

Via email only

Enquiries to: Councillor Alex Rennie
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Date: 17 August 2022

Dear Sir or Madam

HAMPSHIRE WATER TRANSFER AND WATER RECYCLING PROJECT - CONSULTATION RESPONSE

I am writing on behalf of Havant Borough Council in my capacity as Leader in response to the consultation on the 'Hampshire Water Transfer and Water Recycling Project'.

Our feedback substantively relates to the consultation and how it has been run which are towards the end of this letter. Nevertheless, responses to the various posed questions by the feedback form are set out under the relevant headings are also set out below.

Question 1: Do you support water transfer and water recycling as the proposed solution to the challenge of securing water supplies for the future in Hampshire?

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 serious concerns relating to the use of recycled treatment wastewater as a new water source to top-up the Havant Thicket Reservoir and we are opposed to any such use.

It is understood that whilst this technology is used widely overseas, this would be the first project 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. This necessitates additional engagement and scrutiny beyond what has taken place so far.

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 m³/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. That's why, I was proud to support plans to once again put Havant Spring Water back on the map, with the approval of Havant Thicket, 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/outlet 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.

Question 2: What do you think about the options appraisal process we went through to select water transfer and water recycling as the proposed solution?

The process of using recycled water has potentially high environmental impact and we remain unconvinced that this is the best way to tackle the water supply deficit in Hampshire.

An estimated 21 per cent of the future water supplies are due to come from new or enlarged reservoirs and nine per cent from recycled water across the South East. Better demand management and increased capacity at other reservoirs would ensure that there is no need to use recycled water.

Question 3: What do you think about the process we went through to arrive at the proposed site for the new water recycling plant?

It is understood that 17 sites were assessed for the new water recycling plant. However, concern is expressed that these were the same as those considered for the desalination project and that this list was not revisited following the 2021 consultation. Whilst the relevant assessment criteria are identified, no site assessment information appears to have been published alongside the consultation. As such, there is a lack of transparency regarding the site assessment process.

The Consultation Brochure suggests nine sites were assessed, whereas page 21 of the Scheme Development Summary suggests 7 sites were assessed and 5 shortlisted. Clarification is sought with regard to the inconsistency of the two documents. It is critical that the most sustainable site is selected for the plant and the site selection assessment is clear and transparent.

Questions 4 & 12: Do you support our proposal to build a water recycling plant on Site 72 south of Havant? Do you support our proposal to build a high lift pumping station in the proposed location?

Site 72, more commonly known as Brockhampton West, is allocated for employment purposes in the Council's Local Plan, and has considerable potential offering a premium location for economic use, supporting a high number of local jobs.

Having been sold for development by the Council in January 2021, planning permission has been granted for the development of new employment units to provide up to 29,000 sq. m of floorspace for light industrial, manufacturing (B2) and warehousing (B8) uses.

On the assumption the site is brought into use for B8 purposes, this would create 335 FTE jobs, whereas if the buildings were in use for B2 operations then some 652 FTE jobs would be created. The number of jobs that the water recycling plant would support is not known.

As such, there is concern about the impact on the loss of any potential economic use. Notwithstanding the lack of transparency regarding the site selection process, the Council would be very pleased to assist in finding such an alternative location for the proposed recycling plant.

On this basis, the Council would welcome further information about the type and level of employment that would be supported by the water recycling plant. Furthermore, the Council would welcome any proposals to combine such a use alongside employment development.

Question 14: Feedback on the consultation

Whilst the consultation has been online, we feel that it has not received the type of attention or coverage that would be expected of a major change to how drinking water is stored and produced for residents of the Borough.

We would ask that the consultation is extended, and more promotion take place so that residents have a better understanding of the proposal. This could have included promotion within local social media groups across the region, publications in the local press and leaflet drops to households in the areas affected.

Only six drop in sessions have taken place supporting this consultation, only two of which have been in Havant Borough. Havant Borough Council has undertaken a similar number of drop in sessions supporting its local plan in the past, which affected a far smaller area than this proposal. Whilst 337 residents attended the Meridian Centre event and 83 attended the Leigh Park session, this represents a very small proportion of some 124,200 residents living in Havant Borough.

In terms of the material, the consultation documents are too complicated for the vast majority of our residents to understand and would not know enough to challenge or ask questions about the proposals. In particular, the survey booklet appears to be difficult to complete and heavily relies on the respondent having understood the consultation documents.

Overall, the proposals have been known about for some time, but the message has not reached our residents. This consultation has not been engaged with and has not therefore fulfilled its purpose in terms of educating and engaging the Borough's residents in relation to the proposals.

This is extremely regrettable and the Council urges Southern Water to undertake further informal consultation prior to the submission of its DCO in Spring 2023.

Engagement with our residents also needs to be on an ongoing basis between this non-statutory stage and the formal statutory consultation in Spring 2023 to ensure that residents are engaged as far as possible. As has been highlighted above, and indeed as part of the consultation, this 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. I fully expect a further package of engagement to be rolled out, focussing on raising awareness of the project and what it entails.

Conclusion

Havant Borough Council has serious concerns about Southern Water's Water Transfer and Water Recycling Project. Further information is needed in order to understand why water recycling is needed for the Havant Thicket Reservoir, as opposed to natural sources for filling the reservoir, and that the proposal is reconsidered. We also have concerns about the transparency of the process in the selection of the preferred water recycling plant site, and its displacement of a significant source of employment in Havant Borough.

Nevertheless, we remain supportive of the Reservoir project upon the proposals set out in the Planning Application for surplus water to be drawn from the Bedhampton Springs only.

My Officers also look forward to continuing their engagement in the various technical working groups to ensure that the potential impacts of the Project such as visual amenity, heritage and ecology are properly considered in drawing up the application for the Development Consent Order.

Residents of Havant for 1,100 years solely relied upon our natural Spring Water for our prosperity, it has the potential to sustain us for many more years to come, without the need we believe for the type of proposals set out in the consultation.

Yours faithfully

Councillor Alex Rennie
Leader of the Council