

**From:** [REDACTED]  
**To:** [Hampshire Water Project](#)  
**Cc:** [REDACTED]  
**Subject:** Hampshire Water Transfer and Recycling Project  
**Date:** 09 June 2026 09:36:57  
**Attachments:** [REDACTED]

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[REDACTED]

Dear Sir,

Rowlands Castle Parish Council wishes to make the strongest possible submission that the consultation by Southern Water concerning the above project with appropriate authorities and the general public **has not met the required standard** by a large margin and they have not complied with the legislative requirements under the Planning Act 2008, Sections 42, 47 and 48.

To that end, please find attached the following documents:

The Adequacy of Consultation Proforma (AoCR).

20260609 - RCPC letter to the Planning Inspectorate re the inadequacy of the consultation.

20260500 - Inadequacy of Consultation Report for RCPC, produced by our technical advisor

2021 Southern Water consultation-feedback-report

The last 2 are documents referenced within the letter setting out our concerns.

We ask that you give this thorough consideration because we are deeply concerned that Southern Water has made every effort to push this project through regardless of due process and the need to thoroughly engage and consult with all relevant authorities and the public at every stage and to take proper consideration of their views.

Thank you in anticipation.

Yours

[REDACTED]  
Chairman  
Rowlands Castle Parish Council



## Adequacy of Consultation Representation Proforma

Under *Section 55(4)(b) of the Planning Act 2008 (PA2008)* the Planning Inspectorate, on behalf of the Secretary of State, must take any adequacy of consultation representation (AoCR) received from a local authority consultee into account when deciding whether to accept an application for development consent, and this will be published should the application be accepted for examination.

An AoCR is defined in s55(5) in PA2008 as “a representation about whether the applicant complied, in relation to that proposed application, with the applicant’s duties under sections 42, 47 and 48”.

<b>Project name</b>	Hampshire Water Transfer and Water Recycling Project
<b>Date of request</b>	29 May 2026
<b>Deadline for AOCR</b>	12 June 2026
<b>Return to</b>	<a href="mailto:HampshireWaterProject@planninginspectorate.gov.uk">HampshireWaterProject@planninginspectorate.gov.uk</a>

Please complete the proforma outlining your AoCR on the above NSIP.

<b>Local Authority</b>	Rowlands Castle Parish Council
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In the opinion of the local authority, has the applicant complied with the legislative requirements listed below?

*Please note that this is specifically about the statutory consultation(s) undertaken.*

<b>Assessment of Compliance - Required</b>	
<b>S42 Duty to consult</b>	No
<b>S47 Duty to consult local community</b>	No
<b>S48 Duty to publicise</b>	No

If you would like to give more detail on any of the above, please do so below.

*Please keep it as succinct as possible and refer to facts and evidence related to consultation, rather than the merits of the application.*



<b>Additional comments - <i>Not compulsory</i></b>	
<b>S42 Duty to consult</b>	Not complied, please refer to detail in RCPC letter dated 9 June 2026.
<b>S47 Duty to consult local community</b>	Not complied, please refer to detail in RCPC letter dated 9 June 2026.
<b>S48 Duty to publicise</b>	Not complied, please refer to detail in RCPC letter dated 9 June 2026.
<b>Any other comments</b>	Failure to comply with the Gunning Principles, please refer to RCPC letter dated 9 June 2026 for further details.

# Water for Life - Hampshire Consultation Feedback Report

September 2021  
Final Version



from  
**Southern  
Water** 

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## Glossary

1-in-200-year	A severe drought – the return period of a significant drought and is the design drought year in WRMP19.
1-in-500-year	An extreme drought.
AONB	Area of Outstanding Natural Beauty - an area of countryside in England, Wales or Northern Ireland which has been designated for conservation under the Countryside and Rights of Way Act 2000 to protect, conserve and enhance its natural beauty.
Base Case	The preferred strategy in WRMP19 and the focus of the non-statutory public consultation. The Base Case was described as Option A.1 (75MI/d desalinated water from Fawley to Testwood Water Supply Works) in the Consultation Brochure.
Catchment	The area of region where all water flows to a single point, e.g. for a wastewater catchment, all wastewater.
Configuration	The structure of each Option (e.g. technology choice, route to deliver water).
COVID-19	Coronavirus Disease
Groundwater	Water held underground in the soil or in voids in rock.
MI/d	Megalitres (million litres) per day
Ofwat	Water Services Regulation Authority - the economic regulator of the water sector in England and Wales.
Preferred Strategy	Final strategy for the Western Area as described in WRMP19 (formerly referred to as Strategy A in draft WRMP19) and is what is required to be delivered by the Section 20 agreement.
Prescribed / Statutory Consultees	Consultees as prescribed by the Planning Act 2008 and secondary legislation
Programme	All activities included within the scope of WfLH.
Project	Specific activities required to deliver one of the options / solutions / schemes.
RAPID	Regulatory Alliance for Progressing Infrastructure Development - formed to help accelerate the development of new water infrastructure and design future regulatory frameworks. Made up of the three water regulators: Ofwat, Environment Agency and Drinking Water Inspectorate. It was established with the intention of providing a seamless regulatory interface, working with the industry to promote the development of national water resources infrastructure that is in the best interests of water users and the environment.
Routes	A number of alternative routes have been identified for the pipeline component for the sub-option and configurations.
Section 20 agreement	A legal agreement under Section 20 of the Water Industry Act which commits Southern Water to pursue the preferred permanent water resources solution/s with "all best endeavours"
WRMP	Statutory plan which sets out how water companies will supply healthy, reliable drinking water to homes and businesses for at least the next 25 years.
WRMP19	The statutory plan published in 2019 which sets out how Southern Water will supply healthy, reliable drinking water to homes and businesses.

# 1. Introduction

## 1.1. Purpose and structure of report

This document comprises Southern Water's Consultation Feedback Report on the non-statutory public consultation undertaken from 08 February to 16 April 2021 on the strategic water resource project under the Water for Life - Hampshire programme.

The purpose of this document is to provide an account of the public consultation undertaken and an overview of consultation feedback received and to highlight key issues emerging from the consultation responses.

The scope of this document does not include how Southern Water has considered and had regard to the consultation feedback. This will be included at the next appropriate stage in the consenting process.

The Consultation Feedback Report is structured as follows:

- Section 2 Approach to non-statutory public consultation provides an overview of the purpose and scope of consultation, and the approach taken to consultation and analysis of consultation responses.
- Section 3 Analysis of consultation responses provides an overview of individual responses to the feedback form questions, responses received by direct communication and emerging key issues.
- Section 4 Summary and next steps provides a summary of the report and sets out the next steps that will be undertaken in relation to consultation and engagement on the Water for Life: Hampshire programme.

## 1.2. Introduction to Water for Life – Hampshire

Through the Water for Life - Hampshire programme, Southern Water aims to provide sustainable solutions to water shortages that both protect Hampshire's river habitats and provide for the county's growing population in the future.

Southern Water is required to meet their statutory duties as a water undertaker to prepare and maintain a Water Resources Management Plan (WRMP) under section 37A of the Water Industry Act 1991<sup>1</sup>. A WRMP should set out how each water undertaker will manage and develop water resources to meet their supply obligation for at least the next 25 years. Southern Water is required to publish a WRMP every five years to ensure it continues to be relevant and specific to current challenges and opportunities.

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<sup>1</sup> section 37A of the Water Industry Act 1991 <https://www.legislation.gov.uk/ukpga/1991/56/section/37>

Southern Water produced a WRMP in 2019 (WRMP19)<sup>2</sup> which states the need to provide approximately 190 million litres of water over the next 10 years in Hampshire to meet future demand. The WRMP19 outlines proposed long-term solutions to protect the unique chalk rivers in Hampshire, the River Test and Itchen and make up future water shortfalls.

In the WRMP19, Southern Water sets out plans for a desalination plant on the Solent which Southern Water is required to use “all best endeavours” to deliver. This desalination plant is known as the ‘Base Case’ and is the focus of the non-statutory public consultation. The Base Case involves the construction of a circa 75Ml/d (million litres per day) desalination plant at Fawley with direct input into the water network via a pipeline to Testwood Water Supply Works.

Whilst Southern Water has a legal obligation to use all best endeavours to deliver the Base Case, it is also required to investigate alternative options in the event that the Base Case cannot be delivered. A description of the alternative options that were introduced at the non-statutory public consultation is provided in Table 1.

**Table 1 Alternative options introduced in the non-statutory public consultation**

Category	Alternative Solutions <sup>3</sup>
Desalination alternatives	<ul style="list-style-type: none"> <li>• <b>Configuration A.2:</b> 61 Ml/d at Ashlett Creek, near Fawley</li> <li>• <b>Configuration D.1:</b> 40 Ml/d Desalination to industrial user, 30 Ml/d Transfer from South West Water, 41 Ml/d Recycling</li> </ul>
Water recycling	<ul style="list-style-type: none"> <li>• <b>Configuration B.2:</b> 61 Ml/d recycled water from Budds Farm Wastewater Treatment Works to the <b>Upper Itchen / Havant Thicket Reservoir</b></li> <li>• <b>Configuration B.3:</b> 61 Ml/d recycled water from Budds Farm Wastewater Treatment Works to Otterbourne Water Supply Works</li> <li>• <b>Configuration B.4:</b> Up to 61 Ml/d recycled water from Budds Farm Wastewater Treatment Works to Otterbourne Water Supply Works <b>via Havant Thicket Reservoir</b></li> <li>• <b>Configuration B.5:</b> 75 Ml/d recycled water from combination of Budds Farm Wastewater Treatment Works and Peel Common Wastewater Treatment Works</li> <li>• <b>Configuration B.1:</b> 61 Ml/d recycled water from Budds Farm Wastewater Treatment Works <b>to the Lower Itchen [no longer under consideration]</b></li> </ul>
Water transfer	<ul style="list-style-type: none"> <li>• <b>Configuration D.2:</b> 75 Ml/d direct raw water transfer from Havant Thicket Reservoir to Otterbourne</li> </ul>

<sup>2</sup> WRMP19 [https://www.southernwater.co.uk/media/3656/5025\\_wrmp\\_v11.pdf](https://www.southernwater.co.uk/media/3656/5025_wrmp_v11.pdf)

<sup>3</sup> Further detail about the alternative solutions can be found in the scheme consultation brochure <https://www.southernwater.co.uk/our-story/water-for-life-hampshire/our-consultation-water-for-life-hampshire>

## 2. Approach to Non-Statutory Public Consultation

### 2.1. Purpose and scope of consultation

The purpose of the non-statutory public consultation was to consult on the Base Case as presented in the WRMP19, which Southern Water has an obligation to use its all best endeavours to deliver. Some information on the alternative options was provided as part of the consultation to provide wider context and to seek views on the alternative options, should the Base Case prove to be undeliverable, however the scope of consultation was to consult on the Base Case and it was not an options appraisal consultation where consultees were asked to select a preferred option.

### 2.2. Approach to consultation

#### 2.2.1. Introduction

Southern Water recognises the importance of consulting early in the development of a scheme. For this reason, it chose to consult at a stage earlier than the statutory requirements, using best practice as a guide.

#### 2.2.2. Developing our approach to consultation

The overarching aims of consultation for the Water for Life – Hampshire programme framed Southern Water's approach to the non-statutory public consultation. The aims are to:

1. Inform impacted and interested stakeholders and customers about the development of the Water for Life – Hampshire programme.
2. Gather feedback from stakeholders and the community on elements of the Base Case to help inform the development and design of our proposals.
3. Gather feedback from stakeholders and the community on alternative solutions, should the Base Case not be deliverable.
4. Identify key issues and concerns about the impacts and effects of our proposals and identify potential ways to help mitigate them.

Allied to this, was Southern Water's intention to take a digital-first (online) approach and use the latest technology to bring the scheme to life for customers and stakeholders, whilst still making use of traditional methods where safe, appropriate and practical to do so in accordance with latest government guidance on social distancing in light of Covid-19.

Due to the lockdown restrictions at the time, a digital-first (online) approach was taken to consultation.

A 360-degree virtual image of a consultation room was provided which enabled users to browse information boards, watch films and leave feedback. A copy of the consultation documents was available on request to those who were unable to access the information online.

#### 2.2.3. When we consulted

The non-statutory public consultation took place between 8th February and 16th April 2021. This included an extension from the originally planned 42 days. The extension to consultation was provided in response to some residents located in the Fawley area contacting Southern Water to note that they had not been contacted directly or had not seen the consultation promotion. Letters were distributed to residents in the Fawley area and the extension to consultation provided to ensure sufficient time to engage.

Due to the virtual nature of the consultation, Southern Water issued notification by email on the 8th February to statutory consultees and potential interest groups.

The extension to consultation resulted in consultation coinciding with ‘purdah’<sup>4</sup>. As Southern Water had already provided six weeks in advance of purdah commencing for public bodies and local authorities to respond, the extension was not considered to impact upon or to have been influenced by purdah.

## 2.2.4. What we consulted on

As noted in Section 2.1, the focus of consultation was on the Base Case as presented in the WRMP19. A description of the Base Case was provided along with a high-level overview of the potential environmental impacts.

As Southern Water is also required to explore alternative options should the Base Case prove to be undeliverable, an introductory description of the alternative options was provided and initial views were sought on whether the alternatives would be acceptable to address potential future water resource challenges in Hampshire, should the Base Case not be deliverable.

Table 2 provides detail about the consultation documents that formed the basis of the non-statutory public consultation. The consultation documents were available online through the virtual platform<sup>5</sup> and available in other formats by request.

**Table 2: non-statutory public consultation documents**

Document	Detail
Consultation Brochure (included in Appendix A)	<p>The Consultation Brochure was the primary consultation document. The audience for the document was broad, encompassing all those people and organisations who have taken an interest and want to respond to the consultation.</p> <p>The Consultation Brochure contains:</p> <ul style="list-style-type: none"> <li>• The background of the Water for Life - Hampshire programme;</li> <li>• A summary of the proposed desalination plant (Base Case) as the preferred option and alternative options;</li> </ul>

<sup>4</sup> Purdah is the pre-election period (which ran from the 25<sup>th</sup> March 2021 to 6<sup>th</sup> May 2021) during which time local members will generally refrain from making public announcements.

<sup>5</sup> <https://www.southernwater.co.uk/our-story/water-for-life-hampshire/our-consultation-water-for-life-hampshire>

	<ul style="list-style-type: none"> <li>• Information about potential benefits, effects and impacts of the desalination plant and alternative options; and</li> <li>• How Southern Water may propose to mitigate any potential impacts.</li> </ul> <p>The Consultation Brochure signposted readers to a more detailed information report and how to provide feedback.</p>
<p>Feedback Form (included in Appendix B)</p>	<p>The Feedback Form aimed to collect people’s views during the consultation process. The questions sought feedback on the issues that are relevant to this stage of Southern Water’s programme development. It also provided space for consultees to make any additional comments. The feedback questionnaire was available as a printed version and an online version was available on the scheme website. It provided details of the Freepost address for the scheme.</p>

### 2.2.5. Who we consulted with

A stakeholder mapping exercise was undertaken to identify statutory and non-statutory stakeholder groups relevant to the Water for Life - Hampshire programme – for the base case and the alternative solutions. A list of the stakeholders identified can be found in Appendix C.

Emails were sent to statutory and non-statutory stakeholder groups identified, to raise awareness of the consultation and the consultation materials, and to invite comments on the proposals.

The registered owners of the land for the Base Case site and the associated pipeline route options were identified and letters were sent either by first-class post or e-mail. Notices were also placed on site where the land was not registered and the owners could not be identified.

Notification letters were distributed to local residents in the Fawley area once consultation had started, following a request for direct communication by residents local to Fawley. Additional time for responding was provided through an extension to the consultation period.

The notification letters included the following information:

- The purpose of the non-statutory public consultation;
- The timescales of the non-statutory public consultation and the deadline for responding;
- A link to the virtual exhibition where consultation documents and the feedback form could be viewed; and,
- Provided the opportunity to request hard copies of the consultation documents and feedback form.

### 2.2.6. 2.2.6 Making information available

The consultation was promoted through various awareness raising exercises to reach interested parties that were not contacted directly, including customers within the Western Area and staff and contractors of Southern Water. The awareness raising activities that were undertaken are outlined in Table 3.

**Table 3 Making information available activities**

Activity	Detail
Water for Life – Hampshire Programme’s website	All consultation documents were published on Southern Water’s website: <a href="http://www.southernwater.co.uk/water-for-life-hampshire">www.southernwater.co.uk/water-for-life-hampshire</a>
Deposit locations	Due to Covid-19 restrictions in place during the time of the consultation period and to ensure the safety of the public it was decided not to provide in person deposit locations for viewing documents.  However, online deposit locations were prepared with local authorities, so they were available if required.
Requests for documents	On request, Southern Water made available one copy of each of the consultation documents (consultation booklet and feedback questionnaire), free of charge, to those unable to access them via the internet, either on DVD or hard copy. Large print files of consultation documents were also available on request.  To request a printed copy of the feedback form and consultation brochure, the public were able to write to:  WATER FOR LIFE – HAMPSHIRE,  PO BOX 5215
Public events	Face to face public events were not held due to social distancing guidance and legislation at the time of the consultation.
Virtual exhibition	This tool allowed users to virtually move around a 360-degree image of an information event and interact with materials, including banners, videos and technical documents, as if they were attending an exhibition.  <a href="https://www.southernwater.co.uk/our-story/water-for-life-hampshire/our-consultation-water-for-life-hampshire">https://www.southernwater.co.uk/our-story/water-for-life-hampshire/our-consultation-water-for-life-hampshire</a>

Throughout the consultation period, people were also able to contact Southern Water by emailing [customerinsight@southernwater.co.uk](mailto:customerinsight@southernwater.co.uk) or via the dedicated mailbox [WFLH@southernwater.co.uk](mailto:WFLH@southernwater.co.uk).

### 2.2.7. Raising awareness

During the consultation period, Southern Water used a range of communication channels to promote the consultation, provide details of where consultees were able to access information and the details of the



virtual public exhibition. Communications surrounding the scheme directed residents and stakeholders to the scheme’s website to find out further information on the proposals. Table 4 outlines the awareness raising activity used during the non-statutory public consultation.

**Table 4 Awareness raising activities**

Activity	Detail
Hard to reach group engagement	<p>Southern Water asked Local Authorities to provide details of hard to reach groups in their areas so these could be reviewed against the company's existing records and any additional groups added.</p> <p>Southern Water contacted hard to reach groups to advise them of the consultation and gain insight into the best way to raise awareness and consult with their members.</p> <p>Southern Water will also explore more traditional methods of engagement and consultation as part of future rounds of consultation on the Programme (e.g. face-to-face meetings and events), when COVID19 restrictions allow this type of engagement to resume.</p>
Stakeholder communications	<p>Southern Water sent notification emails and letters to statutory and non-statutory stakeholders relevant to the whole Programme. Additionally, landowners and residents <b>in the Fawley area were issued with letters.</b> Those who had previously expressed an interest in the scheme and provided us with contact information were also contacted.</p>
Press / media activities	<p><b>A press release was sent out on 8<sup>th</sup> February 2021 to local publications, radio broadcast and trade press.</b> A copy of the press release is included at Appendix D.</p> <p>Advertorials were placed in local newspapers.</p>
Scheme website	<p>Southern Water updated the scheme’s website with details of the consultation and to direct people to the virtual exhibition to have their say on the proposals.</p>

Social Media	<p>Southern Water shared communications across Southern Water’s Facebook<sup>6</sup>, Twitter<sup>7</sup> and LinkedIn<sup>8</sup> pages throughout the consultation period to raise awareness.</p> <p>In Southern Water’s initial engagement with each of the county’s local authorities, support was requested to help to improve the reach of digital communications. As a result, the consultation links were shared via numerous newsletters, mailing lists and social media channels, including the local authorities’ social media channels.</p> <p>A similar request was also made to other organisations and individual stakeholders to share via their networks.</p> <p>A total of 14 posts were published, including a Facebook advertisement.</p>
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## 2.3. Approach to analysing consultation responses

Consultation responses were received from statutory bodies, non-statutory bodies and members of the public. Responses were received through both the feedback form and through direct communication via email correspondence.

A consultation response database was developed to log all responses to the consultation. The database was developed to enable categorisation of responses, identification of recurring issues, and to track and log consultation responses and feedback to consultation responses.

An initial high-level review of consultation responses was undertaken to determine ‘topics’ and ‘issues’ for categorising responses. Topics were identified based on the structure of the consultation feedback form, and the elements of each consultation response were assigned to a topic.

Once topics had been identified, the elements of each consultation response were assigned an ‘issue’. The issues were primarily based on themes previously identified by Southern Water, and where additional issues were recurring, these were included in addition. The topics and issues identified are outlined in Table 5.

**Table 5 Topics and Issues adopted for categorising**

Topics	Issues
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<sup>6</sup> [www.facebook.com/SouthernWater](http://www.facebook.com/SouthernWater)

<sup>7</sup> [www.twitter.com/SouthernWater](http://www.twitter.com/SouthernWater)

<sup>8</sup> [www.linkedin.com/company/southern-water/](http://www.linkedin.com/company/southern-water/)

- Base Case
- Desalination alternatives
- Water recycling alternatives
- Water transfer alternatives
- Other suggestions
- General comment on proposals
- Consultation
- Needs case

- Coastal change
- Flood Risk
- Water quality and resources
- Environmental
- Air Quality
- Dust, odour, artificial light, smoke and steam and noise
- Biodiversity and nature conservation
- Landscape and visual impacts and seascape
- Historic environment
- Carbon emissions and energy
- Traffic and transport
- Climate change adaptation
- Health
- Socio-economic
- Recreation
- Cumulative impacts
- Engineering design
- Location / Land
- Consenting regime
- Cost
- Other

## 3. Analysis of consultation responses

### 3.1. Overview

A total of 180 consultation responses were received during the consultation period (including the extension). Some consultation responses were received after the consultation had closed. These have also been considered in this document.

Responses to the non-statutory public consultation were provided in various formats. Table 6 provides an overview of the number of responses received in each format.

**Table 6 Format of responses received**

Response format	Number of responses received
Feedback form (online)	143
Direct communication (including emails and letters)	37
<b>Total</b>	<b>180</b>

Table 7 provides a breakdown of the consultation responses received from statutory and non-statutory stakeholder groups.

