

From: RAPID
Subject: FW: Strategic regional water resource solutions: Accelerated gate two draft decision for Havant Thicket raw water transfer

From: [redacted]
Sent: 11 April 2022 15:36
To: RAPID <RAPID@ofwat.gov.uk>
Subject: Re: Strategic regional water resource solutions: Accelerated gate two draft decision for Havant Thicket raw water transfer

I am writing to comment on the consultation document *Strategic regional water resource solutions: Accelerated gate two draft decision for Havant Thicket raw water transfer, OFWAT March 2022*.

I am concerned that in Section 3.3.5 of that document, OFWAT state that the environmental assessment by Portsmouth Water and Southern Water of the proposals is considered to be poor and “the submission fell considerably short of meeting expectations in many areas”. I consider that these proposals should not go forward and that alternatives should be sought.

It appears to me that a scheme involving storage of recycled effluent within the Havant Thicket Reservoir is likely to have significant impacts on the previously approved plans, to the extent that the planning approval and Natural England licences for the reservoir should be reversed. The carefully considered ecological conditions of the reservoir as originally planned included consistently low mineral nutrient levels of the water and fluctuating water levels, both of which are likely to be adversely impacted by the recycled effluent proposals.

The recycled effluent from the proposed reverse osmosis plant is likely to vary in its content of mineral nutrients. As a result, there would be a risk of accumulation of nutrients in the reservoir, risking eutrophication in periods of drought and loss of biodiversity.

Section 3.3.6 of the consultation document clarifies that OFWAT considers that insufficient sampling has been done to show possible seasonal variations in the effluent water quality. Again, in Section 4, OFWAT states that there has been “insufficient environmental monitoring data to understand environmental impacts and risks” and also “there has been insufficient consideration of impacts of potential pipeline routes”, among other concerns. This is a most unsatisfactory basis on which to proceed to further advancement of these proposals.

There appears to be no information available on the extent to which the Havant Thicket Reservoir might be used to store recycled effluent under non-drought conditions. It would seem to me that such information is essential before the scheme can be evaluated.

The entire scheme would appear to be at odds with the aspirations of the government and water companies to achieve net zero carbon impacts and net biodiversity gain.

I believe that there is considerable public distrust of Southern Water to manage effluent recycling to a consistently high standard and also significant public distaste for drinking recycled effluent water. However, there has been insufficient independent consultation with the public over these aspects of the proposals.

I am willing to have my representations published by OFWAT on its website.

Yours,

[redacted]

[redacted]

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