

From: RAPID
Subject: FW: Feedback re consultation on Strategic regional water resource solutions: accelerated gate two draft decision for Havant Thicket Raw Water Transfer

From: [redacted]
Sent: 06 April 2022 11:09
To: RAPID <RAPID@ofwat.gov.uk>
Subject: Feedback re consultation on Strategic regional water resource solutions: accelerated gate two draft decision for Havant Thicket Raw Water Transfer

I write as a resident of Rowlands Castle Parish and Portsmouth Water customer.

I know that Rowlands Castle Parish Council has considered the consultation document "Strategic regional water resource solutions: accelerated gate two 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. It has decided unanimously that the proposed plan by Southern Water to send recycled effluent to Havant Thicket Reservoir is unacceptable, both to RCPC and to us, the residents it represents, very many of whom like me have expressed grave concerns to the Council on this matter.

The Council's letter expresses the many concerns felt by both the Councillors and us residents of the parish who have also studied the document and I wish to both endorse the comprehensive views expressed by our Parish Council and to make my own short statement on the matter.

There are many reasons laid out in the Parish Council letter that Ofwat is requested to really take note of as to why Option B.4 in particular is unacceptable and I just want to reiterate some of them as follows:

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 us local people to support the reservoir project. I really thought it to be a worthwhile project from both a water -saving and environmental perspective. 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. It will also adversely affect the high quality water that we drink, both in taste (which is important) and probably smell. This is just not acceptable to me and my wife.

2. The scheme to produce recycled water has very high energy and chemical use with resultant high cost. Although it is probably only Southern Water customers who will have to pay the greatly increased costs of such a scheme

because of 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 I, as a Portsmouth Water customer, may also end up paying if there is an attempt to spread the costs among a wider customer base. Whether this is correct or not the fact is that this project will have a huge environmental and cost 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. There is no certainty that the proposed reverse osmosis membranes will work effectively and they are not an established process anyway in the UK as admitted by Southern Water. Ofwat should recognise the whole flawed approach to this scheme and not support it further.

3. I note 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. (I would say 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 I am 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 area's population in general.

I wish to state that I completely oppose the implementation of Options B.4 and D.2 as being damaging for many environmental reasons and because of the long-term high costs in terms of energy and chemical use plus carbon expenditure and unreliability of the reverse osmosis process. I suggest that Ofwat focus on the alternative 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 both environmental and long-term costs if there is a need (and an approved process) to use recycled effluent.

Yours

[redaction]

Resident of Rowlands Castle Parish

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