From:	[redacted]
To:	Hampshire Water Project
Subject:	Registration to speak at hearings - supporting documents & confirmation of speakers with WMC support
Date:	01 November 2026 18:38:40
Attachments:	November Hearing Agenda Topics_WMC_Final_1_Nov_2026.pdf

HWTWRP - WA010002 – Examination Process

Water Matters Community Submission for 2/11/12 deadline

PINS registration identification number is: [redacted]

Dear sir/ madam,

I can confirm that I have registered the following to speak on behalf of the Water Matters Community using your online portal.

PM 11/11/26 am – Tracey Viney – to attend in person and speak on Items 3, 4 & 6

OFH 11/11/26 pm- Tracey Viney to attend in person, not to speak

ISH 12/11/26 – Water Environment – Tracey Viney to attend in person and speak on item 3 & 4

ISH 12/11/26 – Water Environment – Professor Alex Ford to attend in person and speak on item 3 *(please note that Alex will have to leave at 2.30 due to another commitment, so we request that he is called to speak by the ExA before 2.00)*

As community groups/ organisations with common concerns we have come together to make a written representation in advance of the hearings and to nominate representative speakers to cover specific topics and concerns, as requested in the Rule 6 letter (Annex B, page B6). Having "come together" in the manner encouraged, we would ask the ExA to provide the spokespersons nominated by the WMC et al with "an additional time allowance, recognising their representative role" (Annex B, page B6).

Our written representation submitted on matters to be covered at the hearings is attached, this includes information on the topics our spokespersons will speak on.

In addition, I wish to confirm the Water Matters Community support for the following speakers.

PM 11/11/26 am – Andrew Newberry (Technical Advisor representing SOSCA)

PM 11/11/26 am – Pat Brooks (representing Havant Friends of the Earth & Havant Climate Alliance)

OFH 11/11/26 pm – Bianca Car (Technical Advisor representing SOSCA)

OFH 11/11/26 pm – Chris Stanley (Chairman Rowlands Castle Parish Council) *– please note that Chris will not be available until 3.30 due to a previous commitment, we request that he is called to speak by the ExA at or after 3.30, if the meeting will close before he can join online then Tracey Viney will speak on his behalf, but our strong preference is for Chris to be able to speak on behalf of the residents of Rowlands Castle and the wider community.*

ISH 12/11/26 – Beth Hawdon (Ecotoxicologist)

ISH 12/11/26 – Andrew Newbery (Technical Advisor to SOSCA)

Highlighting missing information

The WMC Relevant Representation (RR-354) identified information and documentation

that was missing or needed to be provided by the Applicant in order to enable an informed assessment by the ExA on a large number of relevant matters. This information and documentation is still missing.

We formally request that the ExA requires the Applicant to provide the information and documentation identified in **APPENDIX A**. To help the ExA we have consolidated the information and documentation gaps under key subject headings in APPENDIX A attached.

Separate emails will be sent to you in relation to;

- A WMC document proposing locations for site visits by the ExA, in winter at hightide, daytime and after dark.
- Supporting background documents to topics being raised at the hearings for inclusion in the Examination Library.

I hope that this provides all of the information you need to confirm our registrations for the hearings. If you have any questions, please do not hesitate to contact me.

Yours sincerely,

[redacted]

On behalf of the Water Matters Community

1.11.26

HWTWRP - WA010002 – Examination Process

Water Matters Community Submission for 2/11/12 deadline

PINS registration identification number is: [redacted]

The following submission from the Water Matters Community (WMC) is supported by Rowlands Castle Parish Council, Save Our South Coast Alliance (SOSCA), Havant Climate Alliance, Havant Friends of the Earth and Andrew Newbery. As community groups/ organisations with common concerns we have come together to make a written representation in advance of the hearings and to nominate representative speakers to cover specific topics and concerns, as requested in the Rule 6 letter (Annex B, page B6).

		Page number
Section 1	Preliminary Meeting, 11/11/26 am	2
Section 2	Open Floor Hearing 1, 11/11/26 pm	14
Section 3	ISH1, Water Environment, 12/11/26	15
APPENDIX A	Regarding procedural request to ExA, under PM, Item 6.3 to direct Applicant to provide missing information and documentation.	16

Note: A separate document will be submitted setting out the locations that WMC request the ExA visit in order to understand the concerns raised by the community.

The Water Matters Community Representation made in August 2026 on the HWTWRP DCO application was supported by 2,574 people or organisations including; 2 Peers, 2 local MP's, 25 Councillors and Parish Councillors, retired environmental health professionals, retired water industry specialists and reservoir stakeholders.

Declaration of the use of artificial intelligence (Rule 6 letter, Annex F, decision 1)

Members of the Water Matters Community used Claude (an AI assistant made by Anthropic) in preparing this submission, as follows.

Claude was used to (a) locate and check references to documents, paragraphs and page numbers; (b) extract and tabulate agenda items, topics and speakers from the Community's own draft; and (c) carry out general administrative tasks such as formatting.

All content has been reviewed and checked against the source documents.

Section 1 - Preliminary Meeting – 11/11/26 (AM)

We make submissions below on each of the following agenda items for the Preliminary Meeting: Items 3, 4, 5 and 6.

For clarity of the explanation in our submission, we have split our submissions on PM, agenda Item 3 into two parts.

- In section 3a we set out some additional matters that are of significant concern to the community and ask that further consideration be given to whether these should be identified as Principal Issues.
- In section 3b we propose additional sub-headings (bulleted items) that we request the ExA include under each Principal Issue topic.

Item 3 (PM)

The Examining Authority (ExA) has published their Initial Assessment of Principal Issues (PI) in Annex C. The Water Matters Community (WMC) welcomes the broad range of issues identified in Annex C.

In the text before the Annex C table the ExA confirms that;

- It is not a comprehensive or exclusive list of the issues that will be subject to examination.
- The bulleted items under each issue are indicative and do not preclude other sub items being considered.

As noted above, for clarity of the explanation in our submission, we have split our submissions on PM, agenda Item 3 into two parts: Item 3a, which deals with our suggestions for additional PIs; and Item 3b which suggests additional subheadings under the already identified PIs.