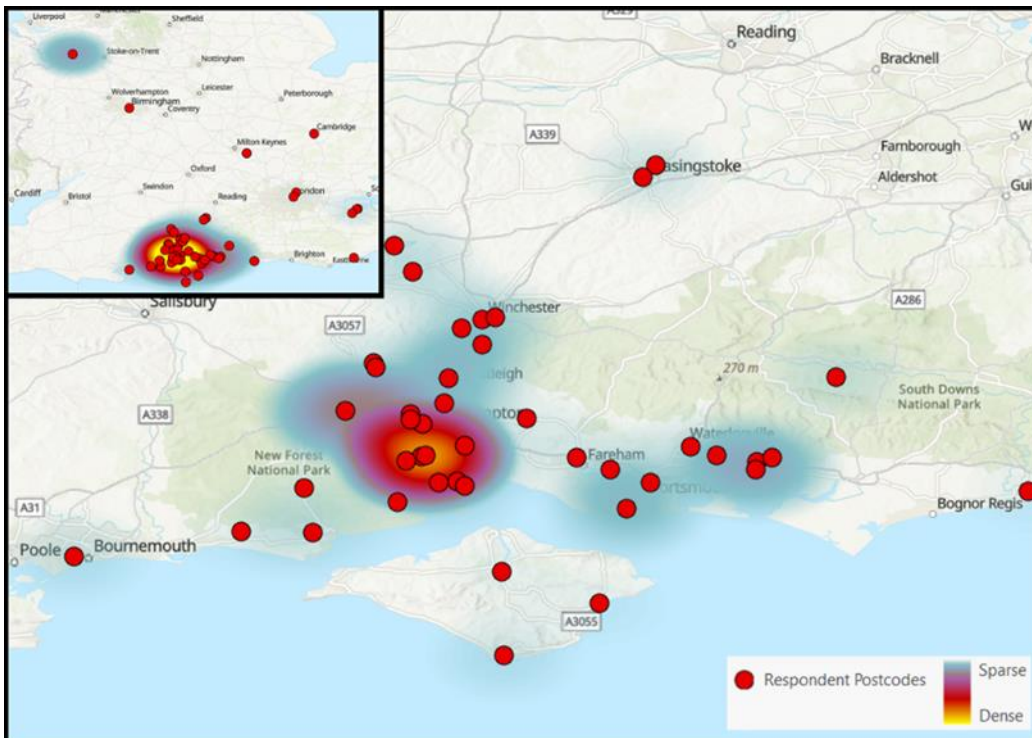
**Table 7 Stakeholder groups that provided a consultation response**

Statutory consultee groups	Non-statutory consultee groups
<b>Prescribed and Statutory Consultees</b>	Ashlett Sailing Club
Environment Agency	Blue Marine Foundation
Natural England	CPRE Hampshire
Historic England	Friends of the Ems
Associated British Ports	Friends of the New Forest
Landowners	Hampshire and Isle of Wight Wildlife Trust
Local residents in Fawley	Hampshire Chamber of Commerce
<b>Local authorities within WfLH Area</b>	Julian Lewis MP and Councillor Alexis McEvoy
Hampshire County Council	
New Forest National Park Authority	New Forest Association

Isle of Wight Council	New Forest East Constituency Labour Party
Test Valley Borough Council	Partnership for South Hampshire
Winchester City Council	Royal Society for the Protection of Birds
Gosport Borough Council	Salmon and Trout Conservation
Havant Borough Council	Solent Protection Society
South Downs National Park Authority	The British Horse Society
<b>Parish Councils</b>	Customers of Southern Water
Fawley Parish Council	Local businesses

Of the individual respondents who used the online feedback form to provide a consultation response and who provided details of their postcode, just over 50% were based in and around the Fawley area (i.e. the area surrounding the proposed location for the desalination plant and pipelines associated with the Base Case). A smaller proportion (25%) of respondents were located in the areas surrounding the water recycling and water transfer schemes north of Portsmouth, whilst a few respondents were located further afield in the southern region, with a couple of respondents located in the midlands and the north of England.

Figure 1 provides an overview of the geographical distribution of respondents to the online feedback form.



**Figure 1 Geographical distribution of respondents to the online feedback form**

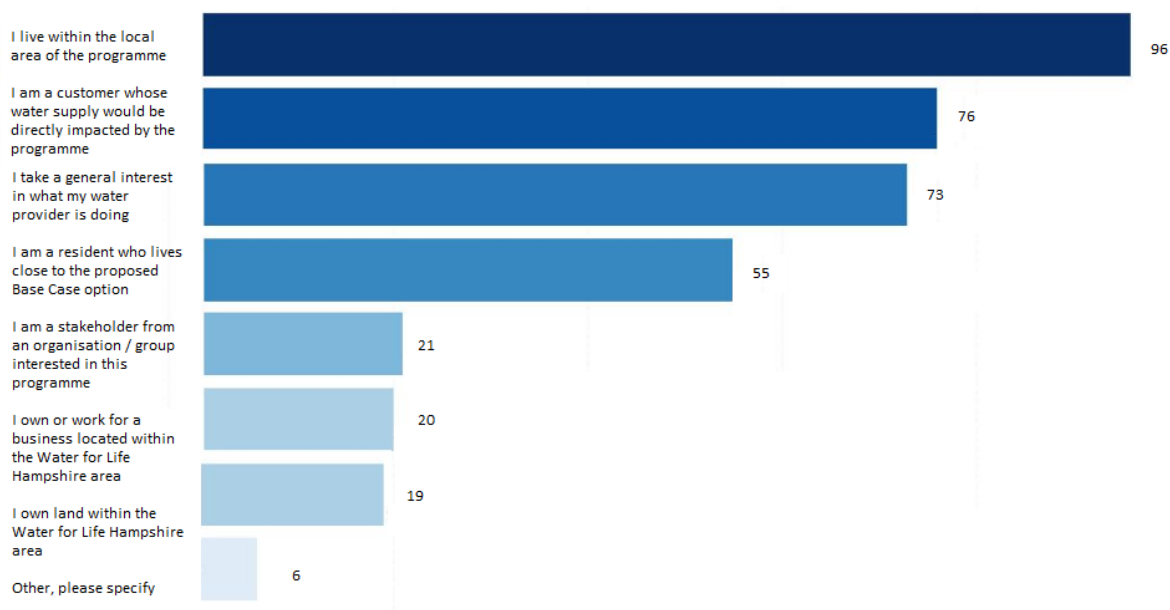
### 3.2. Consultation responses - feedback form

A total of 143 responses were received via the online feedback form. This section provides a high-level summary of the responses received to each question on the form. Further detail on the key concerns arising through consultation are provided in Section 3.6 ‘Key Issues’.

Question 1. Which of the following best describe your interest in the Water for Life - Hampshire programme?

This question enabled respondents to provide multiple responses to describe their interest in the programme. Figure 2 provides a breakdown of the number of responses received against each category. Over 50% of respondents were customers of Southern Water, and a similar proportion of respondents noted that they took a general interest in what their water provider is doing.

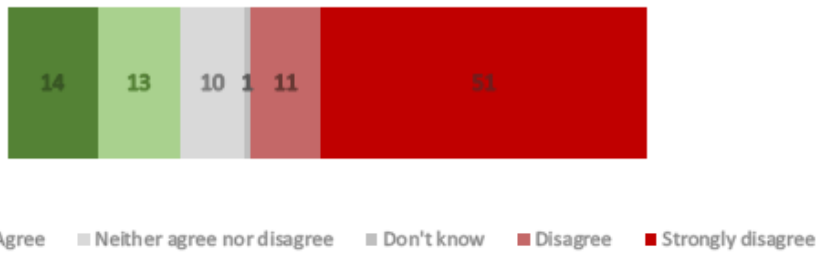
A total of 67% of respondents stated that they lived within the local area of the programme, whilst 38% stated that they lived close to the proposed Base Case option. A similar proportion of respondents (13%) stated that they owned land within the area, owned or worked for a business within the area or were from an interested stakeholder group. A few respondents were responding on behalf of a stakeholder organisation, a local business within the area or owned land within the area.



**Figure 2 Respondents’ interest in the Water for Life Hampshire programme**

Question 2a. To what extent do you agree that the proposed Base Case would be an acceptable solution to the potential future water resource challenges in Hampshire?

The majority of respondents (51%) strongly disagreed that the Base Case would be an acceptable solution to the potential future resource challenges in Hampshire. Of these, 58% were located in the immediate Fawley area and 74% were in the immediate Fawley area or the surrounding New Forest area. Over 25% of respondents strongly agreed or agreed that the Base Case would be an acceptable solution. Of these respondents, only 10% were located in the immediate Fawley area and 64% of these respondents were located in the Portsmouth area and further afield.



**Figure 3 Respondent's view on proposed Base Case**

Q2b. Please provide any comments in relation to the following areas to support your answer to question 2 - Options for abstracting water from the Solent; Information on the desalination plant infrastructure and the ways we are considering managing the cleaned wastewater (brine) removed from the seawater; The alignment of the underground pipeline, to connect drinking water produced by the project, to our network.

The key issues raised in response to this question were environment, marine, carbon emissions and energy, biodiversity and nature, and location. Comments relating to the environment were generally with regards to the location of the desalination plant in the National Park and proximity to environmental designations. Respondents were concerned about how the desalination plant and the pipelines would impact on the environment and additional information was requested to better understand this. The most reoccurring concern related to the impact of the brine on the marine environment.

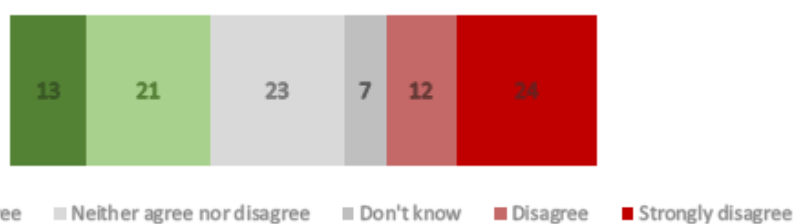
Respondents noted that the desalination plant would require a high energy input and this would result in carbon emissions; questions were raised about whether this would be aligned to national and regional targets.

Q3. Do you have any comments to make in relation to potential impacts of the proposed Base Case? These could cover the following areas: water, environmental, energy, traffic and transport and people (health and socio-economic). (Please provide as much detail as you can)

Respondents tended to answer similarly to question 3 as to question 2b, with key issues raised relating to the environment, carbon emissions and energy and the marine environment. The impacts of both construction and operation on traffic and transport was also a key concern raised by some respondents.

Q4a. To what extent do you feel the desalination alternatives would be an acceptable alternative solution, should the Base Case not be delivered, to address potential future water resource challenges in Hampshire?

The proportion of respondents who agreed that the desalination alternatives (which are located in the same location as the Base Case) would be an acceptable alternative solution was similar to the proportion of respondents who disagreed. Almost 25% of respondents neither agreed or disagreed, indicating a range of views exist with regards to the acceptability of a solution.



**Figure 4 Respondent's view on desalination alternatives**

Q4b. Please provide any comments to support your answer to Q4a.

Responses to Q4b tended to reflect responses on the Base Case, although it was recognised by some respondents that a smaller desalination plant would be less impactful. The key issues raised in relation to Q4b were environment and water quality and resources. Comments relating to the environment tended to echo comments raised about the Base Case, however concerns were also raised by some respondents about the impact of the desalination alternatives on water bodies where abstraction and discharge would take place.

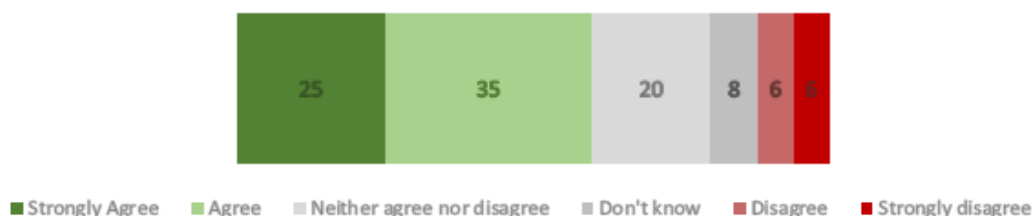
Q5. Do you have any comments to make in relation to potential impacts of any of the desalination alternatives listed?

The key issues raised in response to Q5 related to the environment and carbon emissions and energy. Similarly to responses to Q4b, comments tended to echo those raised about the Base Case with only a few specific comments about the desalination alternatives.

Q6a. To what extent do you feel the water recycling alternatives would be an acceptable alternative solution should the Base Case not be delivered, to address potential future water resource challenges in Hampshire?

A significant proportion of respondents agreed that water recycling alternatives would be an acceptable alternative solution, with only 12% indicating disagreement, and 28% in total responding 'don't know' or 'neither agree nor disagree'.

A total of 49% of the respondents who agreed that water recycling alternatives would be an acceptable alternative solution are located in Fawley and the surrounding area to the Base Case location



**Figure 5 Respondent's view on water recycling alternatives**

Q6b. Please provide any comments to support your answer to question 6a

The key issues raised in response to Q6b related to the environment, including with regards to disruption to the environment and the local community. Generally, respondents were supportive of water recycling due to the perceived likelihood of lower environmental damage. However, it is important to note that the consultation materials did not include any assessment work to confirm that this is the case.

Q7. Do you have any comments to make in relation to potential impacts of any of the water recycling alternatives listed?

The key issues raised in response to Q7 related to the environment, including with regards to disruption to the environment and the local community. Generally, respondents were supportive of water recycling due to the perceived likelihood of lower environmental damage. However, it is important to note that the consultation materials did not include any assessment work to confirm that this is the case.

Q8a. To what extent do you feel the water transfer alternatives would be an acceptable alternative solution, should the Base Case not be delivered, to address potential future water resource challenges in Hampshire?

A large proportion of respondents agreed that water transfer alternatives would be an acceptable alternative solution, with a similar proportion responding 'don't know' or 'neither agree nor disagree'. Of those who agreed, 64% are located in Fawley and the surrounding area to the Base Case location.



**Figure 6 Respondent's view on water transfer alternatives**

Q8b. Please provide any comments to support your answer to question 8a

The key issues raised in response to Q8b related to the environment, including with regards to disruption to the environment, the local road network and the local community. Some respondents perceived that water transfer alternatives would have a lower environmental impact and presumed that they would be less costly than the Base Case however concerns were raised about whether they offered a long-term solution. However, it is important to note that the consultation materials did not include any assessment work to confirm that the water transfer alternatives have lower environmental impacts than the Base Case.

Q9. Do you have any comments to make in relation to potential impacts of the water transfer alternatives?

The key issues raised in response to Q9 related to the environment, including with regards to disruption to the environment, the local road network and the local community. Some respondents perceived that water transfer alternatives would have a lower environmental impact and be less costly than the Base Case. However, it is important to note that the consultation materials did not include any assessment work to confirm that this is the case. Concerns were raised about whether water transfer alternatives offer a long-term solution.

Q10. Do you have any other comments, thoughts or concerns about the Water for Life –

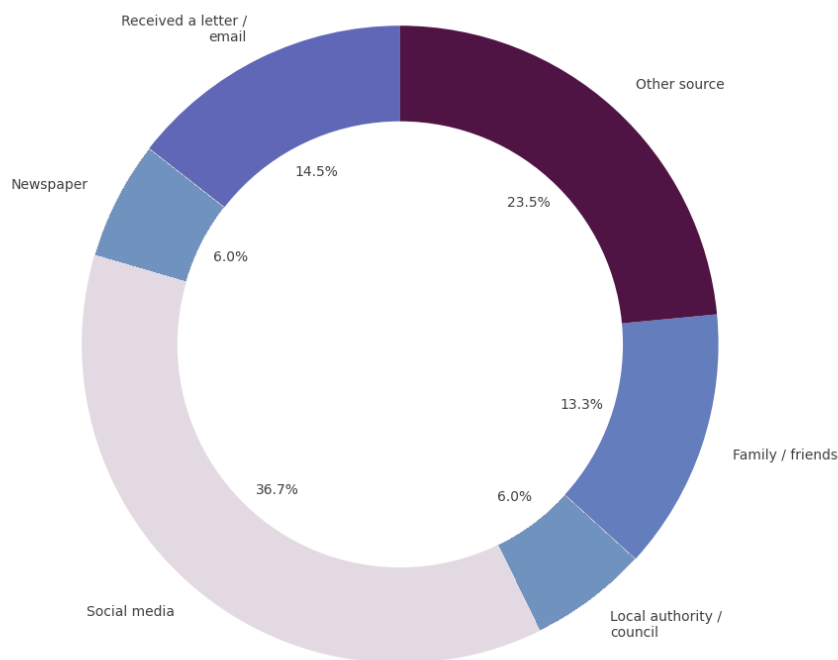
Hampshire programme of proposed options you have provided feedback on?

The responses to this question tended to echo and / or emphasise concerns raised through the previous questions. Some key recurring themes were:

- Request for more detailed information about the proposal, its location and environmental impacts
- Supportive of consultation and a programme to improve management of water resources
- More awareness needed of consultation and the programme

Q11a. How did you hear about this consultation?

The most common response to Q11a was that respondents heard about consultation through social media, followed by 'other source' and received a letter / email. Some respondents heard about the consultation through family / friends, the newspaper and the local authority. A summary is provided in Figure 7.



**Figure 7 How respondent's heard about consultation**

Q11b: Do you have any feedback on this consultation e.g. level of information provided, advertising etc?

A total of 30% of respondents who provided comments on the consultation noted that there had been insufficient promotion of the consultation or that they had not been directly informed about consultation and had found out about it through another source for example from residents on social media. Some respondents residing in the vicinity of the programme and Southern Water customers suggested that they should have received direct communication.

It was noted by 9% of respondents that the virtual engagement platform was difficult to navigate, although 5% noted that the platform provided a good use of technology in response to this question.

### 3.3. Consultation responses - direct communication

Each of the consultation responses was read in full and the comments raised are being considered by the Programme team. Key matters raised in support and in objection to the scheme have been identified and a summary is provided in the sub-sections below.

#### 3.3.1. Individual responses

Sixteen individual responses were provided by email from local residents and interested members of the public about the Base Case and alternative proposals. The majority of the individual responses received disagreed with the Base Case due to its location and raised concerns about the approach taken to consultation / engagement with local residents. The key issues raised in the individual responses related to:

- Alternative proposals to the Base Case
- Environmental impacts of construction
- Climate change and sustainability
- Engagement with local residents and landowners
- Level of detailed information available
- Approach to optioneering and evaluation of alternatives
- Impacts on local businesses
- Need case
- Cost

The level of engagement undertaken with residents on the Base Case to date and during the first few weeks of consultation was a key concern to those who provided a direct response. Concerns related to the quality and quantity of the consultation materials provided by Southern Water, and in particular the lack of technical detail about the location, size and scale of the Base Case proposals.

The environmental impacts of the Base Case were also a key concern in the individual responses. Concerns were raised about the environmental information and the assessments completed to date to inform the Base Case. It was requested that Southern Water undertake more assessment work to demonstrate that the proposed desalination plant is a sustainable water supply solution. The individual responses expressed concerns about the infrastructure associated with the Base Case being energy intensive and a high carbon emitting water supply solution to existing environmental and supply problems. The discharge of brine and the impact on existing and future habitats were key concerns raised about the natural environment.

Alternative proposals to the Base Case and questions about cost were other key issues raised in the individual responses. Concerns relating to cost focused on the investment required to deliver the project. Water recycling alternatives and alternative locations for a desalination plant are some of the alternative proposals recommended in the individual responses. Concerns were raised about the scheme selection process completed to date to identify the Base Case as Southern Water's preferred solution.

#### 3.3.2. Local Planning Authorities

Consultation responses were received from eight Local Planning Authorities. The eight Local Planning Authorities who submitted a consultation response were:

- Gosport Borough Council
- Hampshire County Council

- Havant Borough Council
- Isle of Wight Council
- New Forest National Park Authority
- South Downs National Park Authority
- Test Valley Borough Council
- Winchester City Council.

Consultation responses received from local planning authorities included both supportive comments and objections in principle to the Base Case. In general, the Local Planning Authorities requested that Southern Water work closely with them as the Water for Life - Hampshire programme progresses.

Concerns about the engagement completed to date with Local Planning Authorities about the Base Case were expressed. Several of the Local Planning Authorities stated that they are unable to provide substantial comments on the merits and impacts of the Base Case and alternative solutions due to the level of detail provided by Southern Water to date. Further detail was requested from the Local Planning Authorities to support their review of the Base Case and the alternative solutions.

Consultation responses acknowledged that Hampshire faces significant water supply challenges in the future. This included an acknowledgement that existing water and drainage infrastructure will be unable to meet future demand.

Some consultation responses stated a preference for the alternative solutions due to the likely negative environmental impacts created by the Base Case. This included concerns about the anticipated negative impact on biodiversity, climate change, landscape and water environments, along with the high energy usage required. Reference was made to the climate emergency and national and local targets for net zero. Alternative solutions included water recycling schemes and alternative locations for the desalination plant.

### 3.3.3. Parish Councils

One parish council response was received from Fawley Parish Council.

Fawley Parish Council objected to the Base Case in principle due to the location and the environmental sensitivities of the area. Concern was raised that not enough effort had been made to consider alternative locations. Concerns were also raised relating to the level of information available at this stage.

### 3.3.4. Other Statutory Consultees

Consultation responses were received from three regulatory bodies in relation to the Base Case:

- Environment Agency
- Historic England
- Natural England.

The Environment Agency provided comments on the method of consultation, the Base Case, the alternatives and wider programme. The visual display of documents in the virtual engagement room was welcomed however it was noted that slides on the alternative options would have been helpful to be presented in the virtual room.

Clarification was requested about whether the alternative options are being given equal status to the Base Case in the ongoing investigations. In relation to the Base Case, the Environment Agency emphasised concerns they had raised prior to non-statutory public consultation about the widely designated

environmentally sensitive area, and the management of brine discharge. The Environment Agency noted the need for additional information to be shared, in particular estuarine modelling data.

Natural England considered that there were **significant omissions in the consultation documentation** with regards to the scale and extent of potential impacts likely to arise from the Base Case **and alternative solutions**. Whether the Base Case (and alternatives) could meet the required environmental legal tests was also questioned, including those associated with the Habitat Regulations and the Wildlife and Countryside Act 1981 (as amended). **It was noted that the level of information, and in particular environmental information provided in the consultation brochure, did not enable an informed position to be provided**. Natural England also made reference to the potential carbon impacts of the Base Case.

The response from Historic England focused on the options for pipeline routing across the Base Case and alternative solutions, with a particular focus on the pipeline routing associated with the Base Case. Concerns relating to the pipeline routing for the Base Case centred around the presence of scheduled monuments in the area, and the archaeologically rich landscape of Beaulieu Heath. Historic England noted that the pipelines should be routed around the monument boundaries.

