

Via email to Rt Hon Thérèse Coffey MP  
(Secretary of State for Environment and  
Rural Affairs) & Rt Hon Michael Gove MP  
(Secretary of State for Levelling Up, Housing  
and Communities)

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**My reference:**  
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Dear Ms Coffey & Mr Gove

## **HAMPSHIRE WATER RECYCLING FROM BUDDS FARM WASTEWATER TREATMENT WORKS**

I am writing to you to ensure that you are fully apprised of an emerging Nationally Significant Infrastructure Project in Hampshire, namely the proposal to use recycled water from the Budds Farm Wastewater Treatment Works to supplement spring water in the Havant Thicket Reservoir.

Havant Borough Council understands the increasing challenges of climate change and population growth, and the pressing need to improve and enhance the natural environment for future generations..

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.

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, Southern Water's draft Water Resources Management Plan (WRMP) itself recognises that it is energy intensive option which could impact on the environment.

The need for such technological solutions could also be greater reduced with better demand management. Since 2019, due to the need for all development to be nutrient neutral, Havant Borough Council has conditioned all new development to need no more than 110 Litres per person per day (L/P/D) of drinking water. This is 15L below what is required through the Building Regulations and can be achieved solely through efficient fixtures and fittings, without energy intensive technological measures. Updating the Building Regulations to require this across the country or in water stressed areas would further reduce the need for energy intensive increases in water supply. Welcome progress has been made so far within allowing local authorities to require higher levels of water efficiency. Nonetheless, Government could go further through the updates to the National Planning Policy Framework, requiring water efficiency in new homes of 100 L/P/D or less, using rainwater harvesting or grey water recycling. Furthermore, measures could be put in place so that large scale, water intensive commercial operations make extensive use of grey water sources for activities such as crop irrigation, maintenance of golf courses and within industry.

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.

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.

### 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.

Original proposals for Havant Thicket Reservoir, which have been granted planning permission

The winter storage reservoir proposals, receiving spring water from the aquifer, 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. This would have I’m sure have had an impact on the public perception on the reservoir project and application.

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.

As described above, the Bedhampton Springs has always been our main source of water. Its excess flows have made the possibility of a reservoir possible. Therefore, we are not supportive of any plans to supply this water to Portsmouth Water customers in the Borough as there is quite simply not the need.

We understand that the environmental pressures on rivers such as the Itchen and Test might mean that for Southampton residents the benefits outweigh some of the challenges that we are raising here. However, we do not see that as the case for residents in the Borough of Havant.

In conclusion, Water recycling is not a technology which is familiar to most in the UK. This in particular emphasises the need to focus on engagement as part of the proposal so that all stakeholders can respond on an informed basis. As part of this, it is critical that this information is clear, unambiguous and fully in the public domain so that all interested stakeholders can come to a considered view on the proposals.

But ultimately, we remain unconvinced that these proposals are in the best interests of Havant residents. Therefore, we are asking that when taking the next steps in deciding the Development Consent Order you consider the needs of Portsmouth Water customers and Southern Water separately. The needs and demands of the two areas are different and unique.

I look forward to hearing back from you on this matter.

Yours faithfully

Councillor Alex Rennie  
**Leader of the Council**