Item 3a (PM) – Initial Assessment of Principal Issues (Annex C)

We request the ExA to include the following additional topics as PIs:

1. **Improper consultation before the HWTWRP option was selected in 2021;**
   The Applicants failure to consult those likely to be affected and take account of their views at the formative stage is an issue of principal concern to the local community (RR-354 Section 2).
   - We draw the ExA attention to the significant and wide range of concerns set out in the 'Inadequacy of Consultation Report' submitted by Rowlands Castle Parish Council (WA010002-000723), including the failure to follow the Gunning Principles and statutory consultation process set out under the Water Industry Act 1991 (Section 37), to ensure that those likely to be affected are consulted when a water company plan materially changes, as the Applicants plan did in late 2021. With

additional concerns set out in the WMC submission on 12 June 2026 (WA010002 /s51advice/ 100000323). Including the failure to meet the consultation requirements under section 42, 47 & 48 of the Planning Act 2008 which applied at the time.

- Information on the communities' concerns will be highlighted at the Open Floor Hearing on the 11/11/26 (pm) by the Chairman of Rowlands Castle Parish Council, in whose area the Havant Thicket Reservoir is located, yet who were not consulted on the HWTWRP and alternatives before the scheme was selected.
- The **WMC fully support the oral representation being made by Chris Stanley on 11/11/26 (pm)** on behalf of Rowlands Castle Parish Council and the wider community.
- The community ask that if Improper Consultation and failure to follow the statutory process is not to be made a Principal Issue that the ExA confirm that it will be considered during the examination.
- **As a minimum the community would request that an additional sub-heading is added to the Alternatives PI** to examine "Whether reasonable alternatives were developed and consulted on at the formative stage, before the HWTWRP option was selected in 2021, as NPSWRI 3.5 and the EIA regulations require (RR-354 sections 1a and 14b).

2. **Gaps in the regulatory framework and concerns about the lack of independent audit and control** is an issue of principal concern to the local community (RR-354 Section 6). The WMC request that the adequacy of the current regulatory framework available to control the specific effects/ risks of this scheme on people and the environment be examined as a Principal Issue, and that an Issue Specific Hearing be held on it. Including consideration of the securing mechanisms for the controls necessary to address the risks. Specific issues to be considered would include.
   - What risks the existing regulatory framework can and cannot control? For example; can it control discharges in relation to salinity, temperature and the standard of remineralisation (geochemistry) needed to prevent any adverse effect on water quality and ecology compared to the chalk spring water fed reservoir? What contaminants of emerging concern including Transformation Products can't it control?
   - Whether the Applicant's proposed mechanisms are adequate to control the risks the existing regulatory regime cannot? (e.g. discharge-parameter conditions for contaminants with no Environmental Quality Standard, remineralisation standards to match the exiting spring water and a minimum residence time)
   - How to ensure the same level of independent expert audit and control required in other countries using effluent recycling can be applied to the HWTWRP, including how to ensure enforceable controls are in place. Whether these can be secured by requirement/ condition or need separate agreements with regulators and LPAs. *Note: The controls the Community seek found in other countries using effluent recycling include regular expert independent audit of plant and monitoring data with reporting to local authorities and public health officials, and an ongoing programme of risk assessment and sewer catchment hazard control.*

As a minimum the community would request that the Water Environment PI is expanded to remove the words "ensuring regulatory compliance" and to replace them with; "whether the existing regulatory regimes, together with the controls in the dDCO, are capable of controlling the specific risks of the scheme, including contaminants with no Environmental Quality Standard (EQS), and whether further controls, including independent audit, are needed and can be secured." Compliance with a permit that does not cover substances of concern says nothing about that substance's risk.

3. **Carbon and energy impacts** from a scheme which requires a significant amount of energy to both treat and transfer water via multiple pipelines is an issue of principal concern to the local community (RR-354 Sections 14 & 15).
   - Information on the communities' concerns will be highlighted at the Preliminary Meeting on the 11/11/26 (am) by Pat Brooks on behalf of Havant Climate Alliance, Havant Friends of the Earth and the wider community.
   - The **WMC fully support the oral representation being made by Pat Brook**, in which she will request that Carbon and Energy Impacts are included as a PI in the examination.

Item 3b (PM) – Principal Issues – Additional sub-headings requested

In this section the WMC propose additional sub-headings (bulleted items) that we request the ExA include under each Principal Issue (as identified in the Rule 6 letter, Annex C) set out below (labelled C1 to C11). These relate to matters raised in the WMC Relevant Representation (RR-354) which we consider important to the examination of topics selected by the ExA as Principal Issues.

C1 Alternatives

WMC request the following sub-headings are added to the matters to be considered under this Principal Issue.

i. Whether Schedule 4(2) of the EIA Regulations and NPS-WRI section 3.5.1 were met including in relation to consideration of alternatives? (RR-354, Section 1a)
ii. Specifically whether reasonable alternatives were developed and consulted on at the formative stage, before the HWTWRP option was selected in 2021, as NPSWRI 3.5 and the EIA regulations require.
iii. Whether reasonable alternatives (including combinations of demand management and water-resource options) were prepared to an adequate level of detail by the applicant, so that they could be considered on a comparable basis at the formative stage before the HWTWRP was selected (RR-354, Section 1a,i, iv, vi & Section 14b)
iv. Whether alternative environmental buffers were adequately considered and assessed? (RR-354, Section 1b)
v. Whether the alternative site assessment process for the location of the Water Recycling Plant and associated infrastructure which took place before and after Site 72 was selected was adequate and robust (RR-354, Section 3)

vi. Whether a robust comparison has been undertaken of the carbon impact of HWTWRP[1] compared to reasonable alternatives and combination of alternatives, including a combination of more sustainable alternatives and not just those considered at Gate 2 in c.2021 (RR-354, Section 14b).

Note 1: First an updated carbon assessment for the scheme is needed to take account of the submitted schemes higher deployable output (inc. maximum), consistent operating periods, all new and additional treatment processes (including off site), current pipeline and pumping assumptions, a reasonable worst case scenario drought operation, and sensitivity testing, as the scheme is now much larger than the output assessed at Gate 2 when the applicant considered alternatives. ES Chapter 10, Table10-7 indicated the WRP capacity was just 15Ml/d, it is now 60ML/d (RR-354, Section 14b).

