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**WildFish response to Hampshire Water Transfer and Water Recycling Project Spring Consultation 2025**

WildFish is an environmental charity dedicated, *inter alia*, to preventing harm to the ecology of rivers from over-abstraction.

We responded to the Hampshire Water Transfer and Water Recycling Project consultation in June 2025, expressing the view that WildFish was strongly supportive of the scheme, but concerned at issues of timing and that all steps were taken to prevent pollution or other damage to waterbodies during and after construction.

In particular, our concerns were that the Environmental Impact Assessment / Preliminary Environmental Information Report were still at a high level scoping stage; the impact on protected and other rivers due to the construction of the pipeline(s) and, in particular, the river crossings, had not been assessed, both in terms of the EIA regime and HRA /appropriate assessment; a formal application for DCO, as far as we are aware, had not yet been submitted; and there was no evidence of any permit or licence applications relevant to the plan having been made: all of which made it difficult for WildFish to comment on the general, high-level description of the Hampshire Water Transfer and Water Recycling Project.

In this context, the updated consultation is seeking views on the results of modelling for water quality for inclusion with the Environmental Statement to be submitted with the Development Consent Order application.

The modelling reports contain details of "*project design refinements*" relating to predicted water quality impacts on the Havant Thicket Reservoir and Riders Lane Stream, Hermitage Stream, Langstone Harbour and the Solent as well as changes to the design of the project.

In addition to the Environmental Water Quality Report, the consultation documents include 25 Project design refinements, identified on a map, each with an information sheet which makes the changes difficult to assess. One document would have been preferable.

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We have insufficient time to respond to all details but have concentrated here on pollution control and environmental impact of the proposal on water quality, in particular the reservoir and, by implication, the downstream waterbodies.

The water quality report confirms that phosphate levels will rise due to the input of water from the recycling system to the reservoir. Although the report indicates that more detail will be provided later on the impacts of the project, *(". . this will be presented in the Environmental Statement and other supporting assessments (e.g. the HRA and WER Compliance Assessment"* (5.5.2)), the report admits that:

> *"The introduction of recycled water into the reservoir is predicted to result in a change to reservoir water quality. Concentrations of phosphorus and carbon compounds are predicted to increase, reflecting the higher concentrations of these compounds in the recycled water in comparison to the spring water. As a result, phytoplankton growth is expected to increase. Para 3.1.19*

We believe that no or little in the way of phosphates should reach the reservoir and the reliance on the "bubbler" system is unsatisfactory. We have concerns over the general standard of treatment that is proposed. We do not believe that there is sufficient detail yet and the goal should not be for post-pollution mitigation but for treatment which prevents any polluting material from entering the reservoir, including but not limited to the standard analysands of ammonia and phosphorous, but also microplastics etc. The reservoir will have a limited capacity for phosphates and there could be serious legacy issues from phosphorous which collects in the sediment of the reservoir and become available in the warmer seasons of the year. This does not seem to have been considered.

We note at paragraph 5.2.15 that the reservoir would be expected to "shift to a eutrophic state following the introduction of recycled water"; increases in cyanobacteria and presumably causing problems downstream. Further measures to reduce TP concentrations are intended for the the recycled water but this would be considered later in the DCO application; the applicant would work "with the Environment Agency to determine how these measures are best introduced".

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The same delayed assessment is proposed for discharges at Eastney. In our June 2024 response, we raised concerns at the discharges at Eastney Long Sea Outfall and associated Eastney Transfer Tunnel which would accept "reject water" from the proposed WRP.

We note section 6 of the report deals with potential environmental effects associated with the Eastney LSO but that the "preliminary modelling" rules out water quality changes from releases to the Solent.

The concentrated pollution, we suggested, should be subjected to further processing before release. That was because the Solent holds a number of Marine Protected Areas: a maritime Special Area of Conservation (SAC); four Special Protection Areas (SPAs), three Ramsar sites and three Marine Conservation Zones (MCZ). All of this should have been properly considered by now *before* the DCO is considered by the Inspector.

The issues of contamination and dispersal as well as environmental effects have obviously been subject to some detailed modelling. But, again, we fail to see why there appears to be a working assumption that there will be no further treatment of the recycled water – both before release into the reservoir and in relation to the Eastney discharge - to ensure that the risk of pollution is reduced as far as possible. Such issues should be dealt with now rather than waiting for the DCO submission. We also believe that it is important that the full details of permitting by the EA are dealt with now rather than later as they should be aligned with the modelling.

**Watercourse Crossings**

In the May 2024 consultation, the Water Environment Chr 19 Annex to the Preliminary Environmental Information Report explained that the pipeline from Havant Thicket reservoir and Otterbourne WSW to the east must cross north-south flowing watercourses that rise on the South Downs and drain to the Solent in the east, and Southampton Water in the west, including:

Potwell Tributary
Wallington River
River Meon

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River Hamble
Moors Stream
Horton Heath Stream
Bow Lake
Itchen Navigation
River Itchen SAC
Hermitage Stream

Pipelines between the WRP and Havant Thicket reservoir will also need to cross Hermitage Stream.

We noted in our response in June 2024 that although the river crossings are described in the non-technical Preliminary Environmental Information Report as "trenchless" – which involves tunnelling under the rivers and the laying of pipes - there are nevertheless risks identified which will need to be described in the full ES/HRA/AA assessments. Any assessment of impact would need to include the construction phase risks, given that large open sites will be required around the crossing points, to avoid sedimentation and pollution, both to the groundwater aquifer and the main rivers. Timing of the works will be crucial given that some of these rivers hold migratory fish. Due to the tight timetable for compliance with the section 20 Agreement, we presume that the next steps will be taken as a matter of urgency.

Although there have been some operational changes to the tunnelling, we still see that there are works intended in riparian habitat (for instance, see "Figure 38 River Hamble and Ford Farm – Design Refinement"). We have not been able to locate the detail of how risks of pollution (e.g. sediment run off) will be considered.

**Overall**

WildFish's overall view is that this project must be supported as long-term measures are required to meet the obligations to end reliance on drought permits and orders, to increase the availability of water resources and resilience, but also to prevent impacts from over-abstraction on the chalk streams of Hampshire.

However, as above, we believe that detailed assessments ought to be undertaken now and that the aim should be to reduce phosphate and other pollutant levels to nil.

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We therefore support the scheme conditionally on the basis that detailed assessments are undertaken and steps taken to prevent pollution or other environmental damage during the construction phase and beyond, before the DCO is submitted.

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March 2025

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