with natural chalk spring water.

This is what the environmental impact was based on. A key advantage of the project was that it would create the first chalk spring fed reservoir anywhere in the world. A **unique biodiversity opportunity and selling point with stakeholders and the local community**. The HWTWRP results in the loss of this unique opportunity.