C2 Cumulative and in-combination effects

WMC request the following sub-headings are added to the matters to be considered under this Principal Issue.

i. Whether cumulative effects with other proposed effluent recycling plants have been adequately assessed, including in relation to emerging contaminants of concern. (RR-354 Section 20a)
ii. Whether the cumulative impact on hedgerows of the 35km and other scheme pipelines has been assessed, and whether this could be mitigated through the use of trenchless techniques at hedgerow intersections.

C3 Good design

No additional sub-topics proposed

C4 Health, recreation and well being

WMC request the following sub-headings are added to the matters to be considered under this Principal Issue.

i. Whether there will be the necessary expert independent audit, scrutiny, control and reporting to give the public the necessary confidence in using the water derived from the HWTWRP, as found in other countries using effluent recycling (RR-354, page 89)

ii. Review how emerging contaminants of concern are being considered and addressed in communities served by effluent recycling plants in other countries, and what research/ health studies have been carried out to assess the impact of increased background exposure where water recycling is used to supply tap water (RR-354, Section 9e)

iii. Consider the potential health impacts of consumers choosing to reject tap water as a result of the introduction of effluent recycling. For example, such as reduced

consumption of tap water and substituting tap water with less healthy sugary drinks (RR-354, Section 10b).

iv. Given the significant impact on the Bedhampton and Havant community, consider the adequacy of the improvement funds offered to HBC to provide meaningful benefits in terms of tackling coastal erosion risk at Broadmarsh, footpath and habitat improvements at Broadmarsh and habitat and footpath improvements along the Hermitage and Riders Lane Stream (RR-354, Section 18)

C5 Habitats Regulation Assessment

WMC request the following sub-headings are added to the matters to be considered under this Principal Issue.

i. Whether sufficient information has been provided to assess the impact on The Solent protected area, including in combination impacts with other proposed effluent recycling projects (RR-354, Section 20a).
ii. Whether the selection of Site 72 for the construction of the Water Recycling Plant and associated infrastructure (including the pipeline tunnels) poses an unnecessary risk to the SPA/SAC due the risk of leachate mobilisation, including whether a sufficiently precautionary approach has been taken to the risks, when the risk could have been eliminated by following the mitigation hierarchy and selecting an alternative site (i.e. project level avoidance in line with NPS-WRI Section 3.3.2) (RR-354, Section 20b & page 97ii).
iii. Whether the cumulative effects of loss of Brent goose and wader habitat that may be functionally linked to the SPA has been adequately assessed (RR-354, Section 20c & page 97iii).

C6 Land quality and ground conditions

WMC request the following sub-headings are added to the matters to be considered under this Principal Issue.

i. Assess whether odour concerns can in fact be controlled during construction, and whether the risks can be adequately secured through the Order (RR-354 Section 12, page 91)
ii. Assess whether leachate migration to Langstone Harbour can in fact be controlled during and after construction, and (linking to RR-354 Sections 3 and 19) whether these short- and medium-term increased risks can be adequately mitigated and controls secured through the Order (RR-354 Section 12, page 91 & 95)

Ex A to note:

a) The related sub-heading set out in C5 paragraph 2, Habitat Regulation Assessment, relating to project level avoidance in line with NPS-WRI Section 3.3.2, and whether the

selection of the landfill site poses an unnecessary risk to the SPA/SAC due the risk of leachate mobilisation?

b) The related sub-heading proposed in C11 Water Environment; "Whether the proposed mitigation can address the increased risk of leachate migration to Langstone Harbour (RR-354-Section 12 &17)
The ExA needs to decide and advise where and when these issues will be examined.

C7 Landscape and visual effects

WMC request the following sub-headings are added to the matters to be considered under this Principal Issue.

Whether the Applicant has adequately assessed the landscape and visual impacts of the WRP (including from Portsdown Hill and around Langstone Harbour) and of the above-ground pipework in the Old Bedhampton Conservation Area (RR-354 Section 13 & page 92)

Note: See separate WMC document proposing locations for site visits by the ExA, in winter at hightide, daytime and at night.

C8 Need

Welcome the inclusion of this matter as a Principal Issue and request that consideration of need includes;

i. Whether there is a proven need for this specific project (rather than a given volume of water)
ii. Whether the scale of need is overstated? - based on high population-growth, high abstraction-reform assumptions, and high leakage (RR-354, Section 5a)
iii. Whether there is justification for the size of the plant now, noting that the plant capacity has increased from 15 to 60Ml/d and the plant could be built in modules as required (RR-354, Section 5a).
iv. Whether there is a specific need for effluent recycling at this location? The need driving the project is in the Southampton/Winchester area while the plant is proposed at Bedhampton, some 35km away (RR-354, Section 5b).

C9 Terrestrial and freshwater biodiversity

Bullet 1 focus relates to mitigation, control and compensation proposed and secured.

WMC request addition of;

i. Whether there has been adequate assessment of the impacts on ecology including the risks of bioaccumulation.
ii. Whether there should be mitigation or compensation in the streams south of the reservoir that will receive recycled effluent as requested by Havant Borough Council and confirmed in the draft SoCG row HBC-2024-0027 (RR-354-Section 18a)

iii. Whether there is any risk or reduction in value to the benefits to be delivered under the original spring fed reservoir permission as a result of the HWTWRP? For example, potential impacts on the reservoir wetland, which have not yet been assessed.

C10 Traffic and transport

No additional sub-topics proposed

C11 Water Environment

Welcome the inclusion of this matter as a Principal Issue and request clarification/ inclusion on the following.

Ex A bullet 3 refers to 'ensuring regulatory compliance'. Regulatory compliance alone will not address the specific effects and risks of this scheme to the environment or people, due to the gaps in the regulatory framework, and the lack of effluent recycling regulations found in other countries.

As stated in our section 3a (2) above, if this is not to be considered a PI, as a minimum the community would request that the Water Environment PI is expanded to remove the words "ensuring regulatory compliance" and to replace them with; "whether the existing regulatory regimes, together with the controls in the dDCO, are capable of controlling the specific risks of the scheme, including contaminants with no Environmental Quality Standard (EQS), and whether further controls, including independent audit, are needed and can be secured." Compliance with a permit that does not cover substances of concern says nothing about that substance's risk.