### 3.3.5. Non-Statutory Consultee Groups

Consultation responses were received from 14 non-statutory consultee groups. As each group tended to have a particular area of interest, the comments across these groups were broad. Key comments received included:

- A preference for alternative water supply solutions
- Concerns about the Base Case's impact on existing infrastructure
- Concerns about the Base Case and environmental impacts
- Disagreement with alternative solutions provided
- Does not consider the Base Case to be viable or necessary
- Further work is required to inform the Base Case delivery
- Objection to the Base Case in principle
- Supportive of the Base Case in principle.

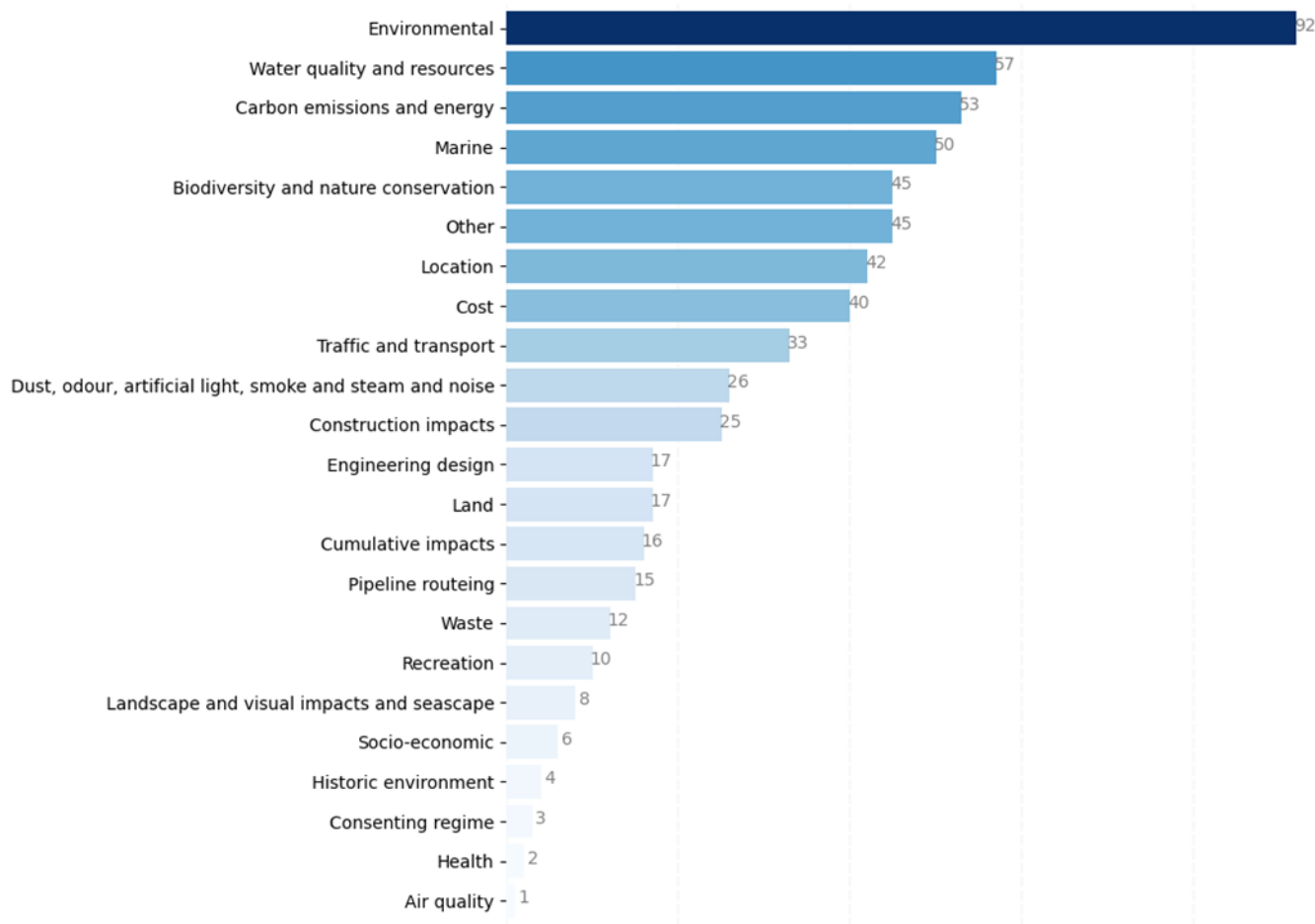
## 3.4. Key Issues

Through the consultation analysis, some key recurring issues have begun to emerge. The 'topics' and 'issues' identified in Section 2.3 of this report have been used to analyse the consultation responses. This section provides a summary of the key points raised against the 'topics' and 'issues' identified.

Across the consultation responses, the most recurring 'issue' was 'environmental' which includes where respondents have raised points about the environmental impacts. Figure 8 provides a breakdown of the frequency of 'issues' raised throughout the consultation responses. Where respondents raised multiple issues, this has been accounted for in the graph. Where respondents raised the same issue multiple times, this has been discounted. Some responses were labelled as 'environmental' and a more specific issue e.g. construction impacts or water quality and resources. In these cases, the responses have been accounted for in Figure 8.

After 'environmental', the key recurring issues related to water quality and resources, carbon emissions and energy and marine (particularly the perceived potential impacts of brine on the marine environment).

Where comments have been categorised as ‘other’ these comprised of general comments for example a general statement relating to water shortage or a general supportive / unsupportive statement relating to the Base Case proposals.



**Figure 8 Key issues raised**

### 3.4.1. Base Case (desalination)

#### Environmental

##### *Impact of brine on the Solent*

A total of 24% of individual respondents raised concerns about releasing the wastewater (brine) back into the Solent, increasing to 35% when taking into account statutory and non-statutory group responses. Concerns mainly related to the impact on the marine environment (with particular reference to the Solent and Dorset Coast Special Protection Area), and some respondents noted that the Solent is already in an ‘unfavourable’ condition due to poor water quality which could make it more vulnerable to the impacts of brine. Concerns about potential impacts included the potential to alter the chemical composition of the water through the release of brine, with associated impacts on the marine wildlife.

Some respondents questioned whether the Solent was a viable location for the release of brine due to its shallow depths and suggested alternative locations may be more suitable to release the brine due to larger

tidal shifts and deeper waters. A few respondents queried whether the release of brine would affect the tidal flow.

Questions were also raised about whether the discharge of brine would impact on the bathing water quality and recreational activity on the Solent.

### ***Impact of abstraction and discharge pipes***

Some respondents showed concern about the impact the abstraction and discharge pipes would have on the local environment. In particular, this included the impact of pipe construction on the seabed off Calshot, and the potential for fish entrainment in the pipelines.

### ***Waste to landfill***

Some individual respondents noted that the desalination plant would involve sending concentrated solid matter waste product to landfill and raised concerns about this. Suggestions were made to explore other options for waste disposal, along with requests for further detail about the content of the solid waste and location for disposal.

### ***Traffic and transport***

Concerns were raised by some respondents about the impact of the pipeline routing on the A326. It was noted that there is existing pressure on the road, particularly at peak times, and that this is only due to increase as other developments in the Local Plan are brought forward, including the Fawley Waterside housing development<sup>9</sup>. Confirmation was requested that the development would not result in closure, diversion or traffic management measures on the A326 due to its use for employees of businesses in the area including the Budds Farm Wastewater Treatment Works and ESSO.

Some respondents were accepting of short-term construction impacts (and associated noise impacts) on the local road network. Other respondents raised general concerns about the impact of the construction of the desalination plant on the local road network, and the associated air quality and noise impacts which would affect local residents.

### ***Landscape, visual impacts and seascape***

Some respondents raised concern about the landscape and visual impact of the desalination plant and requested clarity on the proposed design. Of particular concern in this regard was the proximity to the New Forest National Park, the coast and the surrounding area.

### ***Historic environment***

The historic environment was a feature of some respondent's comments. In particular, reference was made to the potential for pipeline routing to impact upon heritage features (both scheduled and non-scheduled) and the need to ensure appropriate mitigation. It was noted that the excavation associated with the pipeline

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<sup>9</sup> <http://future.fawleywaterside.co.uk/the-masterplan/>

routing may on the other hand provide opportunities for developing greater understanding of the heritage of the local area.

### ***Air quality, dust, odour, artificial light, smoke and steam, and noise***

Many respondents raised concerns about the noise and vibration associated with the operation of the plant and the impact on residents, in particular due to the pumping station. Concerns were expressed relating to cumulative noise impacts with other developments in the area and impacts of noise on biodiversity.

Additional information was requested in relation to noise.

Light pollution was also mentioned, and associated impact on terrestrial ecology and local residents, along with the air quality impacts of the operation.

Comments relating to construction impacts have been referenced in the section below.

### ***Biodiversity***

Where respondents provided comments relating to biodiversity, these mostly related to the impact of abstraction and discharge on the marine environment and in particular the European designated sites. Comments relating to biodiversity tended to be quite general, with respondents noting that the proposed development would impact on the wildlife, particularly in the New Forest National Park.

The Habitat Regulations were referenced in some consultation responses, citing the need to ensure that there are no feasible alternative solutions that would be less damaging.

### ***Access and recreation***

A few respondents noted the potential impact of construction on public rights of way, in particular those in regular use by horse riders, walkers and cyclists. A concern was that some of the pipeline routing options would sever public rights of way, affecting safe access to the New Forest and resulting in users to use the local road network which itself would be affected by greater levels of construction traffic resulting in safety concerns.

### ***Socio-economic***

It was recognised by some respondents that the desalination plant would likely bring investment and employment opportunities. Some respondents raised concern however that local businesses would be affected by the presence of the desalination plant, and others queried the impact of the brine on fish stocks and how that could impact the local fishing industry. The impact of the brine on the oyster beds in the Solent was of some concern.

### **Climate change and carbon emissions**

Many respondents raised concerns about the perception of high energy usage associated with a desalination plant. These concerns primarily related to the associated carbon output and associated cost.

Based on the perception of high energy demand, some respondents queried whether a desalination plant would be aligned to both national government and local authority targets for net zero carbon. It was also queried whether a desalination plant would be aligned to Southern Water's target as an organisation to be carbon neutral by 2030.

Some respondents raised questions about how the desalination plant would be supplied with energy including reference to low carbon energy sources and working with local community energy groups.

## Location

### ***Desalination plant***

Significant concerns were raised by some respondents about the proposed location of the desalination plant. Whilst some respondents noted that details of the precise location, size and design of the plant should be provided to enable an informed comment, others raised concerns about the general area within which the desalination plant is proposed.

The most common concern raised relating to the location was the siting of the plant within the New Forest National Park due to the associated environmental impacts, followed by the proximity to environmental designated areas. The responses included suggestions that the plant should be located on a brownfield site or located away from residential areas and Ashlett Creek. It was also noted by some respondents that the currently proposed location would result in further urbanisation of the New Forest Solent Waterside and impact on the Fawley Waterside redevelopment and that the road capacity in this area was already restricted.

### **Pipeline to transfer to network**

Some respondents expressed concerns about the pipeline routing to transfer the drinking water to the Testwood Water Supply Works. This primarily related to the disruption likely to arise for residents and businesses during construction, particularly to those in the Waterside area, and in combination with other developments in the area. The need to avoid archaeological sites was noted, along with reference to impacts on the Fawley branch railway line.

### **Cumulative impacts**

Concerns over cumulative impacts with other existing and proposed developments in the area were raised throughout the consultation responses.

Some respondents made reference to the Fawley Waterside Development and, in particular, the combined impact of the two developments on the local road network, which is already considered to be under pressure, along with the impacts on the landscape which is becoming increasingly industrialised. Noise was raised as a concern by some respondents, making reference to existing developments which already result in noise disturbance to local residents, and the additional noise that would arise through the proposed pumping station

Cumulative impacts with the Solent Freeport, A326 road improvements and the potential re-opening of the Fawley railway line as a passenger line were also noted.

### **Construction impacts**

Where respondents cited concerns and raised queries relating to construction impacts, the most common responses related to the disruption to local residents associated with the proposed development, the impact on the local road network and the potential disruption that pipeline routing would cause.

Respondents requested further information about the likely disruption, and some raised concerns about the impact on the environment and the likely noise and air quality impacts.

Some respondents recognised that construction impacts would be short term and either mitigated or managed, and others noted that the disruption would be excessive, particularly for local residents and users of the local road network.

## Other

### **Cost**

Many respondents raised concern about both the upfront and long-term cost associated with the desalination plant. Clarification was requested about whether the costs would be passed on to customers through water bills and queries were raised by a number of respondents about whether the perception of high associated cost would be economically viable based on the understanding that the plant would be used at full capacity only intermittently.

### ***Water quality and resources***

Some respondents queried whether the water produced by the desalination plant would be up to drinking water standard, particularly as the Solent experiences heavy shipping activity. Other respondents noted that the water would be softer, which would be of benefit to Southern Water customers although engagement would be needed as residents are used to hard water and some have water softeners installed.

### **3.4.2. Desalination alternatives**

Respondents expressed similar concerns about the desalination alternatives to that of the Base Case, although some respondents recognised that the impact from an environmental, carbon and cost perspective would be lower. Concerns were raised about the location in the National Park and at Ashlett Creek, along with the potential to impact environmentally designated areas and the local transport network in particular. Respondents suggested that further information should be made available and an assessment of the environmental impacts provided.

### **3.4.3. Water recycling alternatives**

On the whole, respondents were supportive of water recycling as an alternative to desalination, with particular reference made to the **perceived lower environmental disturbance, lower cost and energy usage.** However, some respondents **noted that the limited information provided in the consultation brochure made it difficult to provide a fuller opinion, and requested additional design information and environmental impact information.** There was concern raised about the alternative B2 proposal to release recycled water into the Upper Itchen, and abstraction impact on the chalk rivers.

Some respondents raised similar concerns to those raised about the Base Case including disruption to the community during construction, financial implications and alignment with climate change targets. A few respondents queried whether the water would be of an acceptable quality for drinking.

### **3.4.4. Water transfer alternatives**

Comments varied between respondents who compared the water transfer alternatives with the Base Case, and respondents who provided comments independently on water transfer alternatives.

Of the respondents who compared the water transfer alternatives with the Base Case, many considered the alternatives would have fewer environmental impacts and lower financial implications. Some respondents raised similar concerns to those raised about the Base Case including construction impacts on the environment, community and local road network.

Whether the water transfer alternatives would provide long term availability to Southern Water customers was questioned, in particular around whether water would continue to be transferred and therefore available to Southern Water customers during a drought period. The long term sustainability of the local rivers and their spring sources was queried, in particular whether there would be an impact on the spring sources which supply the River Ems (a river that, it was noted, is already sensitive to abstraction).

### 3.4.5. Consultation

The majority of respondents who provided comments on the consultation noted that they had not been directly informed about the consultation and had found out through a second party (such as another resident on social media or protesting leaflets through their door). Some respondents who are Southern Water customers suggested that information should have been provided to them directly, and some local residents felt that they had intentionally not been directly consulted.

Whilst some respondents felt that the online platform was effective, more respondents found it difficult to navigate the platform, particularly on a tablet or mobile phone.

Some respondents said they found the consultation brochure to be too long, repetitive and complicated. Some respondents suggested additional information (such as more detailed environmental information and more specific location information) should have been provided to enable an informed response. There were supportive comments on the consultation from some respondents who welcomed the engagement received to date.

### 3.4.6. Needs case

Some respondents questioned whether additional water resources are necessary and suggested that there is sufficient rainfall in the UK to manage water supply. Some respondents suggested that there were alternatives to large scale intervention which meant that a desalination plant is unnecessary. Alternatives included a focus on leakage, improving water usage efficiency, and improving storage of water. There were some respondents who questioned the need for a desalination plant based on a 1-in-200-year drought.

### 3.4.7. Other suggestions

Some respondents provided alternative suggestions to the Base Case and the alternative solutions. The suggestions included:

- Repairs to existing infrastructure to reduce leakage
- Storage of rainwater in reservoirs or tanks
- Focus on reducing demand and increasing efficiency of water usage
- Water recycling including grey water
- Transferring flood water or other water resources from elsewhere
- A national approach to water resource management
- An integrated catchment management approach
- Use of local groundwater
- Incorporating opportunities to improve nitrates issue

## 4. Summary and next steps

This Consultation Feedback Report provides an overview of the consultation responses received during non-statutory public consultation which ran from 8th February to 16th April 2021. The Report identifies key issues raised, highlighting areas which were of particular concern to consultees.

Southern Water will hold further consultation on its scheme proposals before submitting a consenting application, which will be used to gather more feedback to inform the development of its proposals.

The scope of this document does not include how Southern Water has considered and had regard to the consultation feedback. This will be included at the next appropriate stage in the consenting process.

In the meantime, Southern Water will continue to engage with stakeholder groups including local communities to ensure continued dialogue and relationship building. A range of channels will be employed, including technical working groups, briefings and one-to-one meetings.

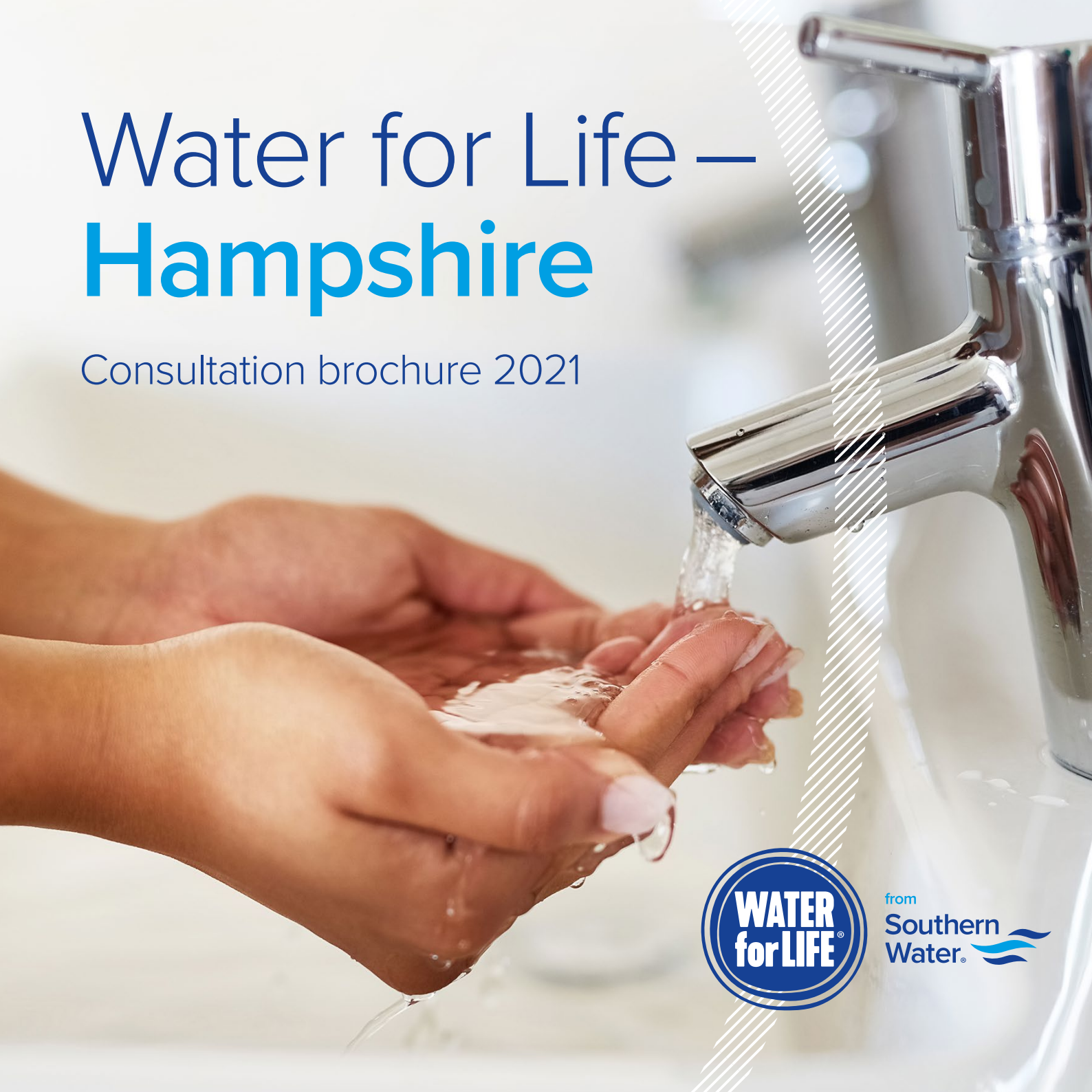
# Appendix

- A Consultation Booklet
- B Feedback Form
- C List of Stakeholders
- D Press Release

# Appendix A: Consultation Booklet

# Water for Life – Hampshire

Consultation brochure 2021



from  
Southern  
Water. 

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# Foreword from Ian McAulay, our CEO



## Thank you for taking the time to engage with our Water for Life – Hampshire programme.

**It's our response to the combined impacts of population growth and climate change and will help keep the county's taps and rivers running for us and future generations.**

In our consultation documents you'll see how we plan to transform the way we source, treat and supply water across Hampshire and the Isle of Wight over the next decade. You'll also see the opportunities for you to contribute your views to help us shape our plans.

Water is a precious, and increasingly scarce, resource for people and wildlife. It's essential that we strike the right balance between protecting the environment and maintaining supplies for customers.

In Hampshire, that balance means taking less water from the sensitive chalk stream habitats of the Test and Itchen rivers and more from sustainable, resilient sources instead.

People need water and it's our duty to supply it, but as custodians of the environment it's also our responsibility to do so in a way that protects the natural world and also enhances it where possible.

We are one of the best performing water companies for leakage, but our plans include going even further and reducing leakage by 15% by 2025, 40% by 2040 and 50% by 2050. We are also improving water efficiency by helping people reduce their use to below 100 litres a day.

We are also creating a new network of water mains across Hampshire to increase resilience.

Investigating and delivering new sustainable, resilient sources of water comes at a cost. Treatment techniques such as desalination and water recycling are already used to great effect elsewhere in the world and are capable of providing an almost limitless supply of water.

They are expensive to build and run, compared with traditional abstractions, but if you consider the environmental and natural capital evaluations, these technologies allow us to do more than just take from the environment – they allow us to give something back.

This ethos of added value, of environmental net gain, is central to the vision and commitment we have outlined in Water for Life – Hampshire.

