



## Consultation Response / Prepared by: WildFish Hampshire Water Transfer and Water Recycling Project (WTWRP)

### Summary Response

In the Hampshire region, during a 1-in-200-year drought, Southern Water estimate a water supply deficit equivalent to the water-use of 1.75 million people.\* There is a critical need for more water supply infrastructure to help protect Hampshire's chalk streams. Southern Water are obligated to use "all best endeavours" to provide that infrastructure.

#### Reservoir

Havant Thicket Reservoir is the most sustainable type of infrastructure. It is already permitted. It is essential, in accordance with the "all best endeavours" requirement, that a suitable pipeline, to transfer water from the reservoir to reduce the deficit, is in place by the time the reservoir is operational in 2029. **This must happen whether or not other infrastructure is approved or operational.**

#### Water Recycling and Transfer

There is still a lack of clear information about the size and timing of the supply shortfall and the measures proposed to meet it. What is clear is that the reservoir on its own will not be enough. We agree that, on the information available, water recycling and water transfer infrastructure is appropriate and necessary to help meet the supply shortfall. **Of the options put forward we agree that in principle option B.4 is to be preferred.** However, we do not at present have enough information to convince us that this will provide sufficient supply to deal with the deficit.

**On the information available we support the use of Site 72 to construct a water recycling plant.**

#### Pipeline Corridor:

On the information available we do not disagree in principle with the preferred pipeline corridor on the assumption that option B.4 is permitted and implemented promptly.

We are however very concerned as to how a transfer pipeline is to be provided before 2029 if option B.4 is not consented or is delayed. Three possibilities need to be considered:

- The consenting and / or implementation of the WRP is delayed,
- B.4 is not consented, and Southern Water seeks to implement their current "back-up" option instead. That is B.5 which comprises a Water Recycling Plant, sending water direct to a buffer lake at Otterbourne, without transfer and mixing in the reservoir.
- Consent is refused for a WRP. Southern Water accept there is currently no back-up planned if a Water Recycling Plant is not consented.

In each of these cases, it will be vital that a pipeline is in place by 2029, to transfer water from the reservoir to Otterbourne. The consultation is silent as to how that would be achieved. It may be that

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\* based on the 110 litres per person per day government target



the preferred corridor would still be utilised in some or all of these cases. It may be that it would need tweaking, it may be that a different preferred corridor would be used.

Whatever the position the Development Consent Order (DCO) should be drafted to provide the necessary consents to allow a pipeline to be operating by 2029 in any of these cases.

### **The Shortfall**

Transparency has improved, but there is an urgent need for a clearer explanation of the extent and timing of the shortfall in this region and how and when it is to be met.



## **Full Response**

WildFish (previously Salmon & Trout Conservation) 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.

### **Southern Water's critical problem**

The challenge facing Southern Water to reduce its reliance on aquifer water is vast. Hampshire is an acutely water stressed region, with an over-dependency on water abstractions from the River Test and Itchen to maintain supplies. During periods of drought, Southern Water does not have an alternative water resource available to guarantee public water supplies in this area. The supply deficit in this region, during a 1-in-200-year drought, is estimated by Southern Water to be 195 million litres per day. Therefore, it is critically urgent that Southern Water provides a variety of additional water infrastructure, for this region, as soon as possible. There is no single 'tool' which can deliver the reductions required, the solution will involve using the whole toolbox.

### **General Comments**

We remain wary of Southern Water's planning process given their proposals in 2019 were completely unrealistic. 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. This is the most onerous of such obligations. It means that Southern Water must take all steps that a prudent and determined person acting in their own interests and desiring the result would take, and that they must do all in their power to bring about the result, even if that means subordinating their own interests. We need to be able to see this approach being applied throughout Southern Water's planning process.

Our experience with Southern Water, during their accelerated Gate 2 proposal, supported Ofwat's concern that there had been insufficient stakeholder engagement. We had committed considerable time and resources to gain a clearer understanding of Southern Water's proposals but received limited information in return. This has substantially hindered our ability to comment fully on the proposal.

There remains a serious lack of clarity over Southern Water's supply deficit in the Hampshire region during a 1-in-200-year drought event and the extent to which, and when, their proposed measures will meet that deficit. WildFish have engaged with Southern Water over this, on several occasions, but we still lack confidence in the numbers provided during the deficit breakdown. This issue will be expanded on in more detail below.

There has been a belated improvement in Southern Water's approach to stakeholder engagement, as part of the Water Transfer and Water Recycling Project, in particular organising a site visit to Budds Farm (the starting point of the process). During this visit, Southern Water provided opportunities for WildFish to ask questions relating to the project.



## Reservoir

Havant Thicket Reservoir is the most sustainable type of infrastructure. It is already permitted. It is essential, in accordance with the “all best endeavours” requirement, that a suitable pipeline, to transfer water from the reservoir to Otterbourne to reduce the deficit, is in place by the time the reservoir is operational in 2029. **This must happen whether or not other infrastructure is approved or operational.**

## Water Recycling and Transfer

Despite the lack of clear information about the size and timing of the supply shortfall and the measures proposed to meet it, it is clear that the reservoir on its own will not be enough. We agree that, on the information available, water recycling and water transfer infrastructure is appropriate and necessary to help meet the supply shortfall.