The community also ask that the ExA consider;

- How to achieve the same level of independent control and scrutiny found in other countries using effluent recycling and whether conditions can be applied to secure this? (RR-354-Section 19 a to e). *This issue overlaps a number of topic headings, either include under Water Environment, Health or have an Issues Specific Hearing. Ex A to determine where it sits best in the examination programme.*
- Where water quality impacts on coastal waters, including The Solent are considered? Whether the applicant has adequately assessed impacts on marine water quality, accumulation in sediments and bioaccumulation? (RR-354-Section 9 c & d). *The ExA may have intended that this be included under 'operational impacts' in their bullet 4, expansion of the text would clarify this*.

We note that Water Environment PI, bullet 3, refers to "whether sufficient arrangements are proposed for monitoring", but first we ask the ExA to;

a) Consider whether the monitoring completed to date (including the pilot plant data) provides adequate information upon which the ExA can assess the risks. Including in relation to Transformation Products formed during treatment.

b) Recognise that monitoring is not mitigation, it cannot provide adequate protection as;
   - There will be a delay of about 28 days in obtaining analysis data for many of the contaminants of concern, the polluted water will already be in the reservoir, or downstream before the results are received.
   - It will take many years for standards to be developed and put in place so that regulators can amend permit conditions and enforce limits for the contaminants of concern that have no EQS.

In addition, the community request that the following matters are added as sub-topics for consideration under the Water Environment PI.

i. Whether the assessment of impacts from changes in salinity, geochemistry and temperature are robust and will result in a likely significant impact on the biological assemblage which would have established in the chalk spring fed reservoir, including the retained wetland (RR-354-Section 4b & 9a)
ii. Assess the extent of remineralisation proposed prior to discharge, the impact on reservoir geochemistry and the ecology likely to develop, and consider applying controls on the quality of remineralisation, including whether a condition can be applied to require that the geochemistry of the discharge matches that of the chalk spring water approved for filling under the original reservoir consent to protect the unique biodiversity opportunity that was presented by the development of the first chalk spring fed reservoir anywhere in the world (RR-354-Section 4b & 9a).
iii. Whether the application provides sufficient information to be able to robustly assess the impact of recycled effluent on the retained wetland compartments (provided as mitigation/ compensation for the loss of habitats in relation to the spring fed reservoir permission), noting that each compartment has a different topography, which may support different species and that needs to be factored into the assessment (RR-354-Section 9a, page 45)
iv. Consider how the maintenance of seasonally fluctuating reservoir water levels, important to optimising the biodiversity of the original spring fed reservoir, would be secured and by whom they would be verified (RR-354-Section 4c, 10d & 19). Noting the concern that if the applicant (or their contractor) were to take operational control and keep the reservoir completely full using recycled effluent the seasonal benefit of having exposed mud around the margins of the reservoir and wetland would be lost.
v. Whether the impacts on water quality and ecology in a drought when water levels will be drawn down in the reservoir have been adequately assessed, at a time when there will be no spring water input, increased recycled effluent input (up to 60 Ml/d) and there is less water in the reservoir for dilution. Including any impact on the retained wetland if it is topped up with recycled effluent during refilling (reasonable worst-case scenario).
vi. Whether the proposed mitigation can address the increased risk of leachate migration to Langstone Harbour (RR-354-Section 12 &17).

Item 4 (PM) – Draft Examination Timetable (Annex D)

4.1 Request for Issue Specific Hearings

The WMC ask that the ExA give consideration to including in the examination programme the following Issue Specific Hearings.

A. Risk/ impacts related to the location of the Water Recycling Plant on the Broadmarsh Landfill including;

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- Landfill risks; increased leachate and landfill gas generation and mobilisation.
- Odour impacts which the community are concerned cannot be mitigated.
- Failure to follow the mitigation hierarchy and to take a precautionary approach to avoid the increased risk to the Langstone Harbour SPA/SAC, despite lower risk sites being available (project level avoidance was possible)
- Lack of robust alternative site assessment for the selection of Site 72.
- Concern that the increased leachate risk to Langstone Harbour (SPA, SAC, Ramsar) cannot be prevented by the proposed mitigation.

B. Reservoir provisions in the DCO including;
    - Whether Articles 3(1)(b), 5, 9 and 46 and Schedule 8 (and related) of the draft Order and whether the powers sought fall within the scope of the 2008 Act.
    - Whether powers of that breadth over an asset owned and operated by a different statutory undertaker are necessary and justified?
    - Whether the ability to transfer the benefit of all or part of the order to a third party (Article 9 -1a and 2) is reasonable or necessary. The proposal would allow the Applicant or a third-party contractor to take over control of the reservoir
    - Whether the impact of the material change has been adequately assessed?
    - Whether the restrictions in the draft Order are genuinely necessary, or whether adequate controls could be achieved through a more appropriate and flexible vehicle (for example a bulk-supply / commercial agreement).
    - Whether any restriction should be limited to the operational life of the Plant.

C. The WMC have requested in Section 3a(2) of this submission that the adequacy of the regulatory framework available to control the specific effects of this scheme on people and the environment be examined as a Principal Issue, and that an Issue Specific Hearing be held on it. Including consideration of the securing mechanisms for the controls necessary to address the risks.
    - If this topic is not to be considered as a PI we repeat our request that it is allocated time in the programme for an Issue Specific Hearing.

D. A second Water Environment Hearing be held once further information has been provided by the Applicant (including responses to the ExA first written questions), to enable the public to raise matters of concern in relation to the fourth Water Environment

Bullet in Annex C, and other sub-categories proposed by the WMC listed in Section C11 above.

4.2 Deadline for comments on the draft DCO

We note that the Rule 6 letter, F2, says that "*Any interested party seeking that an article or requirement [of the dDCO] is reworded should provide the form of words which are being sought*." There is an implication in Annex F – relevant to the proposed Examination timetable – that such interested parties (e.g. Water Matters Community) must provide fully drafted alternative wording for the draft DCO by either deadline 1 (23rd November) or deadline 2 (16th December).

