**Hampshire Water Transfer and Water Recycling Project**
**Issue Specific Hearing 1 (ISH1) – Water Environment**
**Summary of Oral Representations made on 12 November 2026 on behalf of Havant Borough Council and East Hampshire District Council**

This submission provides a summary of the oral representations made by [redacted] ([redacted]) on behalf of Havant Borough Council (HBC) and East Hampshire District Council (EHDC) during Issue Specific Hearing 1 on 12 November 2026.

**Article 5(8) of the Draft Development Consent Order**
Concerns were raised regarding the wording of Article 5(8) of the draft Development Consent Order (DCO), particularly its potential implications for existing planning conditions associated with the existing reservoir consents and the ability of the Councils to enforce them.

The Applicant has agreed to provide further written clarification on this matter. HBC and EHDC are awaiting this information and are reserving their position until it has been received and reviewed.

**Water Quality, Contaminants of Emerging Concern and Monitoring**

The Examining Authority's request for additional information from the Applicant was welcomed, together with the Applicant's commitment to provide this at Deadline 1. This information is considered important in addressing some of the outstanding questions regarding the assessment of water quality impacts.

Reference was made to the *Gateshead principle*, acknowledging its relevance and the role of separate environmental regulatory regimes. However, paragraph 3.8.3 of the National Policy Statement for Water Resources Infrastructure (NPSWRI) still requires consideration of the impacts of the proposed use. The *Gateshead principle* does not remove the requirement under paragraph 3.2.5 of the NPSWRI, together with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, to examine the environmental information and reach a reasoned conclusion on significant effects.

In relation to water quality, reference was made to paragraphs 19.8.104 to 19.8.108 of ES Chapter 19, which discuss the results of the pilot plant testing. These indicate that approximately 60% of contaminants of emerging concern (CECs) were reduced to below detectable levels, meaning that approximately 40% remained detectable. Questions therefore remain regarding how the conclusions within the ES have been reached, and it is hoped that the additional information being provided by the Applicant will help clarify this.

It was also hoped that the additional information would help establish whether adaptive monitoring and review arrangements are necessary, as these do not appear to have been adequately addressed within the information currently available.

Concerns therefore remain regarding CECs and per- and polyfluoroalkyl substances (PFAS), particularly given the continuing uncertainty surrounding their potential effects on human health. Reference was also made to a BBC Article which referenced an

Environment Agency report publicised on 12 November 2026, which further highlights the importance of keeping the evidence and monitoring arrangements under review as scientific understanding develops.

The Applicant's commitment to provide further information is welcomed. HBC and EHDC will review this once received and provide further comments as necessary, particularly in relation to the assessment of CECs and PFAS and the need for adaptive monitoring throughout the operational lifetime of the development.