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Deadline 1 submission – HWTWRP ref. WA010002
Preliminary Matters Hearing 11 November 2026
Presentation to Examining Authority & supplementary information
Pat Brooks on behalf of Havant Friends of the Earth & Havant Climate Alliance. Interested Party Reference: [redacted].
Supported by: Water Matters Community, Rowlands Castle Parish Council, Save our South Coast Alliance, and Andrew Newbery

CARBON and ENERGY OVERVIEW

We object to the HWTWRP and are concerned that Carbon emissions and Energy consumption have not been identified as a Principal Issues.

We ask that the ExA reconsider this and include Carbon emissions and Energy consumption as Principal Issues, our reasons are set out below:

Both the NPS-WRI – Section 3.5 and the EIA Regulations identify the need to assess alternatives. The extent to which energy impacts have been assessed as part of the alternative assessment is not transparent. The comparison should consider reasonable alternatives and reasonable combinations of alternatives, including a combination of more sustainable alternatives and not just the options considered at Gate 2.

We ask that if Carbon and Energy are not to be considered as Principal Issue, then as a minimum, the adequate consideration of lower emission alternatives should be included as a sub-heading to the Principal Issue of Alternatives.

The National Policy Statement for water resources infrastructure requires evidence of appropriate mitigation and demonstration that feasible options have been investigated for energy-efficient technology or processes, energy recovery, renewable energy and offsetting. (NPS-WRI 4.4.13).

These matters must be considered under Schedule 4 and Reg 5 of the Infrastructure Planning (EIA) Regulations 2017, and NPS-WRI 4.4.13 (mitigation options) and 4.4.11–4.4.12 (embodied carbon and assessment against climate obligations)

The effluent recycling plant and large volume water transfers will have a high energy demand and generate significant emissions, but the proposed mitigation is very small. In order that an effective assessment can be made of the mitigation requirements;

We ask the ExA to require the Applicant to present a clear estimate of overall Carbon emissions and then a clear plan for how all these Carbon emissions can be mitigated.

There is a lack of information to support the Applicant's Carbon and Energy assessment, as set out in RR-354 (Section 14 and 15) and RR-129 (Friends of the Earth – Havant).

We support the request made by the Water Matters Community for missing information to be provided by the Applicant on the Carbon and Energy assessments (20 to 24), as well as other matters set out in PDA-027 (Appendix A).

WHY CARBON EMISSIONS AND ENERGY REQUIREMENTS SHOULD BE PRINCIPAL ISSUES.

With reference to documents:

App – 147. ES Appendix 10.1 Carbon Assessment Methodology.
App – 103. ES Appendix 3.1 Primary Mitigation.

1. The National Emergency Briefing in November 25 made clear that Climate Changes forecast by computer modelling are happening faster than predicted.

Scientists emphasised the need to reduce Carbon and Greenhouse Gas emissions as fast as possible.

2. While the Project may be within the UK Carbon Budget, it will still produce extremely high emissions based on the Applicant’s own calculations. This does not include decommissioning.

3. There is insufficient detail to understand how the Applicant’s figures for Carbon emissions and Energy use have been arrived at. (Over 1,000,000 tCO2e combined construction and operational emissions over 100 years, or 856 tCO2e operational emissions per year).

- We ask that the ExA seek more detail so they know that the figures are sound, before they can properly assess the case for Consent.

3a) Many variables are involved but there is a lack of clarity

• How were Treatment Chemicals calculated to be 82% of Operational emissions?
• The extent of re-mineralisation, a key contributor, is not provided.
• Have emissions from opening the Broadmarsh Landfill been included?
• Should decommissioning have been included?

3b) A lot of energy is required for reverse osmosis itself, and also for pumping and pipeline transfers. Only partial figures for this appear to be presented based on estimated flows along 2 lengths of pipeline.

• Has the energy use of water transfer along other pipelines been assessed?
• More detail is needed to show that the overall Energy requirements of the Project have been taken into account.

- We ask that the Ex A undertake a robust examination of the Energy use and Carbon information provided by the Applicant, identify any gaps, request the missing information, and that the relevant reports be updated to consider the impact.

4. National Policy states that the magnitude of carbon emissions alone is not reason for refusal, although the adequacy of mitigation measures will be a material factor in decision making. Can sufficient mitigation be provided?

Only a small amount of mitigation is described. The Applicant refers to Carbon saving through construction by:

4a) sharing a pipeline with Portsmouth Water between Bedhampton Springs and the Reservoir,

4b) the use of SUDS at the Water Recycling Plant and Above Ground Sites,

4c) using more resilient materials.

For the effectiveness of mitigation to be properly considered by the ExA, the Applicant needs to present a clear estimate of overall Carbon emissions and then a clear plan for how all these Carbon emissions can be mitigated.

5. Will the local Electricity Grid be able to provide the amount of energy needed for this Project?

Calculating from the Applicant’s figures this would add 11% to 18% to Havant’s total load.

Will the Local Grid be able to provide this given other increasing demands, such as domestic heat pumps, EV charging and data centres?

Will it have a detrimental effect on other growth in the area?
We ask the ExA to examine the Project's operational energy demand, the grid capacity required to serve it, and whether committing that capacity to this Project would constrain the connection of housing, employment and other new development in the area at a time when grid capacity is already under pressure.
6. The applicant assumed that Greenhouse gas emissions from Energy use will reduce over time as the Grid decarbonises. However, with increasing demands on the Grid from many sources, including this, the decarbonising of energy production may take longer than initially expected.
7. The Water Industry had committed to being operationally carbon neutral by 2030.
- How does this project contribute to sector/ company commitments to operational carbon emission reductions by 2030?
- It seems to be taking us in the wrong direction without properly considering more sustainable combinations of alternatives first.
These are all material considerations to understanding the carbon and energy impact. We ask the ExA to include Carbon and Energy as Principal Issues.
Please note that we support the other representations made at the hearings on the 11 and 12 November 2026 by representatives of the Water Matters Community, Rowlands Castle Parish Council, SOSCA and Andrew Newbery.
NB. No AI was used in the preparation of this document.