If these deadlines are intended then our submission is that either of these dates is too early; detailed alternative drafting cannot be suggested by interested parties until further written submissions have been submitted and understood (e.g. such as those identified in Rule 6, Annex F, in particular the Statement of Common Ground between Southern Water and Portsmouth Water) and until the relevant underlying principal issues (underpinning such drafting) have been examined.

The ExA is asked to reconsider the deadline for alternative wording of the draft DCO.

Item 5 (PM) – Procedural Decisions (Annex F)

The ExA has asked the Applicant for a single table giving each NPSWRI paragraph, a summary of the policy requirement, and where it is addressed in evidence. The first version is due at Deadline 1, with updates through the examination. The WMC welcome the request for an NPS Accordance Table (Annex F, decision 6), and ask that;

- It is built to show where compliance is contested, not only where the Applicant says a policy is addressed.
- It expressly covers NPS-WRI 1.4.7, 3.5 and 3.8.3.

Note 1: The Preliminary Matters Hearing agenda labels item 5 "annex E", but the procedural decisions are in Annex F.

Item 6 (PM) – Any other matters

PINS have advised that the preliminary matters/ concerns raised on page 8 & 9 of the Water Matters Community RR can be raised under item 6.

6.1 Preliminary Matters raised in the Water Matters Community Relevant Representation

Has the ExA considered the preliminary matters raised by Water Matters [RR-354, pp8–9], Andrew Newbery [RR-018] and Ron Tate [RR-273]?

What view has it formed, and does it intend to act?

The preliminary matters were set out on page 8 & 9 of the Water Matters Community representation (RR-354) and are summarised below.

a) The description of the development does not give due weight to the material change which the Order would authorise to Havant Thicket Reservoir.
b) The wording of the Section 56 notice was capable of misleading.
c) Notices were not displayed where they would come to the attention of those most affected.
d) The categorisation of the Project under Dams and Reservoir, when it is actually a Water Treatment and Water Transfer project.

We raised these matters at the outset because they bear on whether some of the people most likely to be affected by the scheme have had a fair opportunity to understand what is proposed by Southern Water and input to the process.

6.2 Failure by the Applicant to follow the statutory process

Southern Water selected the HWTWRP in 2021 without consulting the community likely to be impacted by the scheme, nor consulting on the alternatives at the formative stage, and without following the statutory consultation process for water resources planning under the Water Industry Act 1991. Rowlands Castle Parish Council, in whose area half the reservoir lies, was not consulted [WA010002-000688, Inadequacy of Consultation Report].

Note: Concerns about this matter are included at Item 3a. WMC representatives will only need to raise under AOB if no opportunity to raise and discuss has been provided earlier in the meeting.

6.3 Missing information and documentation to be provided by the Applicant.

The WMC Relevant Representation identified information and documentation that was missing or needed to be provided by the Applicant in order to enable an informed assessment by the ExA on a large number of relevant matters. This information and documentation is still missing.

We formally request that the ExA requires the Applicant to provide the information and documentation identified in **APPENDIX A**. To help the ExA we have consolidated the information and documentation gaps under key subject headings in APPENDIX A.

Section 2 - Open Floor Hearing 1 (11/11/26 -PM)

We recognise that for the sake of an efficient process the Rule 6 letter (Annex B, B6) encourages "***speakers with common points … to come together to nominate a spokesperson or representative speakers to cover specific topics, so as to avoid repetition***". With this in mind, the Water Matters Community support the oral representation to be given by the following speakers on the topics listed. Having "come together" in the manner encouraged we would ask the ExA to provide these speakers with "***an additional time allowance, recognising their representative role***"

OFH1- A- Topic: Impacts of water quality concerns & what SW have not considered

Includes the communities concern about the indirect impact of people rejecting tap water due to lack of public trust in Southern Water and turning to bottled water or home treatment devices, which has potential health, environmental and economic costs. Indirect impacts that have not been assessed by the Applicant.

Speaker: Bianca Carr – Final Straw Foundation (Technical Advisor to SOSCA)

OFH1- B- Topic: Inadequate consultation & objections to effluent recycling

Concerns about the lack of public consultation on the scheme and potential alternatives before the HWTWRP was selected in 2021, including no consultation with Rowlands Castle Parish Council in whose area the reservoir is located, along with reasons for the Parish Council and wider communities' opposition to the effluent recycling proposal.

Speaker: Chris Stanley - Chairman of Rowlands Castle Parish Council

OFH1- C- Topic- Public concerns about the HWTWR project, the lack of robust information to understand the risks, and the need to secure robust independent scrutiny.

Speaker: The Rt Hon Suella Braverman KC MP

Section 3 – ISH1, Water Environment (12/11/26)

We recognise that for the sake of an efficient process the Rule 6 letter (Annex B, B6) encourages "***speakers with common points … to come together to nominate a spokesperson or representative speakers to cover specific topics, so as to avoid repetition***". With this in mind, the Water Matters Community support the oral representation to be given by the following speakers on the topics listed. Having "come together" in the manner encouraged we would ask the ExA to provide these speakers with "***an additional time allowance, recognising their representative role***".

Agenda Item 3 (ISH1) – Scope and content of the applicant's assessment of the water environment

Topic A – Inadequate information on which to base the assessment

Speaker: Tracey Viney – Retired environmental regulator, Drinking Water Inspector and Havant Thicket Reservoir Project Manager (Technical Advisor to Water Matters)

Topic B – Impacts on water quality and potential harm

Speaker: Beth Hawdon - Ecotoxicologist

Topic C - Concerns about the current water environment assessment and transparency

Professor Alex Ford - Environmental toxicology and water industry misinformation /disinformation (Technical Advisor to Water Matters)

Agenda Item 4 (ISH1) – Regulatory roles, responsibilities and compliance

Topic D – Concerns about gaps in the current regulatory framework and lack of independent control

Speaker: Tracey Viney – Retired environmental regulator, Drinking Water Inspector and Havant Thicket Reservoir Project Manager (Technical Advisor to Water Matters)

Agenda Item 5 – Responsibilities for interfaces with Portsmouth Water

Topic E – Interfaces between Southern Water and Portsmouth Water, including concerns about the draft DCO and its implications

Andrew Newbery – Retired Water Industry (Technical Advisor to SOSCA)

HWTWRP - WA010002 – Examination Process

Water Matters Community Submission for 2/11/12 deadline

PINS registration identification number is: [redacted]

APPENDIX A

Missing information and documentation to be provided by the Applicant.

