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Date: 29 August 2019 |

Dear Sir/Madam, |

PR19 Draft Determinations: Southern Water draft determination

We welcome the opportunity to respond to the PR19 draft determination engagement process. Test Valley is a member of the Partnership for South Hampshire (PfSH) and we are working with partners through our PfSH Water Quality Working Group (WQWG) (which includes Southern Water, Portsmouth Water, Natural England and the Environment Agency) on planning for future water resources and wastewater treatment capacity alongside delivery of planned development. Test Valley is also one of a number of Hampshire authorities affected by the current issue of high levels of nitrogen and phosphorous entering the Solent which is having an adverse impact on the designated nature conservation European sites. Natural England has advised that due to this issue, new residential development (together with overnight accommodation and major tourist attractions) should be nutrient neutral. The role of Wastewater Treatment Works (WwTW) in removing nutrients, needs to be part of the solution to this issue. Romsey WwTW which serves our area is one of those identified as being affected by Southern Water's misreporting and below standard of management, operation and performance in recent years.

Although Southern Water's current involvement and positive engagement through the PfSH WQWG and their commitment to address past shortcomings has been very welcome, we would like to see this taken into account within the PR19 process. Past actions by Southern Water in South Hampshire may have caused potential harm to the environment and this should be reflected through an increase in the allowance identified for Water Industry National Environment Programme (WINEP) obligations. Whilst a fine has been imposed by OFWAT, this will not in itself address any historic harm caused.

Page 30 of the consultation document highlights that Southern Water has been less efficient in a number of aspects regarding WINEP including: conservation drivers, wastewater investigations and phosphorous removal. Taking this into account, together with past under performance and the current issue of nutrients adversely impacting on the Solent, further allowance should be made.

WwTW are a major contributor towards nutrients entering the Solent and whilst local planning authorities are investigating potential mitigation options to achieve nutrient neutrality (including strategic off-site solutions) increased investment by Southern Water in measures such as enhanced nitrogen stripping technology, together with other measures such as: provision of wetlands downstream of WwTW, and catchment sensitive farming (including potential nutrient trading), would be of great benefit to the overall delivery of a mitigation strategy.

As the need to address nutrient neutrality in the Solent is both a critical and immediate issue, this should if possible, be considered further within current the PR19 process (for 2020-2025), rather than awaiting the next round of forthcoming determinations under a future PR24 (for 2025-2030).

Yours faithfully

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Councillor Nick Adams-King, Deputy Leader and Portfolio Holder for Planning and Transport