

**From:** RAPID  
**Subject:** FW: Accelerated Gate 2 Draft Decision for Havant Thicket Reservoir Raw Water Transfer - Consultation Response  
**Attachments:** Response to Ofwat consultation April 2022.pdf; Appendix C&D\_letter to PW Feb 2022\_for Ofwat response 11april2022.pdf

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**From:** [redacted]  
**Sent:** 11 April 2022 17:12  
**To:** RAPID <RAPID@ofwat.gov.uk>  
**Subject:** Accelerated Gate 2 Draft Decision for Havant Thicket Reservoir Raw Water Transfer - Consultation Response

Dear sir / madam,

I object to the Southern Water proposal to pump recycled effluent to the Havant Thicket Reservoir (Option B4) and I do not support the continued funding of this project by Ofwat. The options appraisal process has not been robust, if the environmental assessment and Habitat Regulation Screening had been done properly then the scheme should have been rejected and not proceeded through Gate 2.

I also object to and do not support the Option D2 proposal for a 35km pipeline from Havant Thicket Reservoir to Otterbourne. The operation of which will have significant adverse impacts on the environmental and community benefits to be delivered by the reservoir. More regular and prolonged drawdown events will adversely impact water quality, biodiversity net gain and recreational value. Pumping water 35km at a time of climate emergency, when energy costs are rocketing cannot represent best value for the environment, nor customers. For more information refer to Appendix A.

I commend Ofwat for highlighting the deficiencies with the Southern Water work completed to date set out on page 20 of the consultation document. These demonstrate the assessment process has not been robust. In relation to Option B4 I am very concerned that:

- The discharge of recycled effluent into the reservoir in conjunction with the change in the operating regime (turnover & water level) will have an adverse environmental impact on reservoir water quality, ecology and biodiversity net gain. This will mean that the benefits and net-gain committed to as a part of the original spring fed reservoir proposal will be lost or unacceptably diminished. It may even have an adverse impact on the recreational amenity value of the reservoir for the local community. The local community have indicated to me that they believe they have been misled and feel let down by the water companies.
- The impacts on water quality of the new filling regime and changes in turnover will have an adverse impact on the compensation discharge which flows via the Riders Lane & Hermitage Streams to Langstone Harbour (SPA, SAC & RAMSAR). This will remove or diminish the benefit to the European designated site which the original spring fed reservoir would have provided. This is an in-combination affect that when considered in the context of the Habitats Regulation Screening should have resulted in the rejection of the scheme, but Southern Water have not even considered the impact on the compensation flow or harbour.
- The energy, chemical and carbon costs associated with the daily treatment, and pumping of water more than 35km over a period of more than 70 years make this an extremely environmentally unfriendly and unsustainable solution, which does not provide best value for the customer, nor the environment, especially given spiralling energy costs. This solution uses the same energy, chemical and carbon hungry technology as desalination, it still produces a concentrated liquid effluent which must be discharged into our sensitive coastal waters, and the treated water must be pumped even further to where the water is needed in the Southampton area. Desalination is now rejected by the company as being too environmentally unfriendly and an option of last resort, so should effluent recycling.
- This is a very high-risk option. Southern Water have not undertaken sufficient work to be confident that the solution can be delivered, potential showstoppers and risks still exist. As the company do not have a clear idea of the environmental impacts or risks the construction and operational cost of this very expensive scheme can only spiral. Southern Water have already wasted 5 years of time and customers money pursuing the desalination scheme at Fawley, when it should have been obvious it was not environmentally viable, it was certainly pointed out to them by stakeholders & customers. Ofwat should not allow the company to waste more time and customers money pursuing this option which is effectively the same.