Of the options put forward we agree that in principle option B.4 is to be preferred. However, we do not at present have enough information to convince us that this will provide sufficient supply to deal with the deficit.

On the information available we support the use of Site 72 to construct a water recycling plant.

Based on the information available, we support in principle the preferred pipeline corridor, on the assumption that the selected option (B.4) is permitted and implemented promptly. (However, as explained below, we have serious concerns about the lack of provision for a water transfer pipeline to be available as soon as the reservoir becomes operational).

## Remaining Concerns

Despite supporting the scheme in principle, we still have a number of concerns/points seeking clarity which are outlined below.

### Points relating to the water transfer

- 1) It is essential, that during the pipeline construction, all environmental impacts are minimised and/or mitigated against. Our particular concern is the potential impact on freshwater environments which are sensitive to and already suffering from chemicals, excess fine sediments, and physical alteration. All early assessment outcomes, arising from the preliminary environmental impact assessment, need to be shared in full, as early as possible.
- 2) We seek confirmation that the proposed water transfer does not have the capability of transferring aquatic invasive non-native species from one site to another, because the water transfer from Havant Thicket Reservoir (HTR) to Otterbourne Water Supply Works (OWSW) is a direct transfer, thus water does not enter the Itchen.

### Points relating to the water recycling

- 3) Southern Water’s Gate 2 submission to RAPID included a 15Ml/d supplementary flow, between the water recycling plant and the reservoir, as part of B.4. According to the latest

consultation documents there is now the potential for this to be increased to 60MI/d. An increase in supplementary flow, should result in an increase in the quantity of water transferable from the reservoir to Otterbourne. The 60MI/d option should be prioritised, with all related infrastructure developed to accommodate this increase.

- 4) There are risks associated with the change from non-consumptive use to consumptive use of water depleting sensitive sites of water. We seek confirmation that this is not applicable to the preferred option B4 because the diverted water, after processing at Budds Farm, would ordinarily be pumped into the sea, and thus it does not serve any flow augmentation purpose.
- 5) We are concerned that water recycling is integral to both the selected and back-up options. We raised this issue with Southern Water, at Gate 2, were they 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 (B.5) 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.

## Pipelines

Havant Thicket Reservoir is the most sustainable type of infrastructure, and it is already consented. It is to be substantially financed by Southern Water to help deal with the deficit. Under option D2 (which does not involve water recycling) 61MI/d would be transferred by pipeline from the reservoir to Otterbourne.

It is anticipated that the reservoir will be operational by 2029. It is vital in accordance with the “all best endeavours” requirement that a suitable pipeline is in place by 2029 to allow the benefits of the reservoir to be achieved.

We are very concerned as to how a transfer pipeline is to be provided by 2029 if option B.4 is not consented or is delayed. Three possibilities need to be considered:

- The consenting and / or implementation of the WRP is delayed. We note that even as currently planned it is not anticipated that option B4 will be operational before 2030.
- B.4 is not consented, and Southern Water seeks to implement their current “back-up” option instead. That is B.5 which comprises a Water Recycling Plant, sending water direct to a buffer lake at Otterbourne, without transfer and mixing in the reservoir. This option is not being pursued in any detail and does not include provision for a pipeline from the reservoir to Otterbourne. On current plans a change to option B5 if B4 were rejected would involve very significant delay.



- Consent is refused for a Water Recycling Plant. Southern Water accepts there is currently no back-up planned if a Water Recycling Plant is not consented.

It seems that it is almost certain that the adoption of option B4 as currently formulated will delay the benefits of the reservoir. That is unacceptable. In each of these cases, it will be vital that a pipeline is in place by 2029, to transfer water from the reservoir to Otterbourne. The consultation is silent as to how that would be achieved.

It may be that the preferred corridor would still be utilised in some or all cases. It may be that it would need tweaking, or it may be that a different preferred corridor would be used.

We also understand that it might be necessary to use two pipelines either within the same corridor or in separate corridors.

Whatever the position the DCO should be drafted to provide the necessary consents to allow a pipeline to be operating by 2029 in any of these cases.

### **Concerns relating to Hampshire' supply deficit**

There is still no publicly available numerical breakdown of Southern Water's total supply deficit in the Hampshire region during a 1-in-200-year drought. Southern Water have also failed to provide a summary of the measures they are implementing to address this deficit and how they will meet that deficit and when. This information cannot be deciphered from the WTWRP documents or the Gate 2 documents

When this was raised with Southern Water, at Gate 2, they gave us the deficit figure and a list of their proposed measures. It must be noted that Southern Water lacked certainty over these numbers. The total supply deficit, they gave, was 195MI/d. Consequently, WTWRP (90MI/d) would cover less than half of the total deficit.

From the information provided we understand the other proposed measures are as follows:

- Catchment Solutions (50 MI/d)
- Portsmouth Water Transfer (21MI/d) \*
- Demand Management (10 MI/d)
- Sandown Recycling Scheme (9MI/d)

Based on the information provided, if all measures are delivered, there is still a supply shortfall in the Hampshire region of 15-36 MI/d (during a 1-in-200-year drought event).

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



It is essential that Southern Water provides a clear, accurate and detailed breakdown of the deficit and how each measure would cover that deficit. There should be a timeline for when each measure is due to be completed. This should be a fundamental requirement.