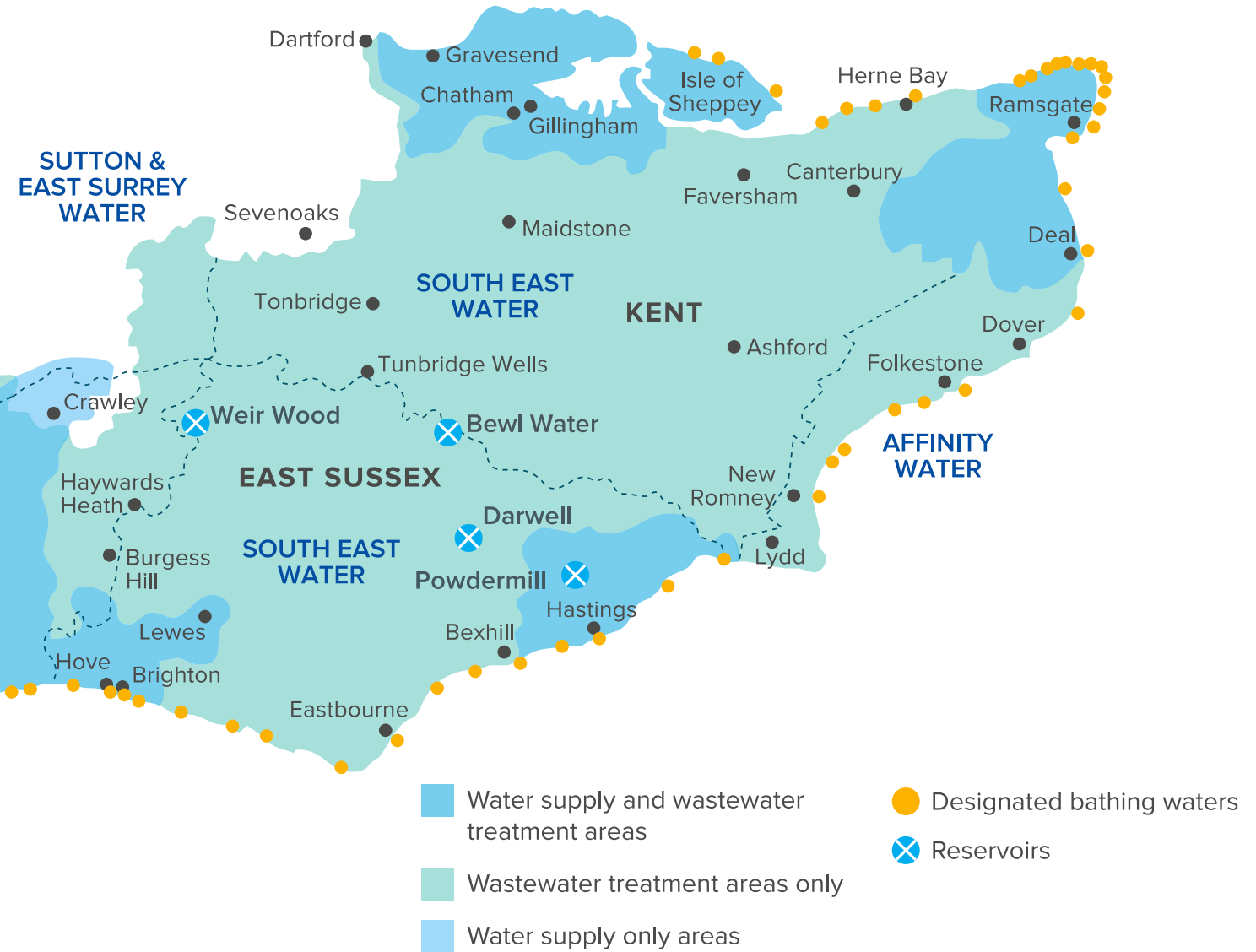
It's our promise to work with regulators, customers, environmental groups, local authorities, industry, landowners and others to create a resilient water future for the South East. But more importantly, it is about performing our duties in a way that benefits people and our planet and I welcome you in joining us on this journey.

# About Southern Water

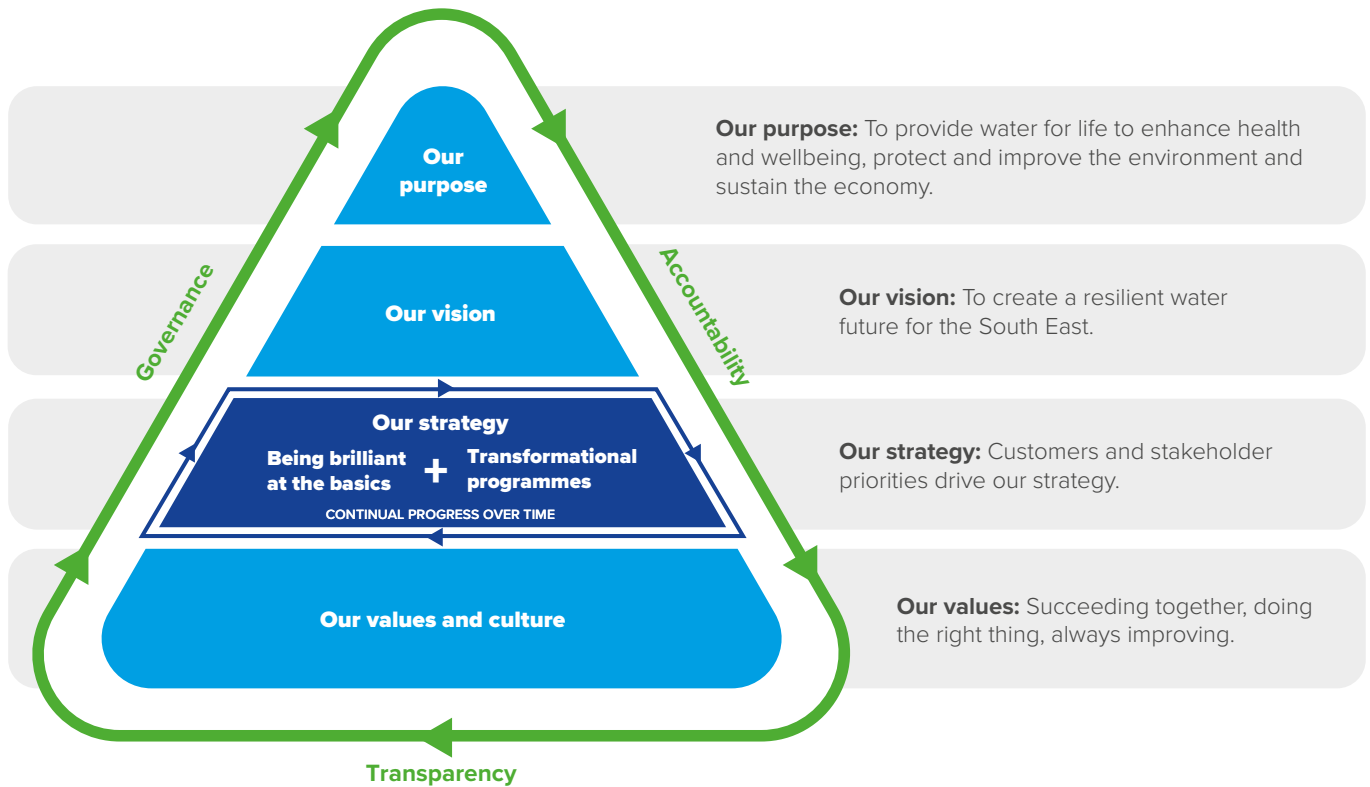
**Southern Water supplies water and wastewater services to over four million customers in the South East.**

Our operations cover Hampshire, Kent, Isle of Wight and East and West Sussex, traversing over 700 miles of coastline, national parks, forests and Areas of Outstanding Natural Beauty.





# About Southern Water



## Our vision, values and purpose

As a water undertaker, we must meet our statutory duties to prepare and maintain a Water Resources Management Plan (WRMP) under section 37A of the Water Industry Act 1991. Our WRMP must set out how we will manage and develop water resources to meet our supply obligation for at least the next 25 years, and it must be renewed at least every five years.

Our WRMP 2019 sets out our Preferred Strategy to meet supply obligations (see: [southernwater.co.uk/our-story/](https://southernwater.co.uk/our-story/))

[water-resources-planning/water-resources-management-plan-2020-70/](https://southernwater.co.uk/water-resources-planning/water-resources-management-plan-2020-70/)) and we are using all best endeavours to deliver on this strategy for our Western Area in Hampshire. Delivering new water resource infrastructure in Hampshire is part of the Preferred Strategy.

Our Business Plan 2020–25 underpins our approach (see: [southernwater.co.uk/our-story/our-plans-2020-25/our-business-plan-2020-25/](https://southernwater.co.uk/our-story/our-plans-2020-25/our-business-plan-2020-25/)).

# About Southern Water

## Protecting the environment

**The environment is at the heart of everything we do and we recognise that, as a water company, we are reliant on the natural environment to deliver our essential services to our customers.**

We are proud to play a leading role as a custodian of the environment and we are working hard to ensure that protecting and enhancing the natural world remains central to all our decision making. We know that investing in more natural and sustainable solutions can deliver wider benefits for wildlife, customers and communities. These include reducing flood risk, reducing our carbon footprint, improving biodiversity and improving health and wellbeing through access to nature.

Over the next five years we plan to invest around £800 million in our environment programme. This will help us improve nearly 400km of our region's rivers and many of its bathing waters. We're working with a range of partners to ensure that we're doing the right thing now and for future generations.

We, and other water companies in the UK, have also committed to become carbon neutral by 2030. This promise was made under the industry body Water UK's Net Zero commitment and is part of our planning and solution development for Water for Life – Hampshire.



“We put the environment at the heart of our business because we, and our customers, want to protect and enhance the natural world around us. Our climate is changing and it's vitally important that we take the right decisions now to ensure that in the future our children and grandchildren can enjoy both a fantastic environment and a clean and plentiful water supply.”

**Toby Willison, Director of Environment and Corporate Affairs**



Chalk stream

# About Water for Life – Hampshire

## The challenge we face

**Hampshire faces water shortages. New water sources are necessary to keep local taps and rivers flowing today and in the future. Our Water for Life – Hampshire programme will create greater resilience, especially during dry weather and drought.**

Our world is changing – the twin pressures of more extreme weather events and a growing population are stretching our finite natural resources, including water. This challenge is felt strongly in the water-stressed South East where the population continues to grow.

In Hampshire, a key challenge we face is ensuring protection of the environment while maintaining and improving the water supply. This follows new rules over how much water we can take from the county's two main rivers – the Test and Itchen. We have entered into an agreement with the Environment Agency, committing to implement the changes it has made to our abstraction licences – rules governing how much water we can take from the environment to supply to the public – by 2027 in order to ensure the rivers are further protected. Reductions to our abstractions mean we now have a shortfall of about 190 million litres of water a day in south Hampshire during a 1-in-200-year drought event, putting the population at risk of water shortage when the weather is dry. Further licence changes are expected which, during a drought, could lead to the loss of more water required to supply Hampshire and the Isle of Wight.

This means we need to find new sources of water in order to protect these sensitive habitats. The Test and Itchen are among the finest examples of chalk streams in the world – rare ecosystems that support an abundance of wildlife such as salmon, trout, crayfish and dragonflies. However, they also supply water to more than 700,000 people across Hampshire and the Isle of Wight. A new balance must be struck in order to keep these rivers and customers' taps flowing – especially during a drought.

In the short term, drought orders and drought permits can be employed where necessary to maintain supplies during periods of drought, however longer term solutions are needed to make up the shortfall.

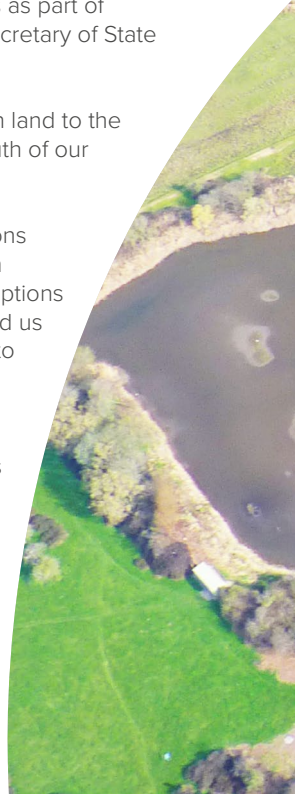
Our current plan for making up the shortfall is set out in our final Water Resources Management Plan 2019 (WRMP19) and includes building our “Base Case”.

We refer to the “Base Case” throughout this consultation. It describes the current preferred solution, as outlined in WRMP19, to install a 75 MI/d (million litres per day) desalination plant with direct input into our network at Testwood Water Supply Works. This was selected following extensive consultation with customers and stakeholders as part of WRMP19, which was then approved by the Secretary of State for Environment, Food and Rural Affairs.

The site outlined in our WRMP is at Fawley, on land to the west of the former power plant and to the south of our Ashlett Creek Wastewater Treatment Works.

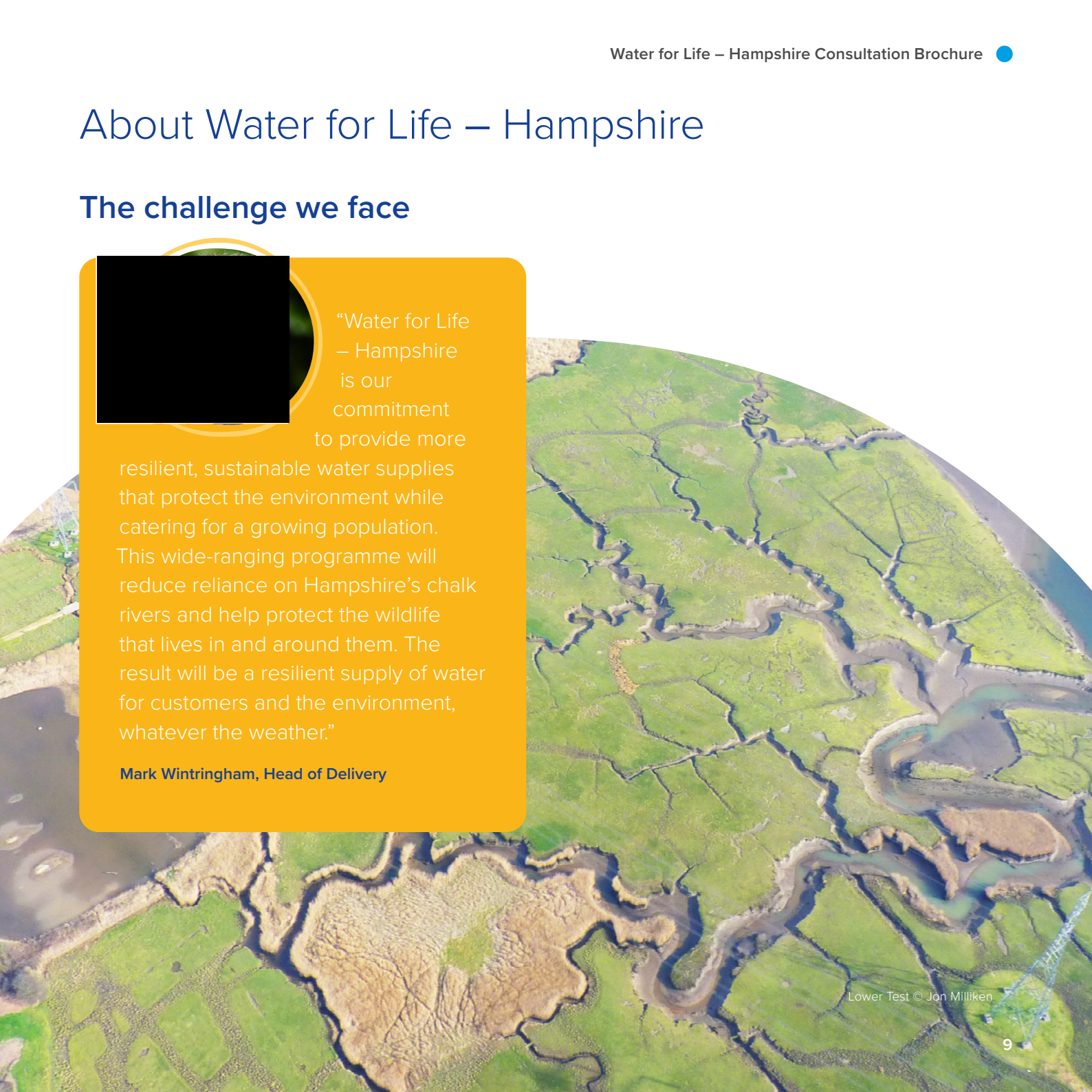
We have a legal obligation to explore all options to deliver the Base Case, but we also have an obligation to investigate back-up alternative options under WRMP19, and our regulators have asked us to investigate these alternatives as back-ups to desalination in case it proves undeliverable.

Accordingly, this document outlines our proposal for the Base Case and also provides information on the alternative options we are investigating in parallel, should the Base Case not be deliverable.



# About Water for Life – Hampshire

## The challenge we face

An aerial photograph of a river network in a green landscape. The river flows through a series of meanders and loops, creating a complex pattern of waterways. The surrounding land is lush green, with some areas appearing to be agricultural fields. A yellow text box is overlaid on the left side of the image, containing a quote and the name of Mark Wintringham, Head of Delivery. The text box has a circular cutout at the top left corner, revealing a black background.

“Water for Life  
– Hampshire  
is our  
commitment  
to provide more

resilient, sustainable water supplies that protect the environment while catering for a growing population. This wide-ranging programme will reduce reliance on Hampshire’s chalk rivers and help protect the wildlife that lives in and around them. The result will be a resilient supply of water for customers and the environment, whatever the weather.”

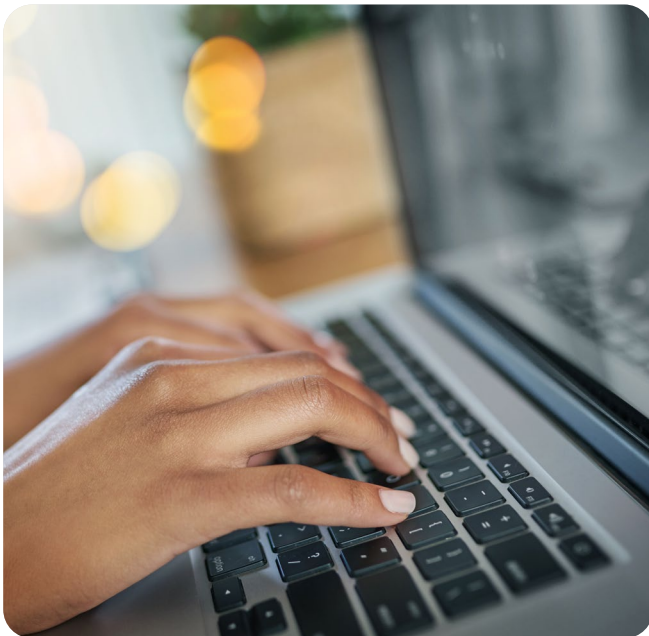
**Mark Wintringham, Head of Delivery**

# About this consultation

## Welcoming your views

The purpose and intent of our consultation exercise is to consult on our Base Case as presented in the WRMP19 Preferred Strategy, which we are obliged to make all best endeavours to deliver. As required by WRMP and the RAPID Gated process, we are also considering alternative options in the event that the Base Case should prove not to be deliverable.

At this stage, we are not consulting on a ‘choice’ between the Base Case and the alternative solutions, as this strategy was already the subject of consultation in WRMP19. However, comments in relation to the Base Case and our alternatives are welcomed to help us to develop the Base Case and the alternatives. Should the Base Case not be deliverable, we will undertake further consultation on our alternative solutions.



**We are seeking views on the following elements of the Base Case, where we are considering options for the most appropriate form of development to include as part of the project:**

- Options for abstracting water from the Solent
- Information on the desalination plant infrastructure and the ways we are considering managing the cleaned wastewater (brine) removed from the seawater
- The alignment of the underground pipeline, to connect drinking water produced by the project, to our network

**The wider aims of this consultation are to:**

- Inform impacted and interested stakeholders and customers about the development of the Water for Life – Hampshire programme
- Gather feedback from stakeholders and the community on elements of the Base Case to help inform the development and design of our proposals
- Gather feedback from stakeholders and the community on alternative solutions, should the Base Case not be deliverable
- Identify key issues and concerns about the impacts and effects of our proposals and identify potential ways to help mitigate them

# About this consultation

## Welcoming your views

In light of COVID-19, we are taking a digital-first (online) approach to consultation and making use of technology to bring the scheme to life for customers and stakeholders. This is embodied by the Virtual Engage platform provided by our supplier Arup, which allows people to navigate a virtual consultation room and browse information boards, watch films and leave feedback – just as they would be able to in a physical drop-in session. This virtual room is available on our website - via the link in the box to the right.

We will provide one copy of the consultation brochure and feedback form, free of charge, to those unable to access them via the internet. These, and large print files, can be obtained by writing to us.

In preparation for this consultation, we have engaged with local authorities to help us identify hard to reach groups. We are contacting these groups individually to seek their advice on the best way of raising awareness and consulting with their members.

We will also explore more traditional methods of consultation as part of future rounds of consultation on the project (e.g. face-to-face meetings and events), when it is safe to do so.

In our initial engagement with each of the county's local authorities, we have asked for their support in helping us improve the reach of our digital communications. As a result, the consultation links have been shared via numerous newsletters, mailing lists and social media channels. A similar request was also made to other organisations and individual stakeholders to share via their networks. We are immensely grateful for this support.

This brochure provides information on the proposed elements of the Base Case, information on how consultation will be used to develop the Base Case further, and how to share your views. We would encourage you to read this brochure, attend

the online consultation event and provide your thoughts by completing a feedback form.

The easiest way for you to send us your feedback is to complete the online feedback form. To request a printed copy of the form and this brochure please write to:

**WATER FOR LIFE – HAMPSHIRE, PO BOX 5215**

The address must be written in capital letters and you do not need a stamp.

If you have any further questions or would like to find out more, visit our web pages or contact us by email.

Website:

[www.southernwater.co.uk/water-for-life-hampshire](http://www.southernwater.co.uk/water-for-life-hampshire)

Email:

[WFLH@southernwater.co.uk](mailto:WFLH@southernwater.co.uk)

Your feedback is important to help us shape a solution for ensuring future water supply in Hampshire. We will consider all the comments we receive and use them to help us develop our proposals further.

This is your opportunity to give your views and the information we receive will help us develop our proposals.

# The story so far

## The needs case

**Environmental and external pressures are driving the need for Water for Life – Hampshire. However, the immediacy of the challenge comes from the need to meet the expected future supply deficit after the planned changes to our abstraction licences. Additionally, drought permits and drought orders will also be less available during drought conditions after 2027. Drought permits and orders allow water companies to maintain public supplies by taking water beyond their abstraction licence limits.**

For the past three years (2018–2020) we have needed to prepare applications for a drought permit on the River Test in accordance with our legal agreement with the Environment Agency. However, although a drought permit was granted in 2019, we have not needed to actually implement one, as subsequent rainfall raised the river levels meaning reliance on a drought permit was no longer required.

