23.11.26

Deadline 1 - Written Representation: the term "recycled effluent" and similar terms

Hampshire Water Transfer and Water Recycling Project (WA010002)

Water Matters Community (and also on behalf of SOSCA and [redacted])

Unique PINS references: [redacted]

Use of artificial intelligence: Claude (Anthropic), an AI assistant, was used to help review and finalise this written representation. It worked from the Examination Library documents cited (APP-007, APP-023, APP-057, APP-098, APP-101, RR-018, RR-294, RR-354 and PDA-036) and the ISH1 transcript (EV5-004). It also helped us find the published documents cited in the footnotes. We confirm that the representation is accurate and take full responsibility for it.

1. Why we are writing

- At Issue Specific Hearing 1, the Applicant objected to the words "recycled effluent" being used by interested parties. The Applicant offered to put a glossary of "correct terms" in its post-hearing note.[1]
- We use "recycled effluent" in our Relevant Representation (RR-354). So do [redacted] and SOSCA (RR-294). This note explains why the term is accurate, and what we ask the Examining Authority to do.

2. Our position in short

- We accept that "recycled water" is the Applicant's preferred name for the final product.
- We do not say that sewage or untreated effluent would go into the reservoir. We say that recycled effluent would: treated effluent from Budds Farm that has been through the recycling plant.
- "Recycled effluent" describes where that water comes from and what the process does. It is not inaccurate, and it is not meant as abuse.

[1] Issue Specific Hearing 1 (12 November 2026), Part 2, transcript (EV5-004). The objection is at about 00:09:55 to 00:12:39; the definition of effluent and the offer of a glossary are at about 00:21:00 to 00:21:54.

- Where the water comes from matters to this examination. It is why the reservoir's current chalk-spring water permissions are engaged, and why customers want to know what would be in their supply.

3. The Applicant's own words support the term

- At the hearing the Applicant said that "effluent refers to flow leaving a wastewater treatment works", and that the Water Recycling Plant is supplied with the highly treated wastewater leaving Budds Farm Wastewater Treatment Works.
- On that definition the plant's source water is effluent, and the plant recycles it. "Recycled effluent" says exactly that.
- The application says the same. The Environmental Statement describes the plant's intake as "the final treated effluent from Budds Farm WTW".[2] The draft Order authorises a pipeline "to transfer treated wastewater" to the plant.[3] The Applicant's glossary defines recycled water as "produced by taking treated wastewater and removing remaining impurities".[4]
- National policy uses the term too. The National Policy Statement calls this technology "effluent reuse".[5] The Applicant acknowledges this: "water recycling (called effluent reuse in the NPSWRI)".[6]
- Southern Water has used "effluent" for both ends of the process. Its 2023 consultation response says the plant will monitor "the treated effluent from Budds Farm".[7] Its pilot-plant data label the plant's intake "Budds Farm WTW Treated Effluent" and its output "Budds Pilot UVAOP effluent".[8]
- Southern Water's own earlier water resources management plans named these schemes by their source. For example, its 2009 plan called them "wastewater recycling" schemes.[9] Its 2013

[2] Environmental Statement, Chapter 19 Water environment (APP-098), para 19.8.106 (p. 221). Para 19.8.91 also refers to the Budds Farm "final effluent permit".

[3] Draft Development Consent Order (APP-023), Schedule 1, Work No. 2(a).

[4] Environmental Statement, Glossary and abbreviations (APP-101), "Recycled water" (p. 28). The same glossary refers to the Budds Farm "final effluent channel" ("Eastney Transfer Tunnel", p. 9). The Application Glossary (APP-007, pp. 39-40) says a long sea outfall exists "to dilute and disperse effluent safely".

[5] National Policy Statement for Water Resources Infrastructure (July 2025), paras 2.6.15 to 2.6.17, under the heading "Effluent re-use and other infrastructure".

[6] Case for the Project (APP-057), para 2.4.13 (p. 15).

[7] Southern Water, WRMP 2024 Statement of Response, Annex 5.1 (August 2023).

[8] Southern Water, Budds Farm pilot data summary (26 August 2024); released under EIR 2309, 8 November 2024. A copy was filed by Water Matters at Procedural Deadline A (PDA-036).