The Water Matters Community (WMC) Relevant Representation (ref: RR-354) highlighted where information was not provided with the DCO application, or was not located, that the WMC believe is important to both the ExA and the public understanding of the risks and impacts of the proposed HWTWRP, including what mitigation, compensation or other controls are needed.

As identified above in respect of Preliminary Meeting, agenda Item 6.3, we formally request that the ExA requires the Applicant to provide the information and documentation identified below.

Water quality, contaminants and treatment

1. A robust risk assessment of hazards in the sewer catchment to Budds Farm WWTW has not been provided (RR-354 p41). This is critical to assessing the adequacy of the water quality parameters considered and modelled, including likely Transformation Products. A robust risk assessment report should be provided to give confidence in and underpin the environmental impact assessment, especially the monitoring requirements needed to assess the risks.
2. There is a lack of information on the screening process(es) used before selecting the parameters for quantitative assessment and modelling. For example; there appears to be no reference to a screening methodology in ES Appendix 19.11 Havant Thicket Reservoir water quality modelling (RR-354 *p51 (reservoir), p51–52 (coastal), p53 and Table 2 p90 refer)*.

    a) A report should be provided which clearly sets out how contaminants were screened out from the requirement for modelling for the reservoir, downstream and coastal environment, with a full explanation of the assessment method used, data source, any redaction or manipulation of the data clearly stated, with the screening data and outputs provided in supporting spreadsheet form with clear tab titles for different scenario modelling if that is the format used.
    b) If Budds Farm and Peel Common pilot plant data is being merged for use in the screening assessment then this should be justified by the Applicant, as Peel Common WWTW would appear to have a less industrial catchment than Budds Farm WWTW.

3. Ofwat's 2026 review of reservoir costs confirmed that additional treatment is needed at Farlington WTW. No details of what is required or its impacts was found in the application documents. RR-354 Section 14 Carbon and Section 15 Energy both refer. The applicant should provide detail as to what additional treatment is required at the Farlington WTW and how its impacts have been assessed. This should be clearly set out in the relevant sections of the EIA.

4. Information on the extent of remineralisation proposed has not been provided (RR-354 p24(a), p44, p66). Southern Water has previously indicated that they will not re-mineralise the recycled effluent to match the geochemistry of the existing spring water that will fill the reservoir.

    a) The potential impact on the ecological value of the first chalk spring water reservoir anywhere in the world must be assessed.
    b) Information on the planned extent of remineralisation of recycled effluent proposed by the Applicant must be provided so that the impacts on chemical use (including transport, storage & carbon), water quality (geochemical changes) and ecology can be properly assessed.

5. Require the Applicant to publish the full monitoring record from the effluent recycling pilot plant trials at Budds Farm and Peel Common WWTW, including every determinant measured, showing the detection limit (not zero or blank), and provide details of every known process failure or shutdown with results for that period, so that the Examination can test and establish the facts. The risk assessment that determined the contaminants to be tested for in the pilot trial should also be made available (RR-354 p33, Table 2, p86).

    a) Ask the applicant to explain why so few samples were analysed for contaminants of concern in the pilot plant trials? Often only between 2 and 5 samples were analysed even though the plant was in place at Budds Farm WWTW for about 8 months (RR-354 p51)
    Note: An EIR request has confirmed that the EA have provided 'Pre-application guidance for RAPID water recycling schemes – investigating and evidencing what is likely to be in the new proposed discharges.' This makes it clear that "adequate monitoring data be collected to inform the concentrations expected to be in the proposed discharge". Or adequate evidence is provided to demonstrate that certain substances are not likely to be present. Provision of such a small number of analysis results for pollutants getting through the treatment process cannot be considered adequate to assess the risks the discharges poses. It certainly does not enable consideration of any seasonal changes in the contaminant load.

    b) Confirm that the detection limits used for the Applicants pilot plant analysis were in line with or better than the detection limits set out in the EA pre-application guidance Appendix 1 table?
    c) Based on a robust risk assessment ask the applicant to identify other contaminants of concern (e.g. TFA, Gen X, PBDE's, breakdown products of

oestrogen, radiation, virus and prions) that were not tested for during the pilot plant trials, but where they are known to be present, or are likely to be present in the final effluent from Budds Farm WWTW. Include a commentary on whether those contaminants could pass through different stages of the treatment process, what their breakdown products are, what risk they or their breakdown products might pose to the environment or drinking water, including whether they are persistent and could accumulate in the reservoir or downstream, including any risk of bioaccumulation (RR-354 p41).

Note: Without a robust risk assessment the contaminants of concern that need to be considered and tested for cannot be defined. The EA pre-application guidance document provided to the Applicant in 2026 set out the ***need for a risk based approach to identifying pollutants likely to be present****, including evaluating if detail held on water company's trade effluent consents are representative, and* ***identified 113 parameters as key sources of potential pollution from wastewater discharges with potential environmental risk to surface waters****. The Applicant has provided no robust risk assessment, no review of the trade effluent consent database or the adequacy of the current trade monitoring requirements. For the 113 parameters the EA listed 66 were not analysed for in the final post effluent recycling pilot plant samples, and 25 were detected in feed but never measured in treated water* (*The numbers recorded here are based on an AI review of the table in the EA guidance and the analysis data provided in EIR requests from the Applicant and the EA, both of which will be submitted for inclusion in the Examination Library*)

d) Ask the applicant to provide the CIP4 sampling results gathered for relevant monitoring points, including since October 2025 (APP-098, 19.8.108).

e) Ask the applicant to provide the 2024 water quality modelling report which Portsmouth Water identified as missing.

6. Provide an explanation as to why the maximum and average concentrations of some contaminants increased in post pilot plant samples. For example; iopromide, propylparaben, bisphenol A and TCPP (RR-354 p43 para 1).

In addition, the applicant should set out clearly a full list of the treatment chemicals, other substances used in plant/ pipe/ filter cleaning processes (e.g. anti-fouling chemicals) as well as what potential Transformation Products have been identified that could be formed.