- I have spoken to many people on site from the local community who have expressed the view that they do not want to drink water containing recycled effluent and are concerned that it will taste different. Given that the water will taste different there is a significant risk that consumers will reject the water, knowing where it comes from, and turn to bottled water instead. This has wider economic and societal impacts, but also brings into question the issue of whether the water will be considered wholesome.
- There has been a complete lack of stakeholder and community consultation on this proposal. The very limited engagement undertaken has been biased by respondents first being presented with a one-sided view of the plans, with assurances provided by Southern Water on the lack of environmental impacts which they are completely unable to substantiate, as the environmental assessments and modelling has not yet been undertaken. Local stakeholders and residents have not been given the same opportunity as other communities to object to the plans as this was not selected as a preferred option in WRMP19. There is no 'material change' in the info available that has taken place to substantiate the late selection of these options.
- Ofwat make the point on page 9 & 14 of the consultation that this is a very expensive solution, but over the medium to long-term it can be adapted to provide capacity beyond the immediate resilience requirement, to make it more cost effective, implying this is what Ofwat expect to happen to enable them to support this scheme. Increasing the capacity of the scheme will increase the adverse environmental impacts. If increasing the volume of recycled effluent is in Ofwat and Southern Water's thinking, then it is essential that the impact of the larger volumes are considered now as part of the modelled operating regimes, to ensure the impacts are fully understood and taken into account. It is not appropriate to sell this (as SW are trying to do) on the basis of the discharge into the reservoir being a small volume, when you know you want/ plan to dramatically increase the volume at a later date. The community feel they have already been misled, there must be complete honesty now as to what is envisaged in the future to inform proper modelling, assessment of the impacts and to allow genuine public and stakeholder consultation.

I do not believe that D2 & B4 are the best option for delivering more drinking water in the area. In my opinion we need to stop funding these options now before any more money and time is wasted on the schemes and instead invest in more sustainable, low carbon, environmentally friendly solutions, which work with climate change, not against it, taking advantage of higher winter rainfall. More detailed comments as to my concerns on each option are attached (Appendix A Option D2 & Appendix B B4).

Appendix B (B8) includes some comments on the Ofwat document. If Ofwat are minded to continue funding support for Option D2 and B4 it is essential that any approval contains binding conditions to:

- a) Deliver the water quality modelling, Habitats Regulation Assessment and Environmental Impact Assessment for the reservoir, streams and coastal waters as a matter of urgency. Even if this means the assessments do not initially include the pipeline routes which will not have been finalised until after the summer public consultation. The outcome of the assessments is needed urgently now to identify potential 'showstoppers' and provide factual information for evaluation by the regulators and for the public consultation. The modelling must include the initially proposed volumes / operating regimes and all potential future volumes/ scenarios, ensuring that the worst case scenario impacts are considered.
- b) Genuine unbiased public engagement which is based on factual information, not Southern Waters unsubstantiated assumptions and biased presentation of the issues.
- c) Ensure that the alternative options are fully funded and pursued with equal vigour by Southern Water in order that a viable more environmentally alternative remains available. If effluent recycling is to be pursued then taking water from Peel Common Sewage Works (Option B5) should be fully funded as it makes more sense for the following reasons.
  - It is closer to where the water is needed, reducing the length of pipeline required, which in turn will reduce construction and operational running/ pumping costs.
  - Is less distance to pump the water reducing the operational energy and carbon costs.
  - Southern Water Gate 2 Annex 5 report confirmed on page 140 that there are benefits for the water environment associated with B5 as some flows would be diverted from the Peel Common WTW long sea outfall which is a less well mixed environment than the Eastney (Budds Farm) long sea outfall.

I would propose that Ofwat fund Portsmouth Water to complete a & b (see Appendix B, B6).

I am very concerned that Southern Water have not evaluated all of the options available with equal vigour and that the scoring unfairly biased the Havant Thicket Options, for example, by not considering all of the environmental impacts, and claiming benefits that the reservoir will already deliver without the effluent recycling scheme, which is not appropriate. The company do not have a good track record on options appraisal. I believe that they are selecting the option that is in Southern Water's best economic interest, so they only want this one option on the table, such that when the environmental impacts are known there is no other viable alternative developed sufficiently to meet the demand, or their programme commitments. They will then be able to dismiss the adverse impact on the environment because they will argue that the scheme will be in the public interest to meet demand / comply with a Section 20 commitment, and there is no viable alternative. It is essential that the regulators (including Ofwat) ensure that other alternatives remain available.

[redacted]

[redacted]

*Retired Havant Thicket Reservoir Env & Biodiversity Specialist (for 12 years)*

Attachments which form part of my consultation response

1. Document with overview of objections and concerns along with:

Appendix A - Option D2: Proposal for a 35km pipeline from Havant Thicket Reservoir to Otterbourne – more detailed feedback

Appendix B - Option B4: Proposal for effluent recycling via Havant Thicket Reservoir -- more detailed feedback

2. Document containing additional information

Appendix C – Feedback on proposed planning route, options appraisal & public consultation to date

Appendix D – Feedback and concerns on other matters related to the Southern Water proposal

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