[9] Southern Water, Final Water Resources Management Plan 2010–2035, Main Report (October 2009), section 8.3.2.2 "Wastewater recycling" (pp. 8-8 to 8-9). The plan also names, for example, the "Aylesford wastewater recycling scheme" (p. 10-71).

draft plan described "recycling cleaned wastewater".[10] Its 2019 plan described reuse options as transfers of "treated effluent", and referred to "water (effluent) reuse".[11] "Recycled effluent" is the equivalent description in two words.

- So does the review that the Applicant relies on. The University of Brighton's report on the pilot plants calls the source water "treated effluent", and calls the water leaving the final treatment stage "the UVAOP effluent".[12]
- The economic regulator uses the same language. Ofwat's 2019 price review set Southern Water a performance commitment named "Effluent re-use", measured in volumes of "treated effluent".[13]
- A supporter of the Project used a similar term at the hearing. [redacted], for the Upper Itchen Restoration Community Interest Company, said that almost all of us are "drinking recycled wastewater". The Applicant did not object. It thanked him for a "most helpful intervention".[14]

4. The choice of words is not neutral

- Published research finds that the name given to this water changes how readily people accept it. In one experiment the same product (the authors call it "treated effluent") was described as "recycled water" to one group and as "treated wastewater" to another. Willingness to use it was reliably higher under "recycled water".[15]
- Research commissioned by the Drinking Water Inspectorate reached the same conclusion for the UK. Its 2022 survey found that "terminology has a stronger influence on levels of support for water recycling than scheme configuration". It recommended terminology "that avoids unnecessarily emphasising a link with wastewater or sewage".[16]

---

[10] Southern Water, Water Resources Management Plan Consultation, May–August 2013 (the consultation document for the draft 2014 plan), under "Water re-use" (pdf page 30).

[11] Southern Water, Water Resources Management Plan 2019, Annex 6: Options Appraisal (December 2019), pp. 65 to 68 (for example, "transfer of treated effluent from Sandown WwTW (currently discharged to sea)") and p. 71. See also the Technical Overview (December 2019), section 7.4.4.

[12] Mayor-Smith, I. (2024) Reflections on Water Recycling Pilot Plant Performance, University of Brighton, pp. 14 and 16. The Environmental Statement relies on this review: Chapter 19 (APP-098), para 19.8.106, reference 77. We cite it here only for its wording.

[13] Ofwat, Consolidated PR19 final determinations: Southern Water - Outcomes performance commitment appendix, section 1.2.3 "Effluent re-use", performance commitment PR19SRN_WWN07 (pp. 61-62). That commitment concerns non-potable re-use. We cite it only for the terminology.

[14] Issue Specific Hearing 1, Part 2, transcript (EV5-004), at about 00:08:16 to 00:09:43 (Dr Burton) and 00:09:55 (the Applicant).

[15] Menegaki et al. (2009), "What's in a name: Framing treated wastewater as recycled water increases willingness to use and willingness to pay", Journal of Economic Psychology 30(3), 285-292 (abstract).

[16] Public Perception of Water Recycling for Drinking Water Use, Project Report for the Drinking Water Inspectorate, ref. DWI 70/2/348 (25 November 2022), Summary (p. ii). See also section 2.3.1, "Framing & terminology" (p. 15).

- "Recycled water" is therefore not a neutral technical label. It is the more favourable of two descriptions of the same thing. We make no claim about the Applicant's reasons, but one party's preferred wording should not decide the words others may use.
- People are entitled to be told plainly where the water comes from. Those most affected were not properly consulted (RR-354, Section 2), and the public's response to drinking water derived from effluent is an effect we asked to be assessed (RR-354, Section 10(b)).

5. We explained our terms from the start

- [redacted] Supplement (para 1.3) and SOSCA's representation (para 4.1) each said that "recycled effluent" is their term for what the Applicant calls "recycled water", and that the Applicant's term is kept when quoting the Applicant.
- Our representation uses the term in the same sense.
- We propose to go on using "recycled effluent" in our submissions, and will keep the Applicant's term when quoting the Applicant.

6. What we ask

- That the Examining Authority note that "recycled effluent", "recycled wastewater" and "effluent recycling" are fair descriptions of the source and the process.
- That any new glossary from the Applicant be treated as the Applicant's own usage, and not as settling the words Interested Parties may use.
- That Interested Parties be able to comment on the glossary, and that it record both terms.