

**From:** RAPID  
**Subject:** FW: Strategic regional water resource solutions: Accelerated gate two draft decision for Water recycling

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**From:** [redacted]  
**Sent:** 11 April 2022 15:37  
**To:** RAPID <RAPID@ofwat.gov.uk>  
**Subject:** Re: Strategic regional water resource solutions: Accelerated gate two draft decision for Water recycling

Dear Sirs,

I am writing to express my concern about this proposal by Southern Water to use effluent recycling and long-distance pipelines to supply drinking water to the Southampton area. It does not represent good value for money and is likely to result in biodiversity net loss. I wish to register my opposition to solutions B2, B4 and B5, as given in the consultation document *Strategic regional water resource solutions: Accelerated gate two draft decision for Water recycling, OFWAT March 2022*.

It is disturbing to find that this proposal is being advanced by using an accelerated procedure before full details have been released to the public. It is unacceptable to me that no alternative schemes are being proposed.

I regret that approval is being sought by a method that minimises the involvement of the local planning system, and thus reduces the opportunity for public comment. In my view, the exact proposed sites of an effluent recycling plant and the routes of the associated pipelines should be released to the public for consultation before any further decisions are made. It would appear that this lack of stakeholder and customer engagement is recognised in Section 4.3.1 of the consultation document.

It would appear that these Solutions are being rushed for approval in order for Southern Water to avoid financial penalties, rather than being the best long-term solutions for most other reasons. The consultation process should be paused while other alternative solutions are investigated.

Section 4.3.5 of the consultation document confirms my assessment that the environmental consequences of these proposals have not been researched or considered to the extent that should be required at this Gate 2 stage of the assessment process.

The routing of such long pipelines across the Hampshire countryside is likely to lead to widespread ecological disruption and damage. Even if care is taken to minimise damage, many hedges and tree lines are likely to become interrupted. That would risk interrupting commuting routes used by bat species, many of which are known to be reluctant to cross open areas caused by such gaps. The species affected will inevitably include the rare Annex II western barbastelle species, which ranges widely in south Hampshire. It would take many years for such gaps in tree lines to become fully restored. Furthermore, whichever of the routes vaguely indicated on the map provided might be chosen, there is likely to be considerable temporary disruption of agriculture.

The expense of installing such long pipeline routes would be huge, as would the carbon impact. The energy expenditure of pumping water over such long distances would also be a huge long-term commitment. Much shorter and more energy-efficient alternatives should be considered.

These proposals would appear to be particularly unsustainable as they are intended to be drought resilience assets. The documentation is unclear as to the extent to which they would be used in non-drought conditions.

Effluent recycling by reverse osmosis is a process requiring huge amounts of energy. The quality of the output treated water is likely to vary greatly, depending on the condition of the membranes. As stated in Section 2.3 of the

consultation document, no approved reverse osmosis membranes may be available, so the scientific and engineering basis of this proposal is in doubt. There will be a second output of water containing concentrated mineral nutrients such as nitrate and phosphate which will have to be disposed of to the sea, with adverse consequences for the ecology of the site chosen, be that the Solent or elsewhere. Such effluent recycling processes have already been rejected in the context of a proposed seawater desalination plant near Southampton, and many of the same objections apply in the case of the proposed recycling plant at Bedhampton.

The Havant Thicket reservoir is unsuitable for use as an environmental buffer in my opinion. An effluent recycling plant at Pell Common (where a pilot plant is already under operation), would seem a preferable option, if the output were to be pumped directly to Otterbourne.

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,

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