To offset the potential environmental impact of drought permits and drought orders, we have embarked on a £9.5 million suite of environmental monitoring and improvement projects that are being developed and delivered by local environmental organisations. This work is being funded and delivered regardless of whether a drought order or permit is implemented.

### Activities already under way include:

- Monitoring of wildlife including fish, breeding birds and Southern Damselfly
- Working with Bristol Zoo to breed White Clawed Crayfish for wild release
- Restoring rivers to more natural states by removing man-made barriers and clearing areas of non-native invasive vegetation such as Himalayan Balsam

In the legal agreement with the Environment Agency (made under Section 20 of the Water Industry Act) we committed to using “all best endeavours” to implement the long term scheme for alternative water resources set out in our final WRMP19, which is called the ‘Preferred Strategy’. We have set out in our WRMP19 when each element of the Preferred Strategy will be delivered by. The largest element of it, which is a 75 MI/d desalination plant will be delivered in 2027, with other elements later than this. This is because the phased reductions to our abstraction licences will mean that a large part of our deficit will need to be met by 2027. The proposed desalination plant will be capable of taking sea water from the Solent, treating it and pumping it via a new underground pipe to our Testwood Water Supply Works where it will be sent into the supply network.



White-clawed crayfish © Ben Rushbrook

# The story so far

## Introducing our Base Case

We refer to the “Base Case” throughout this consultation – it describes the current preferred solution, as outlined in WRMP19, to install a 75 Ml/d desalination plant at Fawley with direct input into our network at Testwood Water Supply Works.

**This was selected following extensive consultation with customers and stakeholders as part of WRMP19, which was then approved by the Secretary of State for Environment, Food and Rural Affairs.**

The site outlined in our WRMP is at Fawley, on land to the west of the former power plant and to the south of our Ashlett Creek Wastewater Treatment Works.

The desalination plant will take water from the Solent via an inlet. The water will be treated at the plant before it is pumped up to our Testwood Water Supply Works, where it will join the supply network. The brine (salty water) produced as part of the desalination process will be released back into the Solent via an outfall, the location of which is currently being developed.

### Overview of RAPID

**The development of the Base Case, and the investigation into alternatives that may be suitable back-up solutions to the Base Case, is being overseen by the new Regulators’ Alliance for Progressing Infrastructure Development (RAPID) as part of the new formal gated funding process for the development of strategic water resources options.**

RAPID comprises the three water regulators (Ofwat, Environment Agency and Drinking Water Inspectorate) and is advised by Natural England. Its role is to review progress and determine how, and if, the strategic water resources solutions that are being considered should proceed further

through the process. It will make recommendations to Ofwat at various stages of the process, known as ‘gates’. Ofwat will then release development funding for each solution as it passes through the ‘gate’ so it can continue to be developed to the next stage of feasibility. The aim is to enable companies to develop solutions on behalf of customers that are construction-ready in 2025 –2030 that protect and enhance the environment and benefit the wider society.

We have earlier gate times than the rest of the water industry because our need for a new water source is earlier than other companies, as a result of our forecasted supply deficit after 2027. We submitted our first set of documents to RAPID in September 2020 and it has since published its full response on its website. A link to this can be found in the Technical Documents section of our Water for Life – Hampshire webpages.

“The desalination infrastructure lies within the Solent and Southampton

Water. We’re working closely with the Environment Agency, Natural England and others to ensure we take particular care of this sensitive environment.”

**Nicola Meakins, Enabling Manager**

# The story so far

## Alternatives we’re investigating as back-ups

In addition to developing and delivering the Base Case in line with our “all best endeavours” commitment, we are also exploring a range of alternatives as a back-up, in case the Base Case is not deliverable. Exploring these alternatives is essential in order to ensure customers’ supplies are maintained. However, it should be noted that, because of our commitments to use “all best endeavours” to deliver the Base Case, the options for a new water supply are not presented as a straight choice between the Base Case and the alternatives – instead, the alternatives will only be considered for delivery should the Base Case be undeliverable.

We outlined eight potential back-up solutions and submitted them as part of the RAPID process.

### They fall under three categories:

- Desalination alternatives
- Water recycling
- Water transfer

The solutions are listed under the following eight configurations:

### Desalination alternatives

- Configuration A.2: 61 MI/d at Ashlett Creek, near Fawley
- Configuration D.1: 40 MI/d Desal to industrial use, 30 MI/d Transfer from South West Water, 41 MI/d Recycling

### Water recycling

- Configuration B.2: 61 MI/d recycled water from Budds Farm Wastewater Treatment Works to the Upper Itchen / Havant Thicket Reservoir
- Configuration B.3: 61 MI/d recycled water from Budds Farm Wastewater Treatment Works to Otterbourne Water Supply Works
- Configuration B.4: Up to 61 MI/d recycled water from Budds Farm Wastewater Treatment Works to Otterbourne Water Supply Works via Havant Thicket Reservoir
- Configuration B.5: 75 MI/d recycled water from combination of Budds Farm Wastewater Treatment Works and Peel Common Wastewater Treatment Works

Also included in this consultation:

- Configuration B.1: 61 MI/d recycled water from Budds Farm Wastewater Treatment Works to the Lower Itchen

Configuration B.1 is the alternative option included in our WRMP19. However, it is now not being progressed as a potential alternative to the Base Case following Ofwat’s decision not to fund further investigations. This is a result of RAPID’s recommendation that Natural England and the Environment Agency have concerns about the impact of the recycled water release on the integrity of the River Itchen Special Area of Conservation and the scheme’s ability to meet the resource deficit.

These options are described in more detail on pages 24–26.

# The story so far

## Alternatives we're investigating as back-ups

### Water transfer

- Configuration D.2: 75 MI/d direct raw water transfer from Havant Thicket Reservoir to Otterbourne

These options are described in more detail on page 27.

Also considered but not part of this consultation:

- Configuration C.1: West Country Sources (North) transfers

We submitted a joint proposal with Wessex Water and Bristol Water to RAPID at our accelerated Gate 1 for a regional water transfer scheme called 'West Country North Sources and Transfer'. This scheme is not considered as an alternative to the Base Case as, since our submission to RAPID in September 2020, it has been moved off the earlier gate timetable and is now part of the standard timeline with the rest of the water industry. As such, it would not deliver water supplies to address our forecast deficit by 2027.



“Water recycling is a different, more complex process than traditional water treatment. It involves taking highly treated wastewater and using advanced treatment techniques to clean and purify it to drinking water standards. In essence, all water is already recycled – we’re looking at how to harness and speed up that natural process.”

**Varsha Wylie, Principal Process Engineer**

# Our proposals

## Options for our Base Case

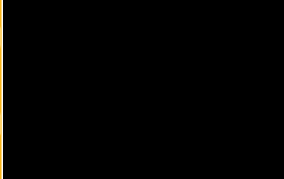
This section of the brochure provides more information on our Base Case solution and the back-up alternative options.

We are considering options for how to best deliver the Base Case, and would welcome your views on how we can further progress components of the scheme so that it is most successful. Components of the Base Case that we are developing, and would welcome your views, on are:

- Options for abstracting water from the Solent
- Information on the desalination plant infrastructure and the ways we are considering managing the cleaned wastewater (brine) removed from the seawater
- The alignment of the underground pipeline, to connect drinking water produced by the project, to our network

Please consider the information presented in this section of the brochure and let us know your thoughts by completing the feedback form.

This section also presents information on our alternative back-up options, which we are preparing plans for in the event that the Base Case is not deliverable. At this stage, we are not consulting on a 'choice' between the Base Case and the alternative solutions, however comments on alternatives will be welcomed and considered in future development of those alternatives. Should the Base Case not be deliverable, we will undertake further consultation on our alternative solutions.



“We’re working with international experts on our desalination plans. The technology has the potential to provide a resilient supply for customers by tapping into a vast water resource – the sea. Taking water from the sea would help us to better protect the Test and Itchen ecosystems by reducing our demand on these freshwater sources in times of drought.”

**Jonny Greenwell, Process Engineer**



# Our proposals

## A.1: 75 MI/d Desalination at Fawley (Base Case)

This is the preferred permanent water resources solution as outlined in our Water Resources Management Plan 2019 (WRMP19). It comprises a 75 MI/d (million litres per day) desalination plant located at Ashlett Creek, near Fawley. The plant will be capable of taking seawater from the Solent, releasing the brine back to the Solent and then transferring drinking water, via a new pipe, to our Testwood Water Supply Works where it will connect into the supply network.

We welcome your views on our Base Case and the components described below.

Our Base Case desalination proposal includes the following key components:

### 1. Abstraction

Water will be abstracted (taken) from the Solent via an intake structure and pipe. We are currently considering two potential areas for this intake:

- Within the existing deep water dock at the former Fawley power station site (Route 1 abstraction)
- The open water area identified as suitable for abstraction as shown in Figure 1, where there are three possible routes for connection (Routes 2, 3 and 4 abstraction)

The intake will connect to a pumping station, either on the coast via an intake pipe constructed beneath the seabed, as shown in Figure 1, or next to the former Fawley power station. The pumping station location and layout is yet to be defined as it will depend on the abstraction location.

The abstraction will be connected to another pumping station, on land near to the Solent abstraction area shown in Figure 1, or near to the former Fawley power station.

We are considering different ways to stop fish swimming into the intake or debris being drawn into the mouth of the abstraction pipe. These include fully submerged “passive” mesh wire screens which stop fish and debris entering the abstraction pipe and mechanical screens within the abstraction pumping station that would carefully collect any fish and debris and return these back to the sea. The preferred screen type is yet to be determined and will depend on the location of the abstraction.

An underground pipeline will transfer the seawater to the desalination plant for treatment. There are a number of routes being considered for this depending on the abstraction location. Under consideration are:

1. **Route 1:** the former power station inlet, with a short connection to the Ashlett Creek site.
2. **Route 2:** developing the WRMP19 option and using the former power station outlet pipes by re-purposing and extending these to carry the abstraction pipe to the area of deep water (Route 2, in Figure 1).
3. **Route 3:** a shorter route from Ashlett Creek site to land near to Lepe Country Park and extending the pipe to the area of deep water.
4. **Route 4:** a longer route from Ashlett Creek site to land near to Lepe Country Park.

The method of pipeline construction is yet to be determined but we are considering using open excavation techniques (where an excavator digs a trench from the surface to lay a pipe) as well as alternative methods such as tunnelling, directional drilling or pipe-jacking (where pipes are pushed through the ground from a pit without disturbing the surface). The type of method we use will depend on the likely impacts and suitable mitigation measures we can employ.

# Our proposals

## A.1: 75 MI/d Desalination at Fawley (Base Case)

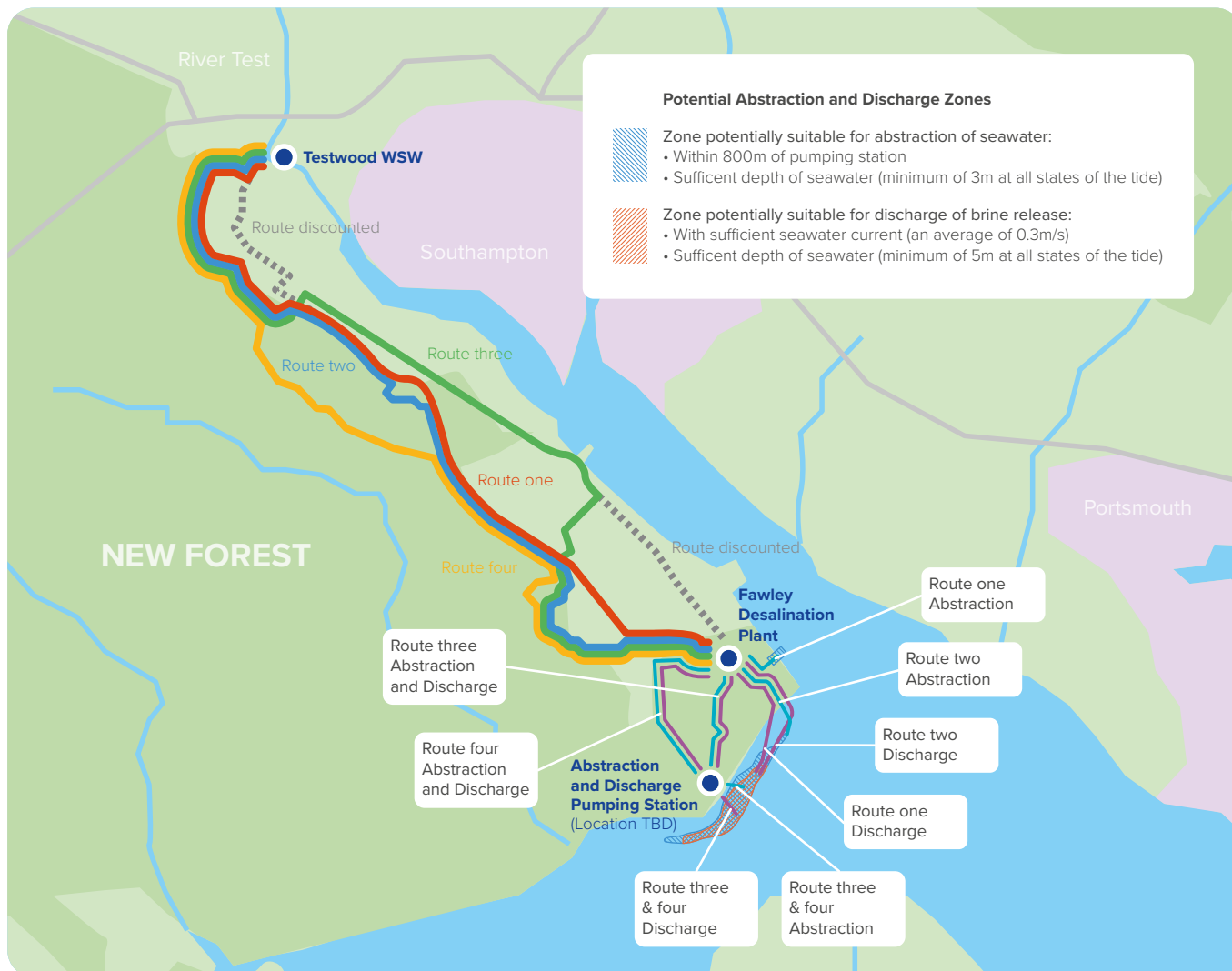


Figure 1: Possible abstraction and release locations, and transfer routes from the desalination plant to Testwood.

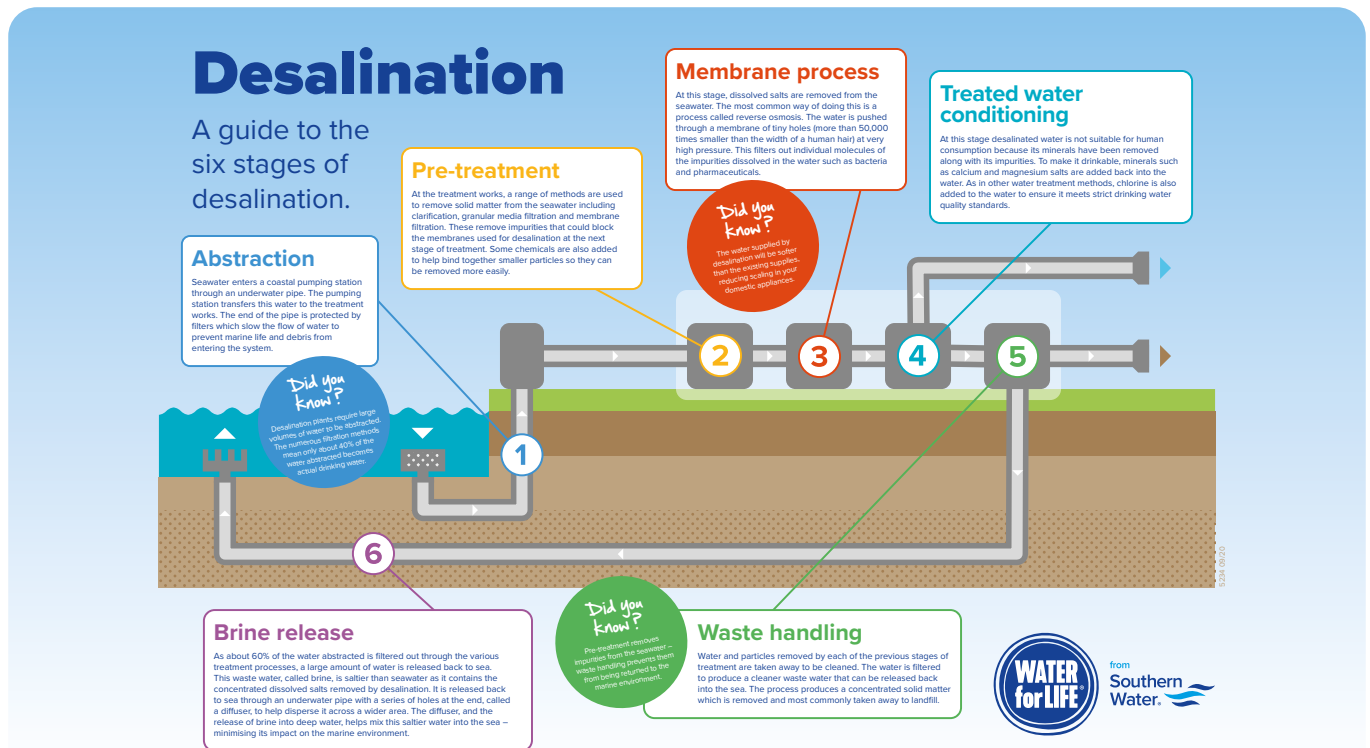
# Our proposals

## A.1: 75 MI/d Desalination at Fawley (Base Case)

### 2. Desalination Plant

The desalination plant is the location where several processes are used to treat the seawater, by removing unwanted particles to make the water suitable for drinking. These processes, explained in the diagram below, clean and purify

the water to ensure it meets strict drinking water quality standards. A number of large buildings, tanks and associated infrastructure will house the various stages of treatment as well as store the treated drinking water.



# Our proposals

## A.1: 75 MI/d Desalination at Fawley (Base Case)

### 3. Waste disposal

Desalination produces waste products. We propose to dispose of these in different ways, according to their requirements.

- The **solid waste** would be sent to landfill, as the salt content means it cannot be beneficially used on farmland
- The **cleaned wastewater (brine)** would be released back to the Solent

An underground pipeline will transfer the brine back to the sea, via an outfall pipe constructed beneath the seabed. We are considering techniques such as tunnelling and pipe-jacking to install this outfall pipe. At the end of the outfall pipe, a carefully designed structure will release the brine into the identified area of deeper water (see Figure 1) where the tidal movement will help it disperse.

The route options and the release areas in the Solent we are considering are shown in Figure 1 and numbered 1-4.

Alternatives to these preferred options are:

- The solid waste could be combined with the liquid waste and released back to the sea. This would need to consider the sensitive marine environment we are releasing into.
- Evaporating water from the brine to form salt crystals that could then be removed from site and taken away either to landfill or to be used for another purpose such as road-gritting. The UK climate means evaporating the water from the salt naturally is not practicable. A more energy-intensive process would be required to heat the brine to encourage evaporation.

### 4. Pipeline to transfer to network

The drinking water produced by the desalination plant will be transferred to Southern Water's network via the Testwood Water Supply Works. The underground pipeline required to make this connection will be around 25km long. The pipe will connect to a new water storage tank at Testwood, from where it will join the wider network on the site. A number of proposed corridors have been developed for this pipeline, as shown in Figure 1.

There are four proposed corridors. A combination of these could be used for a preferred corridor:

- 1. Route 1:** The original WRMP19 corridor: this route follows the A326, then passes through Totton to Testwood. The top section through residential roads has been discounted as it would not be possible to construct such a large, 80cm diameter, pipeline through the constrained areas between homes and existing strategic services.
- 2. Route 2:** This corridor provides an alternative to laying the pipeline all within the A326. Key considerations for this route include existing utility pipes and cables and minimising impact on traffic. The route will cross into adjacent land where possible.
- 3. Route 3:** This option explores whether the disused railway line could be used as a corridor for the pipeline. The southern section was discounted as it would not be feasible to pass through the existing oil refinery both in terms of construction and ongoing access and maintenance of the pipe.
- 4. Route 4:** This route avoids landfill sites and parts of the A326. It would follow the route of existing oil refinery pipelines and minor roads.

The feasibility of these corridors is still being investigated and developed, alongside this consultation. Further, more detailed, discussions with stakeholders, particularly the Environment Agency and Natural England, and other utility providers in the area are planned to help identify a preferred route.

# Our proposals

## Alternative water source solutions

We are considering alternative options in the event that the Base Case proves not to be deliverable. Doing so will ensure we have a back-up solution to maintain customers' supplies.

### Desalination alternatives

#### A.2: Desalination 61 MI/d at Ashlett Creek, near Fawley

This alternative outlines a smaller capacity desalination plant that would use the same site, abstraction and intake location options and release options as the Base Case. The smaller production capacity of 61 MI/d is being considered based on the results of further computer modelling undertaken since WRMP19. The smaller plant would use less power and have smaller waste streams. Supply and demand computer modelling is still ongoing and is helping us understand how often the desalination plant would be required and the maximum flows during severe and extreme droughts.

#### D.1: Desalination 40 MI/d, Transfer from South West Water 30 MI/d, and Water Recycling 41 MI/d

This alternative proposal is a combination of an industrial desalination plant, a smaller water recycling plant and diversion of an existing transfer. There is currently a large coastal industrial facility that uses 40 MI/d of drinking water that could potentially be replaced with desalinated water. The existing supply is provided from two sources, approximately 10 MI/d from Southern Water and approximately 30 MI/d from South West Water. An element of this water (15 MI/d) is further treated by the industrial user to produce 'demineralised' water used in the industrial process.

#### This proposal would provide:

- A 40 MI/d desalination plant for the industrial facility on its land and using its existing intake and release locations. In addition, 15 MI/d of the desalinated water would be further treated by Southern Water to produce 'demineralised' water. These two types of water would be transferred, via separate pipelines, to supply the industrial user.
- The existing 30 MI/d supply to the industrial facility from South West Water would be redirected to Southern Water's drinking water network. This would remove the need for an additional 20 MI/d transfer pipeline from South West Water.
- The desalination option would be supplemented by a 41 MI/d Water Recycling Plant using treated wastewater from Budds Farm Wastewater Treatment Works. This is the same process and pipeline route as proposed for option B.2 as outlined in the following section.