Information should be supplied to confirm whether the chemicals and compounds identified have been risk assessed and/or monitored as part of the pilot plant trial? As well as what the outcomes were of risk assessment and monitoring?

Note: The EA pre-application guidance document provided to the Applicant in 2026 highlighted the need to consider 'substances added for the purposes of treatment or introduced to the effluent stream at the WWTW's and WRP. However, other contaminants can also be created during the treatment process such as Transformation Products which can be more persistent and toxic than the initial pollutant from which they are derived. The EA pre-application guidance refers to the need for "**Any substance that is likely to be present in a proposed discharge will require adequate monitoring data to assess the risk".** The applicant must

therefore provide adequate monitoring data and risk assessment for treatment chemicals, other substances used in cleaning processes (e.g. anti-fouling chemicals) as well as potential Transformation Products.

7. Provide information to substantiate what contaminants will and will not be fully removed by GAC, and explain how the Applicant derived post Granular Activated Carbon (GAC) data, when the pilot plant did not include a GAC treatment process?

   For each contaminant that passed through the pilot plant, or was created during treatment, above the level of detection, provide the GAC removal rate assumed, its source to substantiate the assumption, and the resulting concentration (or range) expected in the discharge to the reservoir.

   This is important as published research shows the extent to which GAC can remove contaminants varies between determinants e.g. 72-100% for pesticides and 62-92% for pharmaceuticals, with poor removal of 1,4-dioxane (RR-354 p41-42 & 52). This confirms that not all of the contaminants which could pass through the treatment process are likely to be fully removed by GAC. The ExA need clear information on what gets through to the reservoir so that they can ensure the risks are adequately assessed.

   Noting that the Applicant has acknowledged that 40% of contaminants of emerging concern were still detectable after treatment (ES Chapter 19 Water Environment APP-098 & RR-354 p40),

8. Havant Thicket Reservoir is a confined water body. Once persistent substances such as PFAS reach it, they cannot be removed. The reservoir modelling does not assess accumulation of contaminants over time in water, sediments or biota, nor does it robustly assess the impact of pollution incidents when things go wrong (RR-354 p43-44). The applicant should provide reservoir modelling for a broader range of contaminants of concern, especially those shown to get through (or likely to get through) the pilot treatment process. The modelling should assess the potential build up of persistent contaminants of emerging concern over different periods of time within the plant's operational life (e.g. 1, 5, 10, 25 and 50 year intervals) in the reservoir water body, sediments and biota, including the impact of reasonable worst-case scenarios, such as a multiple year drought and the plant not operating at its optimum performance. (RR-354 p43, p51, Table 2 p89 and p90 [ii]).

9. The risk to the retained wetland conservation area along the northern shore of the reservoir from effluent recycling does not appear to have been assessed. Risks from changes in water quality due to effluent recycling and the impact that could have on ecology must be considered and assessed under any operating condition when mixed water containing recycled effluent can flow from the reservoir into the retained wetland. This includes after drawdown of the reservoir, as when the reservoir is refilled when the recycled water it will enter the retained wetland at a time when there will be minimal or no dilution (RR-354 p45–46), as the ephemeral streams which discharge

into the northern wetland in winter will be dry. Noting that the topography of each wetland compartment is different and must be assessed individually.

10. There is a lack of detail on sodium inputs to the reservoir and changes in salinity: how salinity builds up and changes over time, including in a drought when more recycled effluent goes in to the reservoir (RR-354 p52-53). The Applicant should confirm;

    a) How and where salinity has been modelled and assessed under different operating regimes, including during a drought when water levels are low and 60Ml/d of recycled effluent is to be discharged into the reservoir every day?
    b) How the impact on changes in salinity have been assessed for the ecology in the reservoir, retained wetland compartments and downstream (RR p52–53).

11 Has information been provided on any potential reduction in the nitrate benefit to Langstone Harbour under the proposed new HWTWRP operating regime? The applicant should identify where this has been assessed to show the nitrate benefit to Langstone Harbour proven by modelling for the spring fed reservoir is maintained (RR-354 p46 & 95).

Note: A confirmed benefit of the spring fed reservoir was to provide a reduced direct input of spring water containing elevated nitrate in to Langstone Harbour. Stakeholders have previously expressed concern that If the reservoir is already kept topped up through the summer with recycled effluent (or refilling has commenced before September with recycled effluent) then less spring water will be needed to fill the reservoir in autumn, and the benefit to the SPA/SAC may be lost.

Health and public confidence

12. Ask the Applicant to provide an independent report from a qualified public health specialist on;

    a) How emerging contaminants of concern are considered and addressed in communities currently served by effluent recycling plants? and
    b) What research and health studies have been undertaken to assess the impacts on communities of drinking recycled water, including assessing any increased exposure to emerging contaminants of concern such as PFAS. The research should include looking at areas supplied by water recycling plants that take their effluent from highly urban and industrial catchments, not just rural sewer catchments (RR-354 p48-49).

13. Consider the indirect effects of a proportion of the population rejecting tap water, and the resultant impacts including;

    a) On health if people drink less water, or consumers turn to alternative drinks with a higher sugar content.
    b) The increased use of bottled water and home filtration devices, including environmental and economic effects to consumers and councils (RR p54).

Note: Economic impacts assessed should include the extra cost to vulnerable consumers of buying bottled water when household budgets are already stretched, as well as the additional waste collection and disposal costs to local authorities.

Landscape and visual

14. The following important viewpoints are missing or have not been fully considered during the landscape and visual impact assessment (RR-354 Section 13, p 61- 63). The impact needs to be considered by the Applicant during the day and at night.

    - Portsdown Hill impact on views towards the WRP (RR-354 p61).
    - Hayling Island Old Billy coastal path and West Hayling Nature Reserve (RR-354 p61).
    - Viewpoint 017: the 15-year (winter) projection is missing, even though the Applicant assessed this location as having the most significant impact (RR-354 p62).
    - The high points on mounds to the east and west of the Broadmarsh Coastal Park western car park that directly overlook the WRP site, where you can see the existing ground and trees at the back (north side) of the WRP site.

