

Via email only

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**My reference:**  
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Dear Sir or Madam

## **SOUTHERN WATER DRAFT WATER RESOURCES MANAGEMENT PLAN 2024 CONSULTATION RESPONSE**

Thank you for consulting Havant Borough Council on your draft Water Resources Management Plan (WRMP) 2024 which looks ahead to how drinking water will be supplied to residents and businesses across the South East.

We support Southern Water's recognition of the increasing challenges of climate change and population growth, and the pressing need to improve and enhance the natural environment for future generations. We also welcome Southern Water's efforts to work with others including Portsmouth Water but consider that it needs to go much further in engaging with local residents and communities particularly in terms of how water supply is to be sourced in the future.

The Council fully recognises the importance of addressing the significant and urgent need to address Hampshire's water shortfall and welcomes the efforts that are being made by Southern Water to address this. However, we have concerns relating to the Hampshire Water Transfer and Water Recycling Project which includes proposals to recycle wastewater from Budds Farm Wastewater Treatment Works and transfer it into Havant Thicket Reservoir in order to boost the amount of water the reservoir could supply to Hampshire during a drought.

We have concerns relating to the use of recycled treatment wastewater as a technology which would be new to this country, and in fact the first of its kind in the UK. It is therefore of the utmost importance that the project and the proposal are correctly scrutinised to ensure it is the appropriate way to deliver safe drinking water in an environmentally responsible way.

As a Nationally Significant Infrastructure Project, the Secretary of State is the consenting authority in place of the Council as the local planning authority. As such, it is appropriate for

there to be meaningful engagement and cooperation between Southern Water, Portsmouth Water and the Council before the proposal is submitted for consideration through the Development Consent Order process.

### History of Havant Spring

The Borough of Havant is perhaps best known for its acclaimed spring water, which is regarded as one of the best examples of Chalk karst springs in the UK. In fact, this is how the town derives its name, being known in 935AD as 'Hamafunta' the spring of Hama.

For much of our history, fresh water has played a vital part in local commerce, from water mills to parchment manufacture to brewing. We are a Borough built on the remarkable natural geography of the Bedhampton Spring.

The springs are large, with a combined flow of approximately 104 000 m<sup>3</sup>/day — enough to fill 40 Olympic-sized swimming pools every day.

During the winter, much of this water flows into Langstone Harbour, excess to the drinking needs of the Borough. Indeed in 2021 I was pleased to support plans for the Havant Thicket Reservoir and a pipeline to fill it with spring water which will be the first new reservoir to be built in the South East since the 1970s.

### Havant Thicket Reservoir

The new reservoir will be a fantastic resource and will reduce the water strain on the South East. We welcome and still support the reservoir. However, throughout the process, Councillors were told that this reservoir would be filled from excess water from the Bedhampton Springs. The below extract is from Page 2 of the 121 Page planning application.

*“The reservoir, when constructed, would be filled with surplus water drawn from the springs at the Bedhampton works during the winter when flows are at their highest - via a new combined inlet/outline pipeline. The reservoir would provide water supplies to Portsmouth Water customers in the summer months as required. Additionally, it would allow Portsmouth Water to transfer water to East Hampshire to supply Southern Water’s customers, even in a severe drought.”*

Havant Borough Council has serious concerns about why Southern Water did not make clear its wish to use water recycling during the planning process for the outline planning application that concluded last summer. This would have I’m sure have had an impact on the public perception on the reservoir project and application.

### Southern Water

For residents in this Borough, they are already wary of Southern Water due to the reputational impact of the record £90million fine that it received for 6,971 unpermitted sewage discharges. Whilst the company says that it has changed, residents in this

Borough, would want to see long-lasting commitment and proven action before agreeing to a radical proposal on how our drinking water is delivered.

In addition, we have commented on various elements of the consultation below as follows.

**Do you agree that water recycling has a role to play in securing water supplies for the future?**

The process of using recycled water has a potentially high environmental impact. The Council remains unconvinced that this is the best way to tackle the water supply deficit in Hampshire. Indeed, the draft WRMP itself recognises that it is energy intensive option which could impact on the environment.

The Council considers that better demand management and increased capacity at other reservoirs would reduce the demand for water from being supplied from new sources. In particular, it is noted that Thames Water is developing plans for a new South East Strategic Reservoir which could enable up to 120 million litres per day being transferred into Hampshire. In tandem with this the draft WRMP includes proposals to increase water supplies into the west of the region through a new reservoir close to Blackstone in West Sussex.

**A new strategic reservoir is an integral part of the regional best value plan for the South East. Do you have any comments on the size of the new reservoir? Does your position change if the size of that reservoir (which will supply the transfer into Hampshire) impacts on the size of water recycling plant needed at Havant Thicket)?**

The Council does not consider the case for the Hampshire Water Transfer and Water Recycling Project has been fully developed. The fact that it is still being progressed as an option suggests that it may not be needed, or that there may be an alternative. There would appear that there is a great deal of further work to be undertaken before the next consultation on the project in the summer.

In particular, there remains uncertainty given the size and timing of the South East Strategic Reservoir which will impact on the size of the water recycling plant needed to serve Havant Thicket. The principle of the need for the water recycling plant at Havant Thicket is therefore questioned.

**Conclusion**

Whilst Havant Borough Council welcomes Southern Water's plans to address Hampshire's water shortfall, it remains unconvinced that the Hampshire Waste Transfer and Wastewater Recycling Scheme represents a sound environmental solution.

As set out in the Council's previous consultation response dated 16<sup>th</sup> August 2022 in relation to the Hampshire Water Transfer and Water Recycling Project consultation during the summer, engagement with our residents needs to be ongoing between now and the next consultation on this project in summer 2023. Water recycling is not a technology which is familiar to most in the UK. This only emphasises the need to focus on engagement as part of the proposal so that all stakeholders can respond on an informed basis. We would welcome discussions about how a package of engagement could be rolled out, focussing on raising awareness of the project and what it entails before the consultation in the Summer 2023.

Yours faithfully

*Alex Rennie*

Councillor Alex Rennie  
**Leader of the Council**