Kingfisher © Andy Ames

# Our proposals

## Water recycling

We are exploring ways of recycling our treated wastewater and using it to supplement other sources of drinking water. We call this method water recycling. It speeds up the natural process of water treatment and means we can keep water in our network – reducing the amount we need to take from the environment.

All the Water Recycling Plants considered as alternatives use highly-treated wastewater from our largest wastewater treatment works at Budds Farm in Havant. The higher outputs

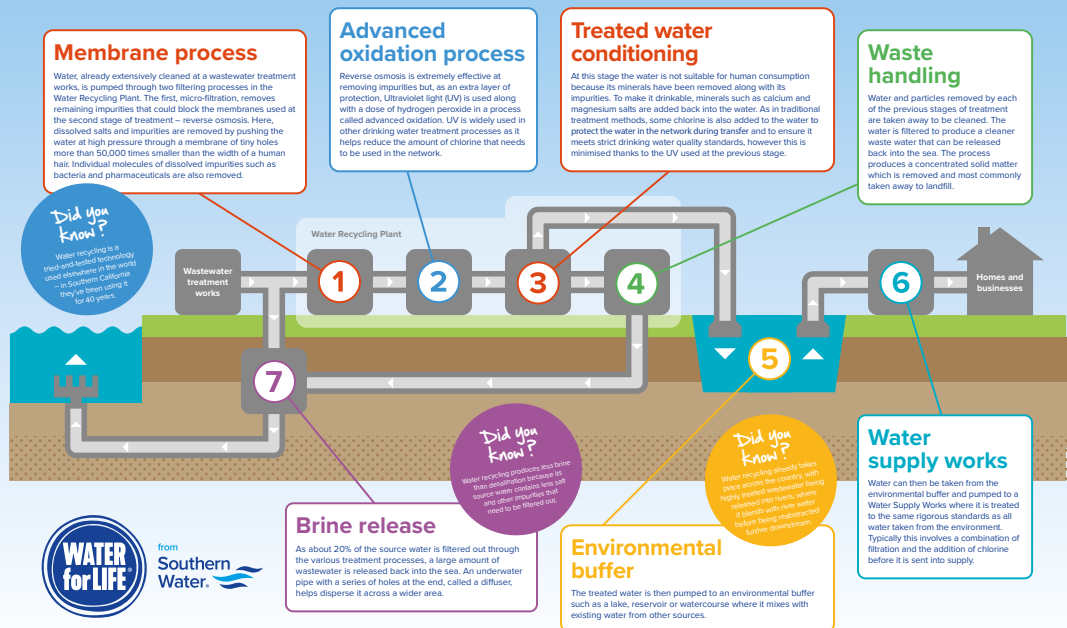
of 75 Ml/d use an additional connection to a second site, our Peel Common Wastewater Treatment Works in Gosport. The water would be transferred from Budds Farm via a short underground pipeline to the Water Recycling Plant.

The Water Recycling Plant uses advanced treatment techniques to clean and purify the water, as detailed in the diagram below. These processes would take place inside a number of buildings and tanks.

## Water recycling

### A guide to the stages of water recycling

Water recycling uses advanced treatment techniques to turn highly treated wastewater, that is usually pumped away into rivers and the sea, into drinking water.



# Our proposals

## Water recycling

The waste handling requirements of water recycling are similar to those of desalination. Waste materials are removed to form either solid waste or brine. Roughly 20% of the treated wastewater would be returned to Budds Farm as brine and released out to sea via the site's existing 5.7km outfall pipe. The solid waste would typically be taken away to landfill or possibly combined with the existing solid waste treatment processes at Budds Farm.

The advanced treatment processes at the water recycling plant produce a purified water that can then be transferred on to blend with other sources of water in a water body such as a river, lake or reservoir referred to as an 'environmental buffer'. From there, the water would be transferred to our Otterbourne

Water Supply Works for further treatment to ensure it meets strict water quality standards.

An alternate configuration, known as 'direct recycling', would see the recycled water sent directly to Otterbourne Water Supply Works for further treatment without first blending with existing supplies in an environmental buffer. The diagram opposite outlines an 'indirect recycling' process.

We are exploring a number of alternative sizes of water recycling plant, and options for transferring the recycled water to Otterbourne Water Supply Works. These are shown in Figure 2 below.



Figure 2: Overview map of Water Recycling Alternatives.

# Our proposals

## Water recycling

### B.1: 61 MI/d recycled water from Budds Farm Wastewater Treatment Works to the Lower Itchen

This configuration uses the proposed Water Recycling Plant with a release into the Lower Itchen river, as originally presented in WRMP19, from where the water could be re-abstracted.

#### It would include:

- Water Recycling Plant capable of producing up to 61 MI/d of recycled water using treated wastewater from Budds Farm Wastewater Treatment Works.
- A 47km underground pipeline to transfer the recycled water to a release point in the Lower Itchen river.
- An abstraction on the Lower Itchen capable of taking up to 61 MI/d of water from the river and transferring it via a new pipeline to Otterbourne for further treatment to ensure it meets strict water quality standards.

This is the alternative option included in our WRMP19. However, it is now not being progressed as a potential alternative to the Base Case following Ofwat's decision not to fund further investigations. This is in line with RAPID's recommendation, following concerns raised by Natural England and the Environment Agency about the impact of the recycled water release on the integrity of the River Itchen Special Area of Conservation and the scheme's ability to meet the resource deficit.

### B.2: Water Recycling Plant 61 MI/d to a lake near Otterbourne WSW

This configuration uses the proposed Water Recycling Plant with a release into a new lake, near Otterbourne, followed by further treatment at the water supply works.

#### It would include:

- Water Recycling Plant capable of producing up to 61 MI/d of recycled water using treated wastewater from Budds Farm Wastewater Treatment Works.
- A 42km underground pipeline to transfer the recycled water to a purpose-built lake. There are a number of alternative initial corridors being considered, as outlined in Figure 3. The pipeline would release into a new lake, most-likely created on land next to our Otterbourne Water Supply Works, where the water would blend with our current river and groundwater abstractions.
- Abstraction and transfer from the lake to Otterbourne Water Supply Works for further treatment to ensure it meets strict water quality standards.

# Our proposals

## Water recycling



Figure 3: Initial corridor routes between a possible WRP location and Otterbourne WSW

# Our proposals

## Water recycling

### B.3: Water Recycling Plant 61 MI/d direct to Otterbourne Water Supply Works

This configuration uses the proposed Water Recycling Plant with a direct connection to Otterbourne Water Supply Works.

**It would include:**

- Water Recycling Plant capable of producing up to 61 MI/d of recycled water, using treated wastewater from Budds Farm Wastewater Treatment Works.
- A 42km underground pipeline to transfer recycled water from the Water Recycling Plant to Otterbourne, where it would blend with other river and groundwater abstractions.
- Further treatment at Otterbourne Water Supply Works to ensure the water meets strict water quality standards.

A number of proposed alternative pipeline corridors are being considered as per Figure 3.

### B.4: Water Recycling Plant up to 61 MI/d to Havant Thicket Reservoir and then combined with Configuration D.2

This configuration uses the proposed Water Recycling Plant to supplement the spring-fed water within Havant Thicket Reservoir. Maintaining the water level in this way would increase the amount available for supply. The size of the plant is still being assessed and developed with Portsmouth Water. This configuration is presented in more detail below with the Water Transfer D.2.

### Water Recycling Plant 75 MI/d to a new lake near Otterbourne WSW

This configuration is the same as Alternative B.2, but with a larger Water Recycling Plant and a larger transfer of water (75 MI/d).

This alternative requires a separate pipeline from our Peel Common Wastewater Treatment Works to carry treated wastewater to the Water Recycling Plant. This would be in addition to the pipeline from Budds Farm to the Water Recycling Plant. Together, these two separate sources of treated wastewater would provide the 75 MI/d required. The development of the pipeline route between Peel Common and the Water Recycling Plant is in early design stages but would approximately follow the initial, roughly 25km, corridor shown in Figure 3.

# Our proposals

## Water transfer

### Alternative use of the proposed Havant Thicket Reservoir

We are collaborating with Portsmouth Water to develop and fund the proposed new Havant Thicket Reservoir as an additional water source to support the water-stressed South-East. The reservoir will be filled with water from the Bedhampton and Havant Springs during the winter months. This scheme is part of Southern Water and Portsmouth Water's current WRMP but is not a potential alternative to the Base Case.

However, we are also working with Portsmouth Water to jointly explore a potential enhanced use of Havant Thicket Reservoir in the future. The proposal involves an additional transfer of water from the reservoir to our Otterbourne Water Supply Works. The potential of topping up the reservoir with recycled water from the proposed Water Recycling Plant is also being explored.

This configuration would involve transferring 75 MI/d of water from the proposed new reservoir to our Otterbourne Water Supply Works. The Havant Thicket Reservoir would have a capacity of approximately 8.7 billion litres.

### D.2: Water Transfer between Havant Thicket and Otterbourne WSW

This alternative comprises an additional abstraction of water from the proposed Havant Thicket Reservoir. It does not include supplementing the reservoir water with recycled water. A pumping station and pipeline would be required to transfer water from the reservoir to our Otterbourne Water Supply Works for further treatment. This underground pipeline would be about 35km long. The pumping station would comprise a small number of buildings and underground chambers connected to the reservoir by underground pipes. The initial corridors being considered are shown in Figure 4.

### Combined Configuration D.2 and B.4: Water Transfer and smaller Water Recycling Plant

This alternative combines configurations D.2 and B.4 to supplement water levels in the proposed Havant Thicket Reservoir with recycled water.

Blending recycled water with the spring water that will naturally fill the reservoir would increase the amount of water available for supply. This would add resilience during a drought and has the potential to further reduce the need to take water from the environment.

This configuration would require a smaller Water Recycling Plant to supplement the reservoir and support the additional transfer of water.

#### It would include:

- A smaller water recycling plant capable of producing up to 61 MI/d using treated wastewater from Budds Farm Wastewater Treatment Works.
- An underground pipeline, about 5km long, to transfer water from the Water Recycling Plant to the reservoir.
- A pipeline to transfer water from the reservoir to Otterbourne Water Supply Works, as outlined in Water Transfer Configuration D.2 on this page.

# Our proposals

## Water recycling

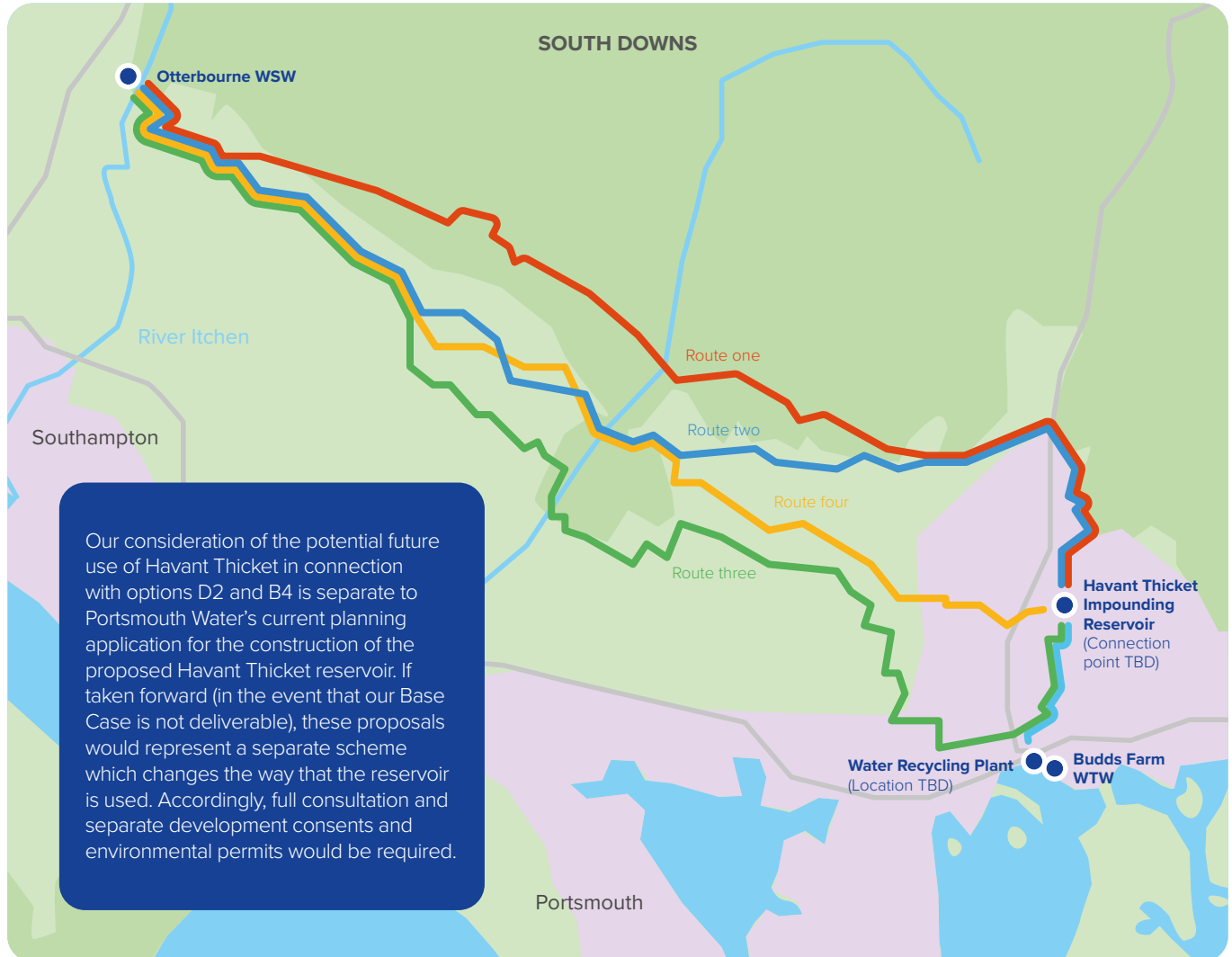


Figure 4: initial corridor routes between the proposed Havant Thicket Reservoir and the Otterbourne Water Supply Works

# Environmental context

## Our legacy

This section describes the surrounding environmental context for our Base Case, a 75 Ml/d desalination plant at Fawley, including the terrestrial, coastal and marine environment.

The Base Case is located within a sensitive environmental context which we will continue to consider carefully as we shape our proposals. In developing our plans, we need to consider and manage potential impacts to a wide range of environmental receptors.

Should our Base Case not be deliverable, we will need to carefully consider the environmental setting of our back-up solutions which also have the potential to impact a wide range of receptors.



“Hampshire, especially its rivers, coastline and marine environment, is

home to a diverse range of wildlife. That’s why we have a team of ecologists working alongside the local wildlife and river trusts to make sure that we minimise environmental impact during construction and deliver a lasting legacy of improved conditions for wildlife.”

**Nicola Catt, Senior Environmental Advisor**

# Environmental context

## Coastal and marine environment

**The proposed seawater intake and outfall lie within the Solent and outer areas of Southampton Water, which are of high biological and nature conservation importance. These waters carry the highest level of environmental protection through national and international nature conservation designations.**

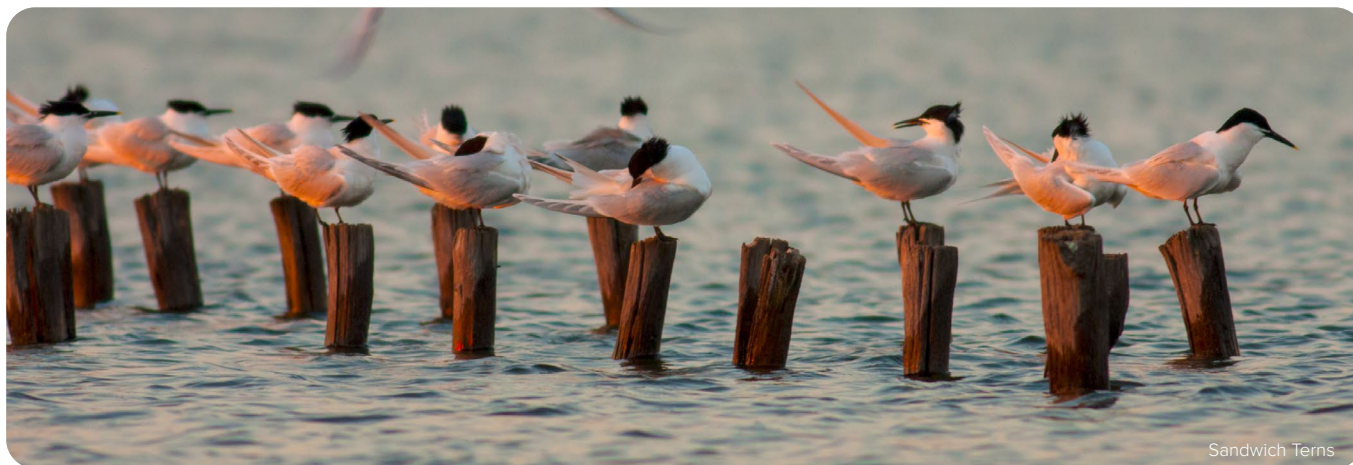
These include Special Protection Areas (SPAs), Special Areas of Conservation (SACs), Ramsar sites, Sites of Special Scientific Interest (SSSI) and Marine Conservation Zones (MCZs), as shown in the image on the next page. European nature conservation sites in the area are due to be incorporated into a National Site Network following the UK's departure from the EU, but are expected to continue to carry a high level of protection. Numerous Priority Coastal and Marine Habitats and Species and protected coastal landscapes are also present.

The proposed seawater intake and outfall are located within the Solent and Dorset Coast SPA which has been designated for important bird species (common tern, sandwich tern and little tern) that breed and feed in the area. The subsea pipelines may

also need to pass through, or near to, the North Solent SSSI and Solent and Southampton Water SPA and Ramsar which support large numbers of breeding seabirds – including gulls and terns in the summer and waterfowl such as geese, ducks and waders in the winter. Large areas of the surrounding coastline are also designated under the Solent Maritime SAC, which is designated for important marine and estuarine habitats and other important features such as salt meadows and mudflats. A number of MCZs are designated in the Solent and wider English Channel, the nearest of which is the Yarmouth to Cowes MCZ located on the north-western coast of the Isle of Wight.

Southampton Water and the Solent, which connect with upstream rivers such as the Test and Itchen, also support the passage of migratory fish species such as sea lamprey and Atlantic salmon. The Solent also supports marine mammal species such as the common seal.

The Solent and Southampton Water are also important for coastal and marine users. For example, for fishing, navigation, other commercial uses and recreation.



Sandwich Terns

# Environmental context

## Coastal and marine environment

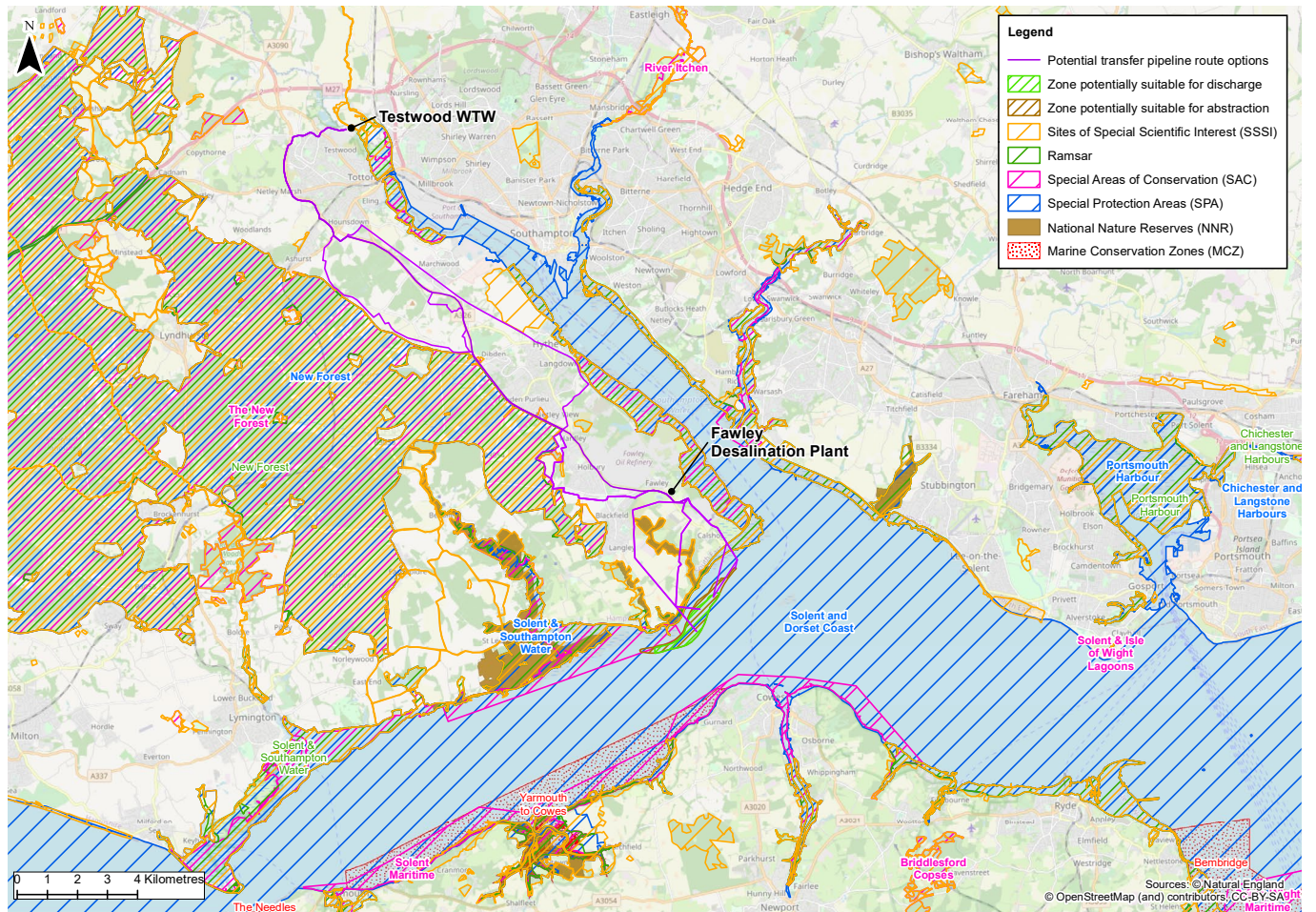


Figure 5: International and national nature conservation designations within the surrounding environment

# Environmental context

## Terrestrial environment

**The terrestrial components of our Base Case, including the desalination plant, its pumping station and transfer pipelines cover a large area with the potential to impact a wide range of receptors.**

The location of the desalination plant, as identified in our WRMP, is at Ashlett Creek in Fawley. This is located within the New Forest National Park which carries a high level of protection under national planning policy to ensure the protection of natural beauty, wildlife and cultural heritage.