In addition, a more robust assessment is necessary in the Mill Lane area where it is proposed that large above-ground pipes are to be located within the Old Bedhampton Conservation Area. The construction of the pipes above ground will have a significant impact, including where the pipes crossed the Mill Pond (RR-354 p63/65). The visual impact needs to be considered from various vantage points along the public footpath which runs from Mill Lane to Bedhampton springs south of the railway line, and from the north end of the Mill Lane historic railway bridge (RR-354 Section 13b p63)

Note: The Water Matters Community will submit a separate request for the ExA to visit these key locations, with specific suggestions for locations to visit.

Construction, operation and decommissioning

15. The applicant has not considered decommissioning and the associated long-term risks or impacts. This is a particular concern for all elements of the development at the Broadmarsh landfill (Site 72 for the WRP), including the tunnels and pipelines which pose a significant long-term risk for landfill gas and leachate migration (RR-354 p55). The applicant should be asked to assess the risks associated with decommissioning and submit a report on potential risks of leaving below ground tunnels, pipe and plant insitue as proposed (RR-354 Section 10c p55).
16. It is not currently clear what sludge is generated, nor how it will be disposed off and any potential impacts. The Applicant should confirm the destination and disposal route of every residual waste stream from the treatment process, including filtration and membrane residual waste sludge and chemical cleaning waste, and whether any

of them are returned to Budds Farm WWTW. Information should be provided on the environmental and treatment impact of the disposal route(s). (RR-354 p55–56).

17. An independent peer review is needed of the Applicant's assertions on pipeline washouts: whether sediment will accumulate at any low-flow point in the transfer pipelines, and whether collecting and removing washout water by tanker, for initial post construction cleaning and any later bursts, as proposed is practical and likely to happen in the real world (RR-354 p56).

19. The Applicant to identify each element of the design/Order for which flexibility is sought, the maximum parameters which have been assessed in the Environmental Statement, and the mechanism by which those maximum parameters are secured (RR-354 p58, Table 2 p91).

20. Provide the missing SoCG between Southern Water and Portsmouth Water (RR-354 p39).

Carbon

20. Clarify what assumptions in the carbon assessment have been made and how they are substantiated? For example, what standard of remineralisation is assumed before discharge into the reservoir? The quantities of chemicals used in the assessment should be provided, with confirmation that they represent a reasonable worst case with the plant operating at full capacity (RR-354 p66-67).

21. Clarify whether the carbon assessment provided with the application included emissions from transferring water from Budds Farm WWTW to the WRP, and from Bedhampton Springs to and from the reservoir? If not, the assessment should be updated (RR-354 p66).

    a) Require an updated carbon comparison of alternatives on the submitted scheme and a reasonable worst-case (drought) operational assessment (RR-354 p93i).
    b) Clarify how changes in operation and flow at Bedhampton Springs, Otterbourne WTW and other off-site impacts have been considered (RR-354 p67).
    c) Clarify what additional off-site impacts result from the extra treatment needed at Farlington WTW, e.g. increased energy use, chemical use and backwashes (RR-354 p67).

    Note: since the WMC RR was submitted, Ofwat's cost review has confirmed that additional changes are needed at Bedhampton Springs and Farlington WTW to accommodate the HWTWRP. These changes must be included on the revised carbon and energy assessment.

22. The applicant should justify excluding fugitive emissions from the Broadmarsh landfill during construction, given that large areas of the landfill will be opened up, exposing

buried waste to oxygen and rainwater, which is likely to reactivate decomposition producing additional methane and carbon dioxide (RR p67).

Energy

23. The Applicant's figures (Appendix 10.1, Table 1-3) give only two transfer rows under mean flows, with no combined total, no peak (drought) figure, and no data for the uphill Bedhampton-to-reservoir transfer, or the Budds Farm–WRP transfers. Nor is it clear if the energy demand of the treatment process itself (WRP) has been included

    The applicant should clarify whether Appendix 10.1, Tables 1-3 provide information on the power consumption for the WRP, and explicitly the derived average and peak energy consumption attributable to:

- operation of the WRP treatment processes (including all ancillary use such as site lighting);
- pumping final effluent between Budds Farm WWTW to the WRP;
- pumping between the WRP and Bedhampton Springs;
- pumping between Bedhampton Springs/the WRP and Otterbourne WSW, including consumption by pumping stations and other above-ground plant along the route; and
- any other material operational electricity loads included within Table 1-3 or missed.

    More detail on these queries is provided in RR-354, p69-70, p94) If any element of the scheme was not included in the initial energy assessment the assessment should be updated.

    The Applicant should provide;

    - The missing information for the uphill transfer of recycled water from Bedhampton to the reservoir, and from Budds Farm WwTW to the WRP (i.e. operating the new pumping station) (RR-354 p69).
    - Provide an updated energy assessment, including comparison of the revised assessment with alternative options to effluent recycling.

24. The Applicant to clarify the grid capacity around the WRP and High Lift Pumping Station: whether the project's needs can be met, and what impact or restriction it will have on future growth in the Bedhampton and Havant area (RR-354 p71), or say where this is covered in the application documents.

Community benefits

25. The Applicant to list the benefits to be provided by the scheme, distinguishing between those already secured under the original reservoir consent, from new genuinely additional benefits attributable to this project (RR-354 p75,& Table 2, p96).

Alternatives

26. Identify where any alternative buffer options were assessed, against what criteria, by whom and when, and where the reasons for rejection are recorded (RR-354 Table 2, p83).

27. The Applicant to provide a copy of the original draft WRMP24 Annex 12 which was restricted during the 2022/23 consultation period. This is needed for transparency to validate and cross-check the information now provided in the May 2026 version is consistent. The earlier document formed the basis for assessment and selection of the HWTWRP. Ideally document tracking information would also be provided for examination (RR-354 p12 viii) to clearly show where the document changed between 2022 and 2026.

Note for ExA:

WMC would like to provide additional written evidence on the Alternatives, which the ExA has confirmed will be considered as a Principal Issue, to aid understanding of the concerns. This would include providing additional evidence from a retired water industry expert on leakage and a more robust assessment of the alternative sites for the Water Recycling Plant (RR-354 p20 referred).

Please can the ExA advise when they would like to receive the additional information related to the Alternatives - Principal Issue.