

## **Accelerated Gate Two Water Recycling**

Salmon & Trout Conservation (S&TC) was established as the Salmon & Trout Association (S&TA) in 1903 to address the damage done to our rivers and wild fish stocks by the polluting effects of the Industrial Revolution. S&TC is the UK's leading campaigning wild fish charity. We work to increase awareness of the growing need to protect our wild fish stocks and the rivers, lakes and oceans upon which they depend. Our aim is to achieve better protection for wild fish, water life and their habitats, employing policies supported by sound scientific evidence.

### **S&TC's position on water recycling:**

The challenge facing Southern Water to reduce (and in time preferably eliminate) its dependence on aquifer water is vast. There is no single 'tool' which can deliver the reductions required, the solution will involve using the whole toolbox. With that in mind, S&TC supports the proposal for water recycling to help reduce abstraction demand on environmentally sensitive chalkstreams.

There are, of course, potential negative impacts of water reuse (including implications for energy consumption and climate change and risks associated with the change from non-consumptive use to consumptive use of water depleting sensitive sites of water and reducing groundwater percolation), so trade-offs of every potential scheme must be carefully considered on a case-by-case basis. We require further details about the scheme as outlined below before we can comment more fully.

### **General concerns:**

Given Southern Water's proposals in 2019 were completely unrealistic in terms of content and timing, our confidence in Southern Water's planning process is very low. There is a requirement, under the s.20 agreement, for Southern Water to use all best endeavours to achieve cessation of excess abstraction in droughts by 2027 or as soon as possible thereafter.

Accordingly, the gate two proposals must be realistic, rigorously supported and clear. The best possible team, with appropriate experience, should have been assembled. Stakeholders should be provided with detailed and up to date information demonstrating the above if confidence in Southern Water's planning process is to be restored.

There is no publicly available information to demonstrate the above. Accordingly, S&TC submitted detailed questions to Southern Water and arranged a follow-up meeting. Both the meeting and the answers to the questions were delayed considerably by Southern Water. After finally receiving written and verbal responses from Southern Water, we still find the information provided to be inadequate and lacking transparency.

Our experience with Southern Water, with regard to gate two, supports Ofwat's concern that there has been insufficient stakeholder engagement. We have committed considerable time and resources to gain a clearer understanding of Southern Water's proposals but have received limited information in return. We are keen to work with Southern Water and help

identify and bring forward the new infrastructure, that is urgently needed, but we can only do this if we are given sufficient information.

**Concerns relating to the proposals:**

- 1) Southern Water have confirmed that they currently have no control over the proposed site (site 72) for the water recycling plant, which is intended for a major employment development. According to Southern Water, they are in communication with the owner of the site but have not yet reached an agreement or set an end date on negotiations. This is of particular concern because the site for the desalination plant identified in the lead up to the WRMP2019 turned out not to be available.
- 2) From the information provided to us by Southern Water, there is no certainty that Portsmouth Water will agree to the mixing of the recycled water with the water in Havant Thicket Reservoir. There is currently not a formal agreement between Southern Water and Portsmouth Water for the mixing of recycled water. There is also no guarantee that recycled water will be allowed to enter the reservoir, as it is still subject to planning assessments.
- 3) Given the locations of site 72, Havant Thicket Reservoir and the River Itchen, all of the required pipelines (for both the preferred option and the “back up”) will have an impact on either urban spaces or protected sites. Southern Water have refused to provide us with pipeline route corridors. Installing pipelines is fundamental to the successful delivery of any of Southern Water’s five options. For S&TC to be in a position to respond appropriately to the consultation, we need to be given the preferred route corridors.
- 4) We are concerned that water recycling is integral to both the preferred and back-up options. We share Ofwat’s concern over the impact customer acceptability could have on the viability of water recycling. Consequently, we raised this issue with Southern Water, who conceded that the “back-up option” is not a “genuine alternative”.

In answer to our questions Southern Water admitted that: “for a genuine alternative supply option Southern Water would need to turn to the Thames to Southern Transfer .... currently being selected for late 2040’s”.

The “back-up” option would involve two pipelines to the Itchen and is only being developed as a “desk-top” exercise. If water recycling is rejected by customers, both options fail. The current back-up option is seriously inadequate and does not represent the standard of back-up option required to comply with the s.20 Agreement.

When this point was discussed further, Southern Water raised a further alternative that would include just the Havant Thicket Transfer without the supplementary recycled water. This can be found in the technical documents as option D.2, an option that would only offer two-thirds of the ML/d compared with the preferred option B.4.

Given the urgency and the requirements of the s.20 Agreement it is essential that this option is pursued in any event to come on stream as soon as possible to provide at least

partial relief. We do not understand that to be incompatible with the implementation of either the preferred option or whatever other urgent back up proposals are brought forward.

### **Concerns relating to the deficit:**

There is no publicly available breakdown of Southern Water's deficit, nor can this figure be deciphered from their gate two technical documents. For this reason, it is not possible to verify whether the proposals meet the deficit. It is essential that Southern Water provide a clear, accurate and detailed breakdown of the deficit and relate how each option would cover that deficit. This should be a fundamental requirement.

When this was raised with Southern Water, they were able to provide us with the deficit figure and a breakdown of how this could be covered; although it must be noted, Southern Water still lacked certainty over these numbers. They stated the total deficit is 195MI/d. Their preferred option amounts to 90 MI/d, covering less than half of the total deficit. Even with proposed other measures taking place (outlined below) Southern Water are still unable to cover their total deficit.

- Sandown recycling scheme (9MI/d)
- Catchment solutions (50 MI/d)
- Demand management (10 MI/d)
- Portsmouth Water transfer (21MI/d) \*

\*we are still uncertain of whether this transfer makes up part of the preferred option

There is a 15 - 36 MI/d shortfall. Accordingly, it still remains, that a mixture of water resource infrastructure will be required for Southern Water to cease their dependency on natural water resources.

### **Concerns relating to timescales:**

- 1) There is insufficient information provided to demonstrate that water recycling is being pursued with the urgency required by the s.20 Agreement.
- 2) There is no adequate information on any other proposals to seek to minimise the gap between 2027 and the ending of excessive abstraction in times of drought, which is a requirement under the s.20 Agreement.

### **Concerns relating to misleading information:**

- 1) In several of Southern Water's technical documents they state that Southern Water and the Environment Agency (EA) have reached an agreement to amend the s.20 Agreement. This statement was raised by S&TC during a stakeholder meeting where both parties were in attendance. It was confirmed by the EA, that this statement was incorrect.
- 2) Southern Water submitted that, in part, they were unable to meet the commitments of the s.20 Agreement due to the Drinking Water Inspectorate's (DWI) approval process. Southern Water are fully aware that this statement is incorrect, as during consultation,

the DWI outlined that in-direct reuse is not subject to regulation 31. Neither of Southern Water's options are subject to regulation 31, thus it is an invalid justification.

**Conclusions:**

Southern Water's current dependency on natural water resources is unsustainable. In times of drought, the current system would devastate the abstracted rivers irrevocably. For this reason, S&TC supports in principle Southern Water's proposal for water recycling. There must be an urgency with the delivery of this proposal, thus S&TC is keen to work with Southern Water to assist in ensuring the proposal is delivered on time.

S&TC is proactively working to ensure that Southern Water's planning process is rigorous, to avoid unnecessary delays and mitigate impacts on the environment. S&TC has several concerns over the current planning process, project timescales and lack of back-up option, based on the information Southern Water have made available. Greater transparency is essential if consultation is to be effective and to enable S&TC to provide full responses.