

From: RAPID
Subject: FW: Friends of the Ems (FotE) response to Ofwat / Rapid Havant Thicket Second Gate Draft Decision

From: [redacted]
Sent: 11 April 2022 16:24
To: RAPID <RAPID@ofwat.gov.uk>
Cc: [redacted]
Subject: Friends of the Ems (FotE) response to Ofwat / Rapid Havant Thicket Second Gate Draft Decision

FotE Response to Ofwat/Rapid Accelerated Gate 2 draft decision April 2022

Dear, OfWat/Rapid,

Friends of the Ems (FotE) refers to its previous letter to Ofwat responding to the 'Strategic regional water resource solutions: Accelerated gate one final decision for additional solution, raw water transfer from Havant Thicket'. In this letter it highlighted its extreme concern regarding the complete lack of consideration of local impacts and implications of the bulk transfer of water from the Havant Thicket Reservoir away from local Chalkstreams of the area - specifically the River Ems.

Friends of the Ems (FotE) have continuing significant concerns about the environmental and ecological issues associated with the **alternative water resources necessary to support the option B.4** to be developed beyond accelerated Gate 2. In particular the concerns we are addressing are the those relating to the local environmental impacts and implications of the overall Havant Thicket Water transfer scheme on the River Ems, other local chalkstreams and in particular the underlying Chichester Chalk Block aquifer which appear to continue to be ignored in this Gate 2 draft decision.

We note that the performance by Southern Water (SW) and Portsmouth Water Company (PWC) in the Environment Assessment Area is deemed poor in the draft decision. We share the concern expressed in the decision but cannot easily pass comment on the Environmental issues raised because of the brevity of the notes in the relevant Appendix. There is no access to more detailed comment by the Environment Agency(EA) or Natural England(NE).

Particularly in the appendix for the decision for Havant Thicket Raw Water Transfer FotE would ask the following:

- Number 8 Environment/Priority Actions, does this refer to/include the Ems catchment?
- Number 15 Environment/Priority Actions, again do the assessments (SEA & HRA) and guidance (WFD) include the Ems catchment?
- Number 16 Environment/Priority Actions, meaning unclear.
- Number 10 Environment/Actions, does this include Ems catchment data?
- Number 13 Environment/Actions, should presumably include impact on the Ems catchment?

Number 13 Environment/Recommendations, hopefully it is assumed that the Ems partnership as currently functioning is included but this should be explicitly stated?

Unfortunately our request to Ofwat/RAPID for the details of the EA and NE review comments to enable us to clarify the above were not made available. If consideration of the Ems catchment is not considered the question to OfWat would be why not?

FotE will not repeat the background information outlined in our previous response, OFW034299. Thank you for your reply to our comments and for your description of the process to be used about which we remain fully informed.

Picking up on your possibly revealing paragraph 7 of the Ofwat reply that “decisions will be made on which solution/combination of solutions provides the best value taking into account environmental considerations overall”. It is unclear how broad this consideration will be? The breadth of these environmental considerations must include the catchments that will be impacted directly and indirectly including the river Ems and given the priority recommended by DEFRA, the EA, NE and the South Downs National Park (SDNP).

In addition to an existing current supply of 30MI/D, additional sourcing of a further 9MI/D from other sources and efficiencies and then the new reservoir is committed to provide an additional 21MI/D totalling 60MI/D. A further 15MI/D will be supplied via the proposed water Recycling Plant at the Budd’s Farm Wastewater Treatment Works. This would bring the water transfer by PWC to SW to 75MI/D. Needless to say these will only be available at such time that the entirety of Options D-2 and B-4 are commissioned currently estimated to be 2029 at the earliest.

You also rightly raise the issue of temporary water resources and it is important to clarify what these are, their origin and whether they include existing volumes already outlined or whether they are in addition? Should these temporary sources in anyway rely on transfer West from the River Ems/Chichester catchment we would seek reassurance that full consideration has been given to the issues adversely affecting the Western Streams, including the Rivers Ems and Lavant, and Chichester Harbour. Necessarily, this is covered by the statement in your reply to OFW034299 that “the environmental assessments will be focused on the environmental impacts of the provision of the pipeline link **and abstraction from any source used on an interim basis.**”

Back to the draft Gate 2 decision and it is confirmed that the desalination plant will not be a part of the solution to the Section 20 Agreement. We note from Southern Water (SW)’s Water Resource Management Plan 2019 (WRMP19) that there is to be a new bulk supply from Bournemouth Water (20MI/d) in addition to the Portsmouth Water contribution of a further 9 MI/d from Portsmouth Water (this may arise due to ‘efficiency gains’ but we are also aware may come from increased abstraction from the Chichester Chalk block). **We note in the draft Gate 2 decision that “peak DO (presumably DO values) was presented inconsistently”** as is evidenced by the above figures. Consideration of wider resilience is noted as lacking (4.3.5 Environment Comment draft decision), of particular concern in the case of the Ems catchment where 40-50% of the River does not flow unless there is significant annual rainfall and where the ecology continues to be adversely affected by current abstraction practices.

The over abstracted nature of the River Ems is irrefutable and is confirmed by the EA itself and fully supported by the range of metrics used to assess abstraction levels and environmentally sustainable river flows (EFI, A%R etc.). Using these indices puts the River Ems in the worst 20-30% of chalk watercourses in terms of over abstraction and environmentally sustainable flow. Significantly, also, the threats to the River Ems due to over abstraction are a local reflection on the overall status of the Chichester block chalk aquifer from which all of Portsmouth Waters Company's water is currently abstracted .

The overall status of chalkstreams in UK is of national concern with over-abstraction being perhaps the key issue to be addressed. The Catchment Based Approach's (CaBA) Chalk Stream Restoration Group is a subgroup of the National Support Group on which Ofwat is a representative. CaBA's 2021 Chalk Stream Restoration Strategy moves a step closer to meeting the government's 25 Year Environment Plan. The plan has a target of 75% of England's chalk streams to get to their natural state as soon as practicable.

It is therefore of critical importance that considerations by water resource planners are mindful in particular of the direct and indirect impacts of proposals on associated water resources and chalk streams in particular. To date this proposal has failed to address this issue . Any such identified impacts should be considered as "showstoppers" until effective mitigation is inbuilt to the proposal .

Ongoing discussions and actions between FotE, PWC and the EA are exploring the possibilities of future potential actions to utilise water from Havant Thicket to enable reduction in abstraction from the chalk aquifer at certain times of the year when seasonal flows in the river are low . However whilst these are only exploratory they are not reflected in any way in the proposal or the draft decision .

FotE's concerns about the use of abstracted water supplies from the River Ems catchment to partially cover the SW supply deficit remain. It is unclear from the Gate 2 draft decision whether the wider environmental and ecological issues as they affect the River Ems catchment are being fully addressed. Please would you address our specific questions and clarify the reach of the general environmental actions and recommendations. We look forward to hearing from you. Many thanks.

Yours faithfully,

[redacted] on behalf of Friends of the Ems

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