The transfer pipelines cross large areas of the New Forest District, which include historic buildings and archaeological designations, rivers and green spaces, as well as residential and business communities who could be affected by our proposals.

The large number of nature conservation designations in the coastal and marine environment is also reflected in the terrestrial environment. For example, the transfer pipeline corridors are bordered closely by the New Forest SSSI and SAC, which supports a number of important habitats such as heaths, mires, grassland and woodland habitats.

A number of these habitats and species are sensitive to potential changes in groundwater and surface water flows. A wide range of protected and priority species also known to be present in the surrounding area, including a range of bats, dormice, and other species. A number of locally important wildlife sites are also present.



# Environmental context

## Terrestrial environment

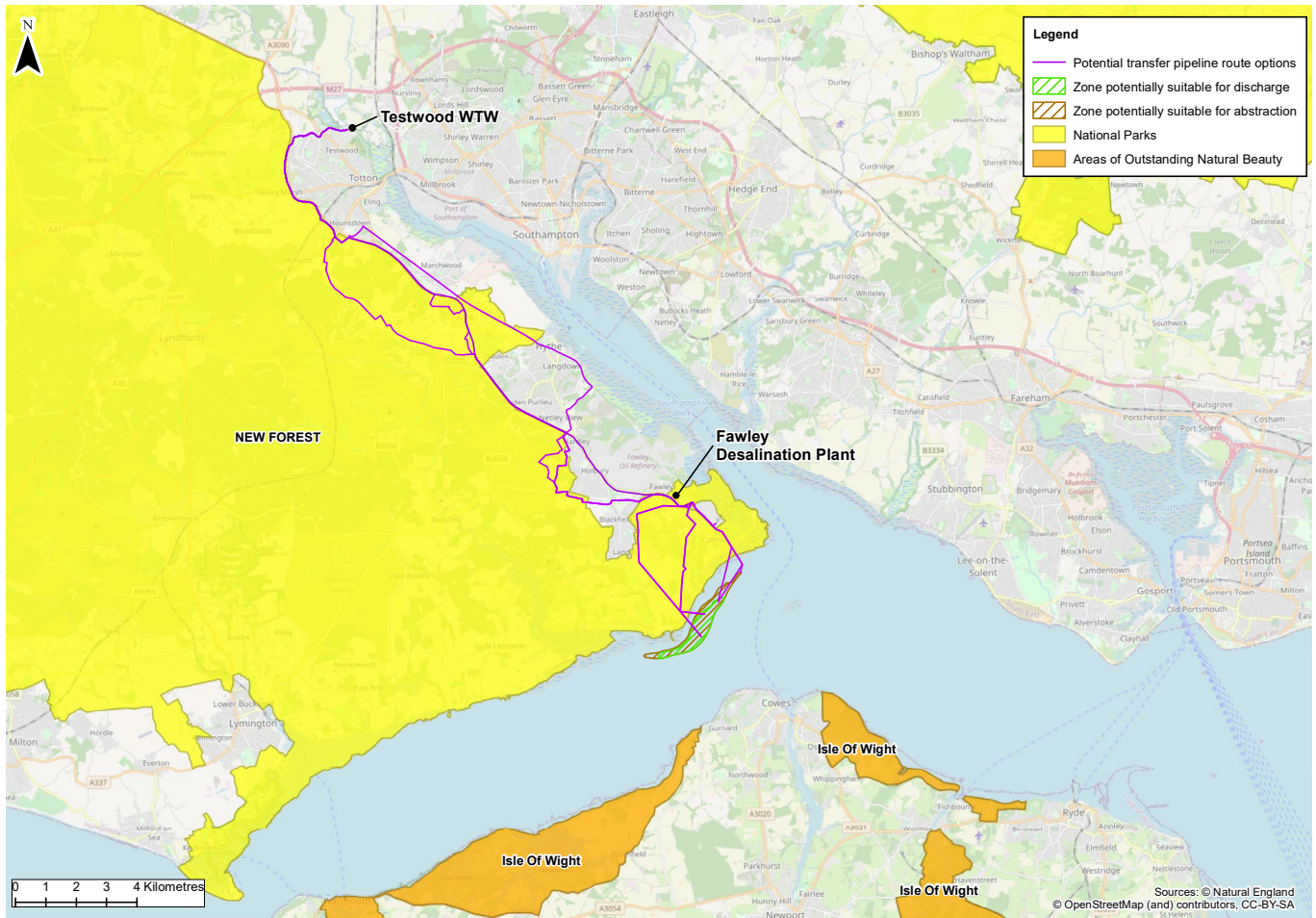


Figure 6: Our proposals are located within a sensitive landscape setting, including the New Forest National Park

# What our proposals mean for you

## Potential impacts

**We recognise that our proposals have the potential to impact local communities and the surrounding environment in a number of ways. Impacts, both beneficial and adverse, may occur during construction and operation and will need to be assessed fully through an Environmental Impact Assessment (EIA) process. Further details on the EIA process are provided on page 36, see ‘Environmental effects’.**

The following sections provide further information on the construction and operational challenges associated with our proposals and how we will seek to identify and manage impacts.

This section describes the challenges and approaches for our Base Case, however many of these challenges would also apply to our back-up solutions. Should our Base Case not be deliverable, we will further explore the specific impacts of these back-up solutions and undertake further consultation.

## Construction

Our construction proposals are still being developed and are at an early stage. However we recognise that construction of our Base Case may cause impacts and disruption to local communities and the surrounding environment. We will explore ways to minimise these impacts as far as possible, through the selection of appropriate construction methodologies, consultation and engagement with local communities, as well as the implementation of other controls or mitigation measures. Mitigation measures will be secured through appropriate planning controls to ensure we deliver the commitments made in our EIA.

We will work with experienced contractors to carefully plan construction activities at all stages of delivery. Below, we have set out some of the approaches we propose to take to address the key construction challenges for this project. We will need

to develop detailed construction methodologies to support our application and will consult more on this in the future.

## Construction challenges

### Traffic management

Traffic management, including road closures may be necessary to enable the excavation and laying of new transfer pipelines to connect the new strategic water source to an appropriate point in the water distribution network. Road closures will be carefully planned in consultation with the relevant local authorities to ensure they are kept to a minimum to reduce the impact on traffic flows and local residents. All traffic management measures will follow the prescribed process and guidance.

We will undertake a construction traffic assessment to consider the traffic which will be generated during the construction phase of the proposed scheme and review the effects on, and measures to minimise, disruption to the local transport network.

We will develop a Construction Traffic Management Plan describing suitable transport routes for construction related traffic along the highway network and detailed plans to include specific access points off the highway to the individual laydown areas. Mitigation measures may include the exploration of alternative delivery routes such as marine transport to reduce the impact on the highway network where possible.

Other large construction projects planned during the same time in the same area, such as the Fawley Waterside Development, will be carefully considered to ensure construction programmes are aligned. Coordination of the projects will help ensure both are delivered without delays and any potential impacts on residents and businesses in the local area can be minimised.

# What our proposals mean for you

## Potential impacts

### Proximity to residential properties

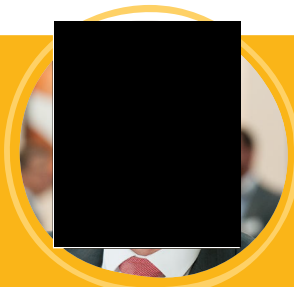
Full consultation with local residents will take place at key stages of the project to ensure any concerns are carefully considered and reflected in the project plans. The project team is developing a dedicated communications strategy, including involving any contractors working on our behalf to make sure residents are properly engaged and understand the detailed proposals. An environmental management and monitoring plan will be developed to ensure disruption caused by construction activities are minimised. Where sensitive receptors, including residential areas, are identified in the area, specific mitigations including the use of alternative construction methodologies and plant / equipment will be implemented to further reduce impacts. All construction works will be limited to specified working hours wherever possible.

### Construction principles

We are committed to minimising the impacts of our proposals through the application of a number of key construction principles.

“We’ll be using a range of best-practice techniques to ensure any disruption is kept to a minimum.”

**Rob Lawless, Senior Project Manager**



### Examples of the types of principles we will explore include:

- Use of best-practice construction techniques
- Using lean construction techniques such as reducing waste by using “just in time”, and closely monitored, deliveries to reduce waste of materials and by maximising the use of recycled materials whilst minimising water and energy consumption
- Maximum use of ultra-low or zero emission plant and vehicles
- Use of the latest technological innovations and alternative approaches to improve safety and reduce the whole life cost of the construction
- Reduce whole life embedded carbon by developing alternative low carbon solutions including new materials and energy efficiency
- Construction works using best-practice management and monitoring techniques leading to high quality value for money construction
- Ensuring that training and skills development are supported, including considering apprenticeships, and ensuring that safety is at the forefront of everybody’s thinking when working on the project
- Using off-site manufacturing where possible, so that packages / plant can be fabricated in a controlled environment remote from the construction site in order to reduce onsite construction impacts
- The project will be managed in accordance with the Considerate Constructors Scheme

# What our proposals mean for you

## Potential impacts

### Environmental effects

Given the scale of the Base Case (and, in the event that one of them is taken forward, the back-up solutions), an Environmental Impact Assessment (EIA) will be required to be carried out to consider the likely significant impacts of the proposals.

We are committed to carrying out a comprehensive EIA which will inform our design as part of an iterative process. The purpose of the EIA process is to help identify the possible likely significant environmental effects of the proposals and identify how those impacts can be avoided, reduced or mitigated.

To support the EIA process, an extensive suite of environmental surveys is proposed to ensure we capture sufficient information on existing baseline conditions. We are planning surveys for our Base Case and back-up solutions to ensure we have robust baseline information for all eventualities.

Our EIA will be supported by a wide range of supporting assessments, including consideration of our proposals under the Water Framework Directive, Habitats Regulations and Environmental Net Gain requirements set out in the draft Water Resources NPS. These assessments will be undertaken with the support of experienced scientists, planning consultants and engineers.

The first stage of the EIA process will be preparation of a Scoping Report during 2021, which will set out the proposed scope and content of our EIA. Further information on how we proposed to identify and manage some of the key impacts of our proposals is presented on the following pages.

### Managing impacts

One of our key aims is to identify and manage any impacts of our proposals through further surveys and investigations, consultation and engagement, iterative design and robust impact assessments. This will enable us to identify appropriate measures to mitigate impacts.

In line with good practice EIA process, we will follow a 'hierarchy' of mitigations whereby we seek to avoid impacts in the first instance. Where impacts cannot be avoided, we will seek to reduce or compensate these as far as practically possible.

In addition to these steps, we are seeking opportunities to incorporate remediation, enhancement and environmental net gain where possible, not just by offsetting but by actually improving the receiving environment.

Our EIA will consider the full range of environmental receptors. The following sections further explore how we are proposing to explore managing impacts across several key environmental receptors.



# What our proposals mean for you

## Potential impacts

### Biodiversity

Our proposals have the potential to affect both designated and non-designated habitats and species. Further work will be undertaken to ensure these are managed appropriately. In particular, we will review our proposals against compliance with the requirements of the Habitats Regulations.

We recognise that development will be required within the sensitive Solent and Dorset Coast Special Protection Area (SPA), combined with potential impacts to habitats and loss of food sources due to abstraction intake and brine wastewater extending across the West Solent. We will also carefully investigate potential disruption of migratory fish using the Solent and Southampton Water to access spawning sites on upstream chalk rivers, due to the abstraction intake and brine release. Further investigations will be undertaken to support this work through modelling of the brine dispersion, refinement of the location and design of the intake and outfall structures and exploration of possible mitigation measures. Potential impacts in terms of temperature and turbidity will also be carefully considered.

Care will be taken to ensure the buried transfer pipelines do not cause severance of surface and groundwater flows that support a number of key habitats and species in the surrounding area. Where the transfer pipelines cross rivers, we propose to horizontally drill beneath these features to minimise impacts to aquatic habitats and flows.

A number of terrestrial and aquatic habitats in the area are sensitive to air quality changes, for example through nitrogen deposition which can cause disruption to the life cycles of animals and plant life. We will need carefully consider emissions from our proposals (e.g. from HGV vehicles or back-up diesel generators) to ensure these impacts are minimised.

Ecological enhancements and biodiversity net gain opportunities will be explored and developed further as our proposals progress, ensuring any identified opportunities are secured through agreements with statutory bodies, local wildlife organisations and interest groups.



Migrating Salmon

# What our proposals mean for you

## Potential impacts

### Historic environment

The construction and operation of water resources infrastructure has the potential to result in adverse impacts on the historic environment above, at and below the surface.

'Historic environment' refers to those elements of the environment that have formed from, or are present as a result of, the interaction between people and their surroundings throughout the past. It includes 'heritage assets' such as historic buildings, elements of landscapes, parks and gardens and archaeological monuments and remains, which people identify and value as contributing to their shared culture and heritage.

### Archaeological and historical context

There are numerous Scheduled Monuments within the surrounding area, including Calshot Castle (a sixteenth century artillery castle), a Scheduled Monument close to Holbury Manor (moated site, fishponds and associated settlement site, 200m west of Holbury Manor), and a Roman road on eastern edge of Beaulieu Heath, 220m north east of Hardley Bridge Ford. Similarly, listed buildings are numerous with a large number at the waterfront in Hythe and in Marchwood. Numerous non-designated heritage assets also exist throughout the area which will also be considered.

The area encompassing the New Forest National Park also has a rich historical past. It was proclaimed a royal forest in 1079 for use as a royal hunting ground and was a naval plantation in the eighteenth century.

The Solent and Southampton Water have also long been recognised as important areas for marine heritage.

Sheltered landing places along the coastline have drawn human populations to the area for millennia and have contributed to the development and prosperity of the region.

There is also the potential for unknown (i.e. undiscovered) archaeology to be present within the terrestrial and marine environment due to the area's rich history.

To further understand the historic environment, we will undertake a number of surveys and investigations including reviews of historic mapping and data, non-intrusive ground-scanning surveys and potentially some excavations at selected locations. Effective ways to promote understanding of the historic environment during development of the project will be identified through the EIA process. This may take the form of talks with local history and archaeology groups or community engagement through local groups and schools.

### Landscape

A detailed Landscape and Visual Impact Assessment will be undertaken to identify the impacts of the proposals on landscape and urban character, valued landscapes and views. Landscape and visual effects also include tranquillity effects, which would affect people's enjoyment of the natural environment and recreational facilities. The impacts on the urban, industrial, rural and coastal characters will be considered with valued landscapes such as the New Forest National Park and maritime seascapes will be given particular consideration.

Good design is key to sustainable development and will be embedded within the project development through site layout and measures relative to existing landscape and historical character and setting.

# What our proposals mean for you

## Potential impacts

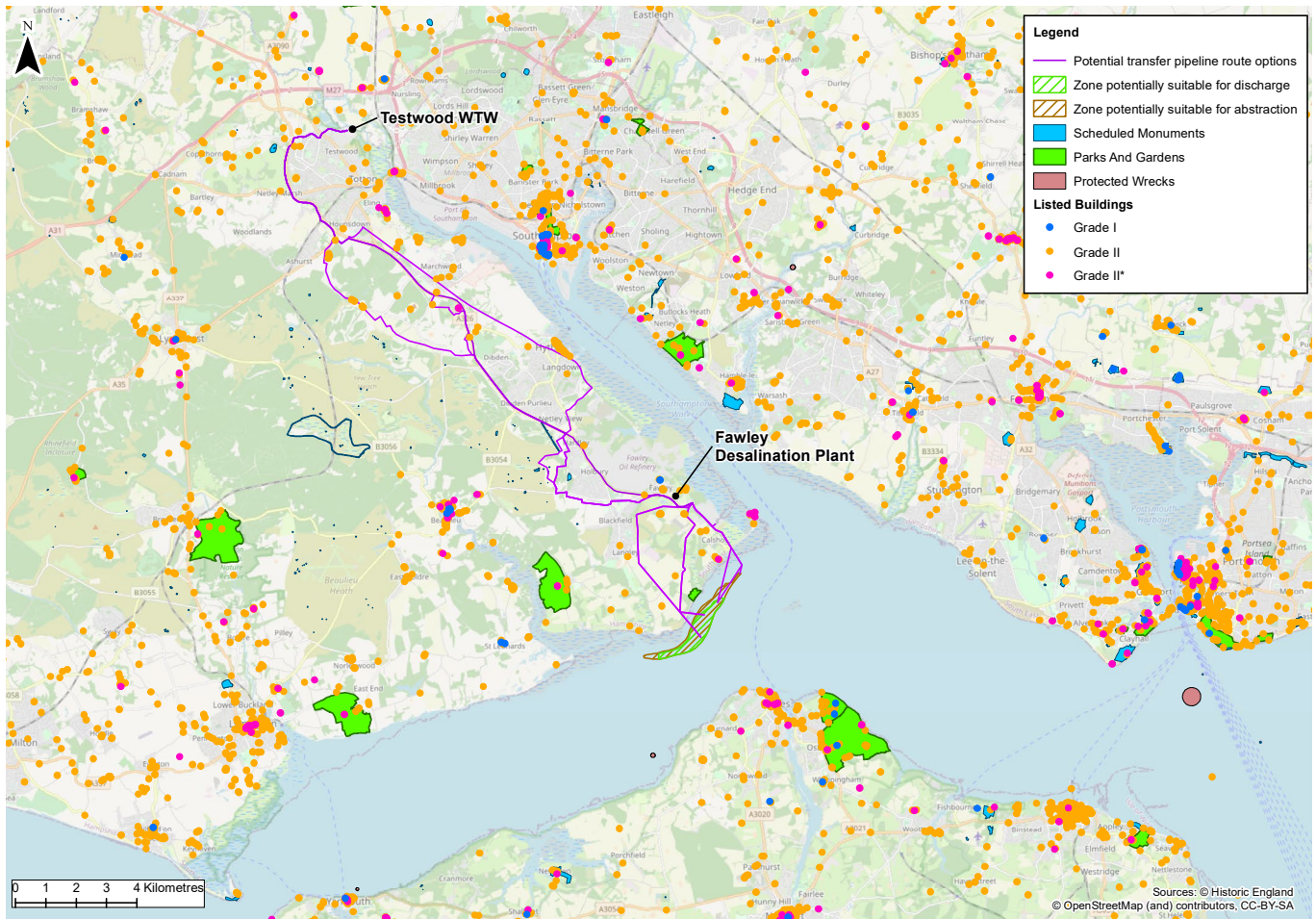


Figure 7: There are number of important heritage features located within the surrounding area

# What our proposals mean for you

## Potential impacts

### Climate change and carbon

Due to the technologies involved, desalination has high energy demands. We are exploring opportunities to reduce energy demands and take into consideration the carbon intensity of the power supply for the desalination plants.

We are also looking at ways to reduce carbon by considering climate impacts at construction and during operation. This will be done through the selection of plant, materials and construction techniques. We will also future-proof our designs by ensuring they are resilient to the impacts of climate change.

### Noise and vibration

If not managed properly, excessive noise and vibration from our proposals could impact people's quality of life and health, use and enjoyment of green spaces and areas with high landscape quality. Noise can also affect terrestrial and marine biodiversity. Noise and vibration impacts may occur through operation of the desalination plant and associated infrastructure and through construction activity, particularly piling and the movement of machinery and vehicles.

Where possible, we will seek to reduce noise emissions at source through design choices, choice of construction plant, timing of construction activities and screening.

An extensive noise survey will be carried out to ensure the assessment is carried out against a representative baseline. Noise and vibration will be assessed in line with all relevant local and national noise policy and in accordance with the relevant guidance documents and British Standards.

### People and communities

Operation of the desalination plant will secure a long-term drinking water supply for local communities in the event of a drought. It will also create job opportunities for local people, particularly during construction. However, construction and operation of our proposals has the potential to cause some disruption to local communities, which we will work hard to keep to a minimum.

The coastal location of the proposed desalination plant, on the edge of the New Forest National Park, and the nature of the surrounding area means that there are several recreational and residential receptors in the surrounding area. These include the Calshot Beach and Lepe Beach which are both designated as bathing beaches. There are Public Rights of Way across Badminton Farm and in the North Solent Nature Reserve where it extends into Dark Water near Blackfield.

### Flood risk and drainage

We will consider both the impacts of our proposals on flood risk and drainage, as well as their susceptibility to flood events. We will also consider the impacts of climate change and coastal change. A Flood Risk Assessment (FRA) will accompany our application to assess this fully. Where possible we will explore sustainable drainage systems, such as wetlands and bioswales, to minimise impacts to fluvial, estuarine, or surface water flood risk.



Lepe beach

# Next steps

## After the consultation

**After the consultation ends, we will publish a report summarising the feedback received and our response. From this, the project team will make recommendations for further development of the scheme, including potential mitigation measures in relation to environment, landscape, water quality, climate change and heritage.**

As the project progresses, further consultation will take place. We will keep you informed on this and further opportunities for you to be involved.

We have not yet confirmed which consenting route we will progress through for the Base Case. However, we are currently considering whether the best option for delivery would be to seek to bring the project into the Development Consent Order (DCO) regime to consider the project as a whole (including marine licenses and other consents required for the project) or to seek consent via conventional planning applications under the Town and Country Planning Act regime, accompanied by relevant marine licence applications for works in the marine environment. This is subject to further investigation and engagement as our proposals are developed further.

The DCO process involves making an application to the Planning Inspectorate (PINs) under the Planning Act 2008

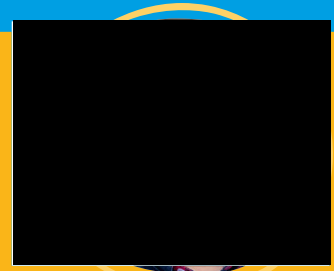
to seek development consent for the proposals. Under this consenting route, the application would be considered by an appointed Examining Authority with the application eventually being determined by the Secretary of State.

The DCO process seeks to deliver a streamlined route for Nationally Significant Infrastructure Projects and was established to provide a faster and fairer process for both communities and applicants. The process puts emphasis on engagement with communities and stakeholders at the pre-application stage to allow for the opportunity to influence a project at an early stage. The DCO process also allows decisions to be made more quickly when compared to traditional consenting routes, which is particularly important for the tight timescales required by our WRMP19 commitments, as set out in the ‘Story so far’ section of this document. Given the importance of the desalination plant at Fawley to meeting the region’s water supply demands, we consider that it could be considered ‘nationally significant’.

