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From: Rowlands Castle PC <clerk@rowlandscastlepc.org.uk>
Sent: 05 April 2022 15:17
To: RAPID
Cc: [REDACTED]
Subject: Response to Consultation on Strategic Regional Water Resource Solutions: Accelerated Gate Two draft Decision for Havant Thicket Raw Water Transfer 2022.04 RCPC Letter re Ofwat Consultation on Options B.4 and D.2.pdf
Attachments:
Categories: [REDACTED]

Dear Sir/Madam

Rowlands Castle Parish Council (RCPC) has considered the consultation document *Strategic Regional Water Resource Solutions: Accelerated Gate 2 Draft Decision for Havant Thicket Raw Water Transfer*, produced by Ofwat concerning the Havant Thicket Raw Water Transfer Solution with 2 options (Option D.2 and Option B.4) for addressing deficits arising from abstraction licence reductions on the Rivers Test and Itchen.

Havant Thicket Reservoir (HRT) is on the border of Rowlands Castle Parish and Havant Borough Council. It has decided unanimously that the proposed plan by Southern Water to send recycled effluent to the Reservoir is unacceptable, both to RCPC and to the residents it represents, very many of whom have expressed grave concerns to the Council.

The attached letter expresses the many concerns felt by RCPC and residents of the Parish in detail and Ofwat is requested to really take note of and understand why Option B.4 in particular is unacceptable. Three of the key reasons are:

1. The original and only declared purpose of the approved HTR project is to store surplus water emanating from chalk aquifers during the winter months. The storage of high quality water is not only very sensible but provides the opportunity to develop a unique wetland environment with supporting visitor infrastructure that has enthused local people to support the reservoir project. The new proposal to significantly reduce the water quality by mixing it with partially treated effluent will trash the proposed excellent wetland environment that should have resulted and adversely impact water courses below the reservoir as well as the coastal European Protected Sites. This is just not acceptable.
2. The scheme to produce recycled water has very high energy and chemical use with resultant high cost. Customers are concerned about the huge amount of energy (with high carbon output) and chemicals needed to operate this plant and pump the water more than 35km to Otterbourne. This will have a huge environmental impact. With energy and chemical prices soaring this will be a burden to customers for the next 70 years+ and this option is not in line with government or water company policy on achieving net zero carbon at a time of long term climate emergency. Ofwat should recognise this and not support the scheme.
3. The Council notes that within the consultation document Ofwat is particularly concerned that:
 - There has been insufficient stakeholder engagement, particularly with customers who will receive source or recycled water. (Note that RCPC considers that direct stakeholder engagement with the wider community on the detail of the proposal has been almost wholly lacking)
 - There has been insufficient progress made in the work to carry out key environmental assessments including Strategic Environmental Assessment, Habitats Regulations Assessment and Water Framework Directive assessment.
 - There is insufficient environmental monitoring data to understand environmental impacts and risks.
 - There has been insufficient consideration of impacts of potential pipeline routes.

- There is insufficient evidence on the impacts of the WRP on chalk catchments.
- There has been insufficient sampling to provide seasonally representative characterisation to inform Drinking Water Safety Plans (DWSPs).

With so many concerns expressed in the Consultation Paper by Ofwat itself, RCPC is surprised that Ofwat is still prepared to consider the project as viable and well-run when, clearly, it has been poorly developed and not discussed honestly and openly with the population in general.

As you will understand from the attached letter, RCPC completely opposes the implementation of Options B.4 and D.2 and suggests that Ofwat focus on the Option B.5 (75 Megalitres/day (Ml/d) Recycled water from Budds Farm WwTW and Peel Common WwTW sent to an Environmental Buffer Lake and treated at Otterbourne WSW) as a more acceptable option in environmental and long-term costs if there is a need (and an approved process) to use recycled effluent.

Yours faithfully

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