21.11.26

Deadline 1 - Summary of Relevant Representation RR-294

Hampshire Water Transfer and Water Recycling Project (WA010002)
Save Our South Coast Alliance (SOSCA)

The SOSCA unique PINS reference is: [redacted]

Use of artificial intelligence: Claude (Anthropic), an AI assistant, was used to help draft this summary of SOSCA's Relevant Representation (RR-294). It worked from RR-294. All sections were drafted with its help and then reviewed and amended by SOSCA. SOSCA has checked the summary against RR-294, confirms that it is accurate and representative, and takes full responsibility for it.

This submission summarises SOSCA's Relevant Representation of 23 August 2026 (RR-294). SOSCA objects to the Project. SOSCA is an alliance of individuals and community groups on the Chichester coastal plain and adjoining coast. It maintains its letter of 9 June 2026 on consultation (WA010002-000687).

Water Matters: In our RR, SOSCA supported the detailed submissions and the requests made by them in RR-354, including in respect of the points made at parts 6 and 19 of such submission (i.e. independent audit and enforcement regime).

In addition, SOSCA asked the Examining Authority to examine eight key concerns as principal issues.

1. **Need and alternatives**. Whether need for this **specific** project is shown (regardless of whether WRMP24 is published), and whether alternatives (leakage and demand reduction, abstraction at the tidal limit, more winter storage) were assessed before the scheme was chosen, as policy and the Gunning principles require.

2. **Havant Thicket Reservoi**r. It was permitted by Havant Borough Council and East Hampshire District Council as local planning authorities on the basis of it being a chalk spring-water reservoir (APP-024, para 8.5). Southern Water's scheme, which will direct *recycled effluent* into the reservoir, and which – through SW's drafting of the DCO – will drive a *coach and horses* through safeguards and environmental gains secured by HBC / EHDC from Portsmouth Water and more general environmental and regulatory safeguards for reservoir that would otherwise have applied. Article 5(8) is drawn particularly widely without justification by SW as to why this is necessary.

3. **Contaminants and enforceable controls**. Under SW's proposals PFAS and other persistent chemicals may accumulate in the reservoir, its sediment and around the long-sea outfall. Most have no agreed standard (APP-098, para 19.6.8). There was inadequate sampling to assess the risks. Controls should be secured in the Order. SW's draft of DCO, Schedule 8 would actually switch-off some of the few permitting and enforcement

powers of the Environment Agency without any justification from SW as to why that is necessary.

4. **Environment and long-term impacts**. Whether effects on humans, habitats, water bodies, landscape, carbon and energy are fully and properly assessed by SW and whether mitigation will be secured in the DCO. Whether all environmental benefits secured when the reservoir was approved will still be delivered if SW's scheme is approved.

5. **Powers over the reservoir**. Southern Water could direct and take control of Portsmouth Water's reservoir. Articles 5 and 46 and Schedule 8 are likely to go beyond what the Planning Act 2008 permits. We object to this. It's unnecessary and unjustified, and as such is *ultra vires*.

6. **Programme**. The Project is one of six recycling schemes planned by 2035. There is a risk that what is settled here will be claimed to be a template.

7. **Flood risk and ground conditions**. Absent from the Applicant's main issues. Budds Farm is in a flood zone with a design life over 60 years. A robust risk assessment should have been undertaken, but wasn't. Concern of risks to Langstone Harbour from construction of plant on a former landfill site. Whether appropriate mitigation can be secured in Order.

8. **Landscape and lighting**. A plant up to 14.5m high beside Langstone Harbour; whether views, screening on landfill and lighting limits are properly dealt with.

SOSCA asked for the draft Statement of Common Ground with Portsmouth Water to be disclosed at once, and for SW to provide the Principal Areas of Disagreement statements as soon as available (a document which is mentioned in the library, but which we could not find).

SOSCA asked the Examining Authority to require SW to provide clear answers and evidence to the points raised, hold focused hearings, and ensure essential safeguards are legally enforceable and independently verifiable before any consent. Whilst we provided comments on the details of SW's proposed scheme, we repeat that we object to the proposal happening at all.

SOSCA uses "recycled effluent" for what the Applicant calls "recycled water" (RR-294, para 4.1).