Should a DCO be sought, a number of other consents will also be required to ensure compliance with all necessary consenting regimes.

“It’s really important that you share your views with us and help us shape our plans. After all – it’s your water we’re talking about.”

**Nick Eves, Head of Strategic Customer Insight**



# Next steps

## Share your views

This consultation is your opportunity to express your views on our proposed “Base Case” solution and alternative “back-up” options.

We are seeking views on the following elements of the Base Case:

- Options for abstracting water from the Solent
- Information on the desalination plant infrastructure and the ways we are considering managing the cleaned wastewater (brine) removed from the seawater
- The alignment of the underground pipeline, to connect drinking water produced by the project, to our network

We will listen to your views, publish a consultation report and use this to inform the development of the programme.

Further information on the programme and work to date can be found at the following link:

[www.southernwater.co.uk/water-for-life-hampshire](http://www.southernwater.co.uk/water-for-life-hampshire)

Here you'll find a digital copy of this brochure as part of a virtual exhibition that allows users to virtually move around a 360-degree image of an information event and interact with materials including banners, videos and technical documents, as if you are attending an exhibition.

The easiest way for you to send us your feedback is to complete the online feedback form. To request a printed copy of the form and this brochure please write to:

**WATER FOR LIFE – HAMPSHIRE,  
PO BOX 5215**

The address must be written in capital letters and you do not need a stamp.

If you have any further questions or would like to find out more, visit our web pages or contact us by email at [WFLH@southernwater.co.uk](mailto:WFLH@southernwater.co.uk).

Your feedback is important to us in shaping a solution for ensuring future water supply in Hampshire. We will consider all the comments we receive and, where appropriate, use them to help us develop our proposals further.

The deadline for submitting responses to the consultation is 16 April 2021.

# Glossary

<b>Term, abbreviation or acronym</b>	<b>Definition</b>
1-in-200-year .....	A severe drought – the return period of a significant drought and is the design drought year in WRMP19
1-in-500-year .....	An extreme drought
ABE .....	All best endeavours
AONB .....	Area of Outstanding Natural Beauty - an area of countryside in England, Wales or Northern Ireland which has been designated for conservation under the Countryside and Rights of Way Act 2000 to protect, conserve and enhance its natural beauty
AOP .....	Advanced Oxidation Process
Base Case .....	The preferred strategy in WRMP19. Option A.1 (75MI/d desalinated water from Fawley to Testwood WSW)
Catchment .....	The area of region where all water flows to a single point, e.g. for a wastewater catchment, all wastewater flows to a single WTW for treatment
Configuration .....	The structure of each Option (e.g. technology choice, route to deliver water)
COVID-19 .....	Coronavirus Disease
DCO .....	Development Consent Order - a DCO is a statutory instrument (law) that grants consent for a Nationally Significant Infrastructure Project under the terms of the Planning Act 2008. A DCO can combine consent to develop, operate and maintain a project, alongside a range of other approvals that would normally have to be obtained separately, such as listed building consent, deemed marine licence and certain environmental consents. A DCO can also contain powers for the compulsory acquisition and temporary possession of land.
Drought Order .....	Powers granted by the Secretary of State during drought to modify abstraction / discharge arrangements on a temporary basis
Drought Permit .....	An authorisation granted by the Environment Agency under drought conditions, which allows for abstraction / impoundment outside the schedule of existing licences on a temporary basis
EA .....	Environment Agency
EIA .....	Environmental Impact Assessment - the aim of EIA is to protect the environment by ensuring that a relevant authority (local planning authority or Secretary of State) when deciding whether to grant a planning permission or DCO for a project which is likely to have significant effects on the environment does so in the full knowledge of the likely significant effects and takes this into account in the decision making process. EIA also enhances public engagement in the process as consultation on EIA is mandatory.
Fawley Site .....	The site described in WRMP19
Gated Process .....	The formal staged process, run by Ofwat, for specific water companies to investigate solutions and for regulators to review progress and determine how, and if, the solutions will progress.

# Glossary

Groundwater .....	Water held underground in the soil or in voids in rock
HRA .....	Habitats Regulation Assessment - assessment to consider potential effects on designated European sites
MCZ .....	Marine Conservation Zone
MI/d .....	Megalitres (million litres) per day
NE .....	Natural England
NFNP .....	New Forest National Park
NPS .....	National Policy Statement - produced by government under the Planning Act 2008. They comprise the government's objectives for the development of nationally significant infrastructure projects in a particular infrastructure sectors (energy, transport, water, wastewater and waste). There are currently 11 designated NPS, setting out government policy on different types of national infrastructure development. The NPS for water resources is currently in draft form, pending designation by the Government. Applications for DCOs are decided in accordance with the relevant NPS.
NSIP .....	Nationally Significant Infrastructure Project
Ofwat .....	Water Services Regulation Authority - The economic regulator of the water sector in England and Wales
Planning Inspectorate (PINS) .....	The Planning Inspectorate deals with planning appeals, national infrastructure planning applications, examinations of local plans and other planning-related and specialist casework in England and Wales.
Preferred Strategy .....	Final strategy for the Western Area as described in WRMP19 (formerly referred to as Strategy A in draft WRMP19) and is what is required to be delivered by the Section 20 agreement
Programme .....	All activities included within the scope of WfLH
Project .....	Specific activities required to deliver one of the options / solutions / schemes
PW .....	Portsmouth Water
RAPID .....	Regulatory Alliance for Progressing Infrastructure Development - formed to help accelerate the development of new water infrastructure and design future regulatory frameworks. Made up of the three water regulators: Ofwat, Environment Agency and Drinking Water Inspectorate. It was established with the intention of providing a seamless regulatory interface, working with the industry to promote the development of national water resources infrastructure that is in the best interests of water users and the environment.
Routes .....	A number of alternative routes have been identified for the pipeline component for the sub-option and configurations.

# Glossary

s20 .....	Section 20 - the agreement signed by Southern Water and the Environment Agency during the abstraction licence Inquiry in March 2018 under Section 20 of the Water Resources Act 1991.
SAC .....	Special Area of Conservation - land designated under Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora. Important high-quality conservation sites that will make a significant contribution to conserving the habitats and species identified in Annexes I and II, respectively, of the Habitats Directive. The listed habitat types and species are those considered to be most in need of conservation at a European level (excluding birds).
SSSI .....	Site of Special Scientific Interest - an area that is of particular interest to science, most commonly because of its rare plant or animal life.
SPA .....	Special Protection Area - areas classified in accordance with European Council Directive 2009/147/EC on the conservation of wild birds, known as the Birds Directive. SPAs protect rare and vulnerable birds (as listed on Annex I of the Birds Directive), and regularly occurring migratory species.
SW .....	Southern Water
T100 .....	Target 100 water efficiency Initiative
WERF .....	Water Industry Research Foundation
WFD .....	Water Framework Directive - a framework for the protection of inland surface waters, estuaries, coastal waters and groundwater.
WfLH .....	Water for Life Hampshire
WRMP, WRMP19, WRMP24 .....	Water Resource Management Plan - statutory plan setting out how water companies will supply healthy, reliable drinking water to homes and businesses for at least the next 25 years. These plans are published at least every five years. The plan published in 2019 is WRMP19 and the next update will be WRMP24 which is intended to be published in 2023.
WRP .....	Water Recycling Plant - a site whereby wastewater effluent is purified into water that can be reused as a raw water for providing drinking water.
WRSE .....	Water Resources South East, the regional body relevant for Southern Water's operational area.
WSW .....	Water Supply Works - A site whereby raw water is taken from the environment, treated and discharged into the distribution network supplying homes, businesses and industry.
WTW .....	Wastewater Treatment Works - a site where wastewater and sewerage is treated and released back into the environment.





from  
Southern  
Water. 

The graphic element for Southern Water is a stylized white wave icon composed of three horizontal, curved lines of varying lengths, positioned to the right of the word "Water."

## Appendix B: Feedback Form

# Water for Life – Hampshire

## Consultation Feedback Form 2021



**Question 1: Which of the following best describe your interest in the Water for Life – Hampshire programme?**  
(Please tick as many as apply)

- I am a customer whose water supply would be directly impacted by the programme
- I am a resident who lives close to the proposed Base Case option
- I live within the local area of the programme
- I own land within the Water for Life – Hampshire area
- I own or work for a business located within the Water for Life – Hampshire area
- I am a stakeholder from an organisation / group interested in this programme
- I take a general interest in what my water provider is doing
- None of these
- Other – please specify:

### THE BASE CASE

Southern Water has assessed a range of options to find a solution to address water supply shortages in Hampshire.

Based on the evidence of our assessments to date, and building on our Water Resources Management Plan, our proposal (known as the 'Base Case') is to build a 75 Ml/d desalination plant in the Fawley area.

For full details on the Base Case, please review the relevant materials from the consultation brochure.

**Question 2a: To what extent do you agree that the proposed Base Case would be an acceptable solution to the potential future water resource challenges in Hampshire?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

**Question 2b: Please provide any comments in relation to the following areas to support your answer to question 2:**

- Options for abstracting water from the Solent
- Information on the desalination plant infrastructure and the ways we are considering managing the cleaned wastewater (brine) removed from the seawater
- The alignment of the underground pipeline, to connect drinking water produced by the project, to our network

(Please provide as much detail as you can)

**Question 3: Do you have any comments to make in relation to potential impacts of the proposed Base Case?**

These could cover the following areas: water, environmental, energy, traffic and transport and people (health and socio-economic).

(Please provide as much detail as you can)

## ALTERNATIVE OPTIONS

Southern Water have identified alternative options should the 'Base Case' not be delivered.

Desalination alternatives would comprise:

- Configuration A.2: 61 MI/d at Ashlett Creek, near Fawley
- Configuration D.1: 40 MI/d Desalination to industrial use, 30 MI/d Transfer from South West Water and 41 MI/d Water Recycling

For full details on the desalination alternatives, please review the relevant materials from the consultation brochure.

**Question 4a: To what extent do you feel the desalination alternatives would be an acceptable alternative solution, should the Base Case not be delivered, to address potential future water resource challenges in Hampshire?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

**Question 4b: Please provide any comments to support your answer to question 4a**

(Please provide as much detail as you can)

**Question 5: Do you have any comments to make in relation to potential impacts of any of the desalination alternatives listed?**

Comments could cover, but are not limited to, the following areas: water, environmental, energy, traffic and transport and people (health and socio-economic).

(Please provide as much detail as you can)

**Water recycling alternatives would comprise:**

- Configuration B.1: 61 MI/d recycled water from Budds Farm Wastewater Treatment Works to the Lower Itchen
- Configuration B.2: 61 MI/d recycled water from Budds Farm Wastewater Treatment Works to the Upper Itchen/Havant Thicket
- Configuration B.3: 61 MI/d recycled water from Budds Farm Wastewater Treatment Works to Otterbourne Water Supply Works
- Configuration B.4: Up to 61 MI/d recycled water from Budds Farm Wastewater Treatment Works to Otterbourne Water Supply Works via Havant Thicket Reservoir
- Configuration B.5: 75MI/d recycled water from combination of Budds Farm Wastewater Treatment Works and Peel Common Wastewater Treatment Works

For full details on the water recycling alternatives, please review the relevant materials from the consultation brochure.

**Question 6a: To what extent do you feel the water recycling alternatives would be an acceptable alternative solution should the Base Case not be delivered, to address potential future water resource challenges in Hampshire?**

- Strongly agree
- Agree
- Neither acceptable nor disagree
- Disagree
- Strongly disagree
- Don't know

**Question 6b: Please provide any comments to support your answer to question 6a**

(Please provide as much detail as you can)

**Question 7: Do you have any comments to make in relation to potential impacts of any of the water recycling alternatives listed?**

Comments could cover but are not limited to the following areas: water, environmental, energy, traffic and transport and people (health and socio-economic).

(Please provide as much detail as you can)

**Water Transfer alternatives would comprise:**

- Configuration D.2: 75 Ml/d direct raw water transfer from Havant Thicket to Otterbourne

For full details on the water transfer alternatives, please review the relevant materials from the consultation brochure.

**Question 8a: To what extent do you feel the water transfer alternatives would be an acceptable alternative solution, should the Base Case not be delivered, to address potential future water resource challenges in Hampshire?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

**Question 8b: Please provide any comments to support your answer to question 8a**

(Please provide as much detail as you can)

**Question 9: Do you have any comments to make in relation to potential impacts of the water transfer alternatives?**

Comments could cover, but are not limited to, the following areas: water, environmental, energy, traffic and transport and people (health and socio-economic).

(Please provide as much detail as you can)

## FINAL COMMENTS

**Question 10:** Do you have any other comments, thoughts or concerns about the Water for Life – Hampshire programme of proposed options you have provided feedback on?

(Please provide as much detail as you can)

**Question 11a:** How did you hear about this consultation?

- Received a letter / email
- Newspaper
- Social media
- Local authority / newsletter or mailing list
- Family / friends
- Other source

**Question 11b:** Do you have any feedback on this consultation – eg level of information provided, advertising etc?

(Please provide as much detail as you can)

## ABOUT YOU

**Question 12:** Solely for analysis purposes, please could you provide the first section of your postcode?

**Question 13:** If you would like to receive a notification when future stages of public consultation on the Water for Life – Hampshire programme start, please enter your details including your email below:

Email address (required):

Name (required):

Telephone number (optional):

Organisation (optional):

- Please tick this box if you are happy for Southern Water to use the contact details you have provided in this survey.

Please use the box below if you have any further comments you would like to make.

**Thank you for providing feedback on the Water for Life – Hampshire proposals – your time is very much appreciated.**

**Data Protection:** In accordance with the GDPR, Southern Water will securely store your email address on our servers for this purpose for up to 2 years. You have the right to withdraw your consent to this at any time. By providing your email address here, we confirm, we will not contact you about anything other than consultation projects; though you may be contacted by us as a customer if you have given permissions to use your email address on your account. Should you have any concerns or wish to withdraw your consent, please contact Southern Water by using the email address [WFLH@southernwater.co.uk](mailto:WFLH@southernwater.co.uk) or you can contact the Southern Water Insight Team on 07884 220 825. In due course, the information provided in response to this consultation will be used in a Consultation Report as part of a consenting application to the Planning Inspectorate (PINS), as an executive agency of UK Government. The PINS privacy statement is available to view here: <https://infrastructure.planninginspectorate.gov.uk/help/privacy-notice/>

## Appendix C: List of Stakeholders

### Statutory consultees

Prescribed and Statutory Consultees	
Cranborne Chase AONB	The office of road and rail
Chichester Harbour AoNB	Dorset AoNB
Isle of White AoNB	North Wessex Downs AoNB
Surrey Hills AoNB	Civil Aviation Authority
Canal and River Trust	Transport Focus
Local Authorities	Hampshire Fire and Rescue Authority
Parish Councils	Hampshire County Council - Highways
Natural England	The Environment Agency (drainage)
Public Health England	Hampshire Prepared Local Resilience Forum
The Coal Authority	Hampshire Police and Crime Commissioner
The Crown Estate	Hampshire Search and Rescue
The Disabled Persons Transport Advisory Committee	Highways England
The Environment Agency	The Environment Agency (waste)
The Equality and Human Rights Commission	Ofwat
The Forestry Commission	Trinity House
Historic England	Secretary of State for Business, Energy and Industrial Strategy
Homes England	Neighbourhood Forums tbc
Joint Nature Conservation Committee	Hampshire County Council (LLFA)
MMO	Secretary of State for Business, Energy and Industrial Strategy
The Maritime and Coastguard Agency	DEFRA
The office of Nuclear Regulation (the ONR)	The relevant public gas transporter(s)
The relevant electricity distributor(s) with CPO Powers	Highways England Historical Railways Estate
Ministry of Defence	National Rail Infrastructure Ltd
The National Health Service commissioning board	NHS West Hampshire Clinical Commissioning Group
The relevant water and sewage undertaker(s)	Consumer Council for Water
The Food Standards Agency	Associated British Ports
Southern Inshore fisheries and conservation authority	OFGEM
Health and Safety Executive	Network Rail
Royal Mail Group	
Local authorities within WfL:H Western Area	
Hampshire County Council	Dorset County Council

Wiltshire County Council;	<b>West Sussex County Council</b>
New Forest National Park Authority;	Gosport Borough Council
Southampton City Council;	Fareham Borough Council
Isle of Wight Council;	Bournemouth, Christchurch and Poole Council
Eastleigh Borough Council;	<b>Havant Borough Council</b>
Test Valley Borough Council;	Portsmouth City Council
Winchester City Council;	<b>East Hampshire District Council</b>
Basingstoke and Dean District Council.	Arun District Council
Waverley Borough Council	South Downs National Park Authority
New Forest District Council	Surrey County Council
Chichester District Council	
Parish Councils	
Fawley Parish Council	Hordle Parish Council
Ashurst & Colbury Parish Council	Hyde Parish Council
Beaulieu Parish Council	Hythe & Dibden Parish Council
Boldre Parish Council	Lymington & Pennington Town Council
Bramshaw Parish Council	Lyndhurst Parish Council
Bransgore Parish Council	Marchwood Parish Council
Breamore Parish Council	Martin Parish Council
Brockenhurst Parish Council	Milford-on-Sea Parish Council
Burley Parish Council	Minstead Parish Council
Copythorne Parish Council	Netley Marsh Parish Council
Damerham Parish Council	New Milton Town Council
Denny Lodge Parish Council	Ringwood Town Council
East Boldre Parish Council	Rockbourne Parish Council
Ellingham, Harbridge & Ibsley Parish Council	Sandleheath Parish Council
Exbury & Lepe Parish Council	Sopley Parish Council
Fordingbridge Town Council	Sway Parish Council
Godshill Parish Council	Totton & Eling Town Council
Hale Parish Council	Whitsbury Parish Council
Woodgreen Parish Council	

### Non-statutory Consultees

Potential users, interest groups and local community groups	
Hampshire and IoW Wildlife Trust	Drinking Water Inspectorate
Wessex Chalk Stream and Rivers Trust	Solent Forum
Test and Itchen Association	RAPID (Ofwat, EA, DWI)
Salmon and Trout Conservation	Influencers
Angling Trust	<b>Local MPs</b>
Countryside Landowners Association	Politicians within the Western Area Local Authorities
Hampshire Ornithological Society	Water Resources South East

RSPB	West Country Water Resources
CPRE Hampshire	Regional groups (where applicable)
Upper Itchen Initiative	Water supplier affected by supply System
Bourne Rivulet Group	Any water companies with bulk supply or shared resource agreements with
English Heritage	Neighbouring water companies
Sustrans	Customer challenge groups or their equivalent
The Woodland Trust	Any other groups the development is likely to affect
National Trust	Any potential water supplier, company or third party Southern Water may wish to trade with
Local catchment partnerships	National Infrastructure Commission (PINS)
Water UK	Local Nature Partnerships (where applicable)
Water retailers for business	Any companies that Southern Water has an agreement with such as a NAV or water retailers
Hampshire Chamber of Commerce	Solent LEP
Partnership for Urban South Hampshire	National Farmers' Union
Senior Steering Group, Regional Co-ordination group and modelling advisory group established as part of the National Framework for Water Resources	

## Appendix D: Press Release

Water for Life – Hampshire  
Launch of non-statutory public consultation press release  
February 8, 2021

### **Southern Water unveils major plans to help keep Hampshire’s rivers and taps flowing**

Southern Water is consulting on plans to pump hundreds of millions of pounds into Hampshire and the Isle of Wight to help keep rivers and taps flowing during a drought.

The company’s *Water for Life – Hampshire* programme will revolutionise the way it sources, treats and supplies water across Hampshire and the Isle of Wight over the next decade.

Due to the Covid-19 pandemic, the company is adopting a “digital first” approach to its consultation and has launched a virtual room online where people can interact with films, animations, information boards and a brochure detailing the programme and the opportunities to help shape the plans.

The virtual room can be reached via [www.southernwater.co.uk/water-for-life-hampshire](http://www.southernwater.co.uk/water-for-life-hampshire)

The company is seeking planning consent for its central plan – a desalination plant in the Fawley area which will produce up to 75 million litres of water per day that will be used to supply water to the Hampshire region during periods of drought.

The consultation also outlines the alternatives the company is exploring as a back-up in case desalination proves undeliverable – ensuring customers’ supplies are maintained.

If one of the alternatives is developed in the future, it would be subject to further development and consultation on that proposal. These include alternative sizes of desalination plant, different configurations of water recycling plants and a possible additional bulk transfer of water from the proposed Havant Thicket Reservoir, which Southern Water is co-developing with Portsmouth Water.

As part of its wider *Water for Life – Hampshire* programme, Southern Water is also:

- Planning to install up to 125km of new water mains to link up its key sites and bring in supplies from neighbouring companies as well as building additional storage
- Reducing leakage (by 15% by 2025, 40% by 2040 and 50% by 2050)
- Increasing water efficiency by supporting and incentivising people to reduce their use to 100 litres a day (from an average of 129) by 2040
- Improving environmental resilience and water quality by working with farmers, businesses and environmental groups to protect and restore local water sources

Ian McAulay, Southern Water CEO, said: “Water is a precious, and increasingly scarce, resource and we all need to take steps to protect and preserve it.

“*Water for Life – Hampshire* is our commitment to go to even greater lengths to strike the balance between protecting the environment and serving a growing population.

“It’s also a fantastic opportunity for us to work with environmental groups, local authorities, industry, land owners and others to deliver our stated vision of “Delivering a resilient Water Future for the South East” and, in particular, Hampshire and the Isle of Wight.

“This wide-ranging programme is the first of its kind in the UK and gives us an opportunity to help redefine how we think about water in a more holistic and sustainable way and create examples for the future.



“The result will be a resilient supply of water for customers and the environment, whatever the weather.”

The improvements will secure future water supplies for customers and help protect two of the county’s major rivers – the Test and the Itchen.

These rivers are among the finest examples of chalk streams in the world – rare ecosystems that support an abundance of wildlife such as salmon, trout, crayfish and dragonflies.

The Test and Itchen, and their associated underground aquifers, are also the main source of water for more than 700,000 people as well as being a source for a number of private abstractions.

*Water for Life – Hampshire* is Southern Water’s pledge to take significantly less water from the rivers to further protect wildlife during dry weather and drought – a commitment that leaves the company with a shortfall of up to 190 million litres of water a day during a 1-in-200 year drought.

Southern Water’s current Water Resources Management Plan (WRMP) plans to make up this shortfall by 2027 and the company is investing hundreds of millions of pounds to ensure it continues to protect the environment while securing reliable, wholesome water for its customers.

It is also planning for further expected reductions which, during a drought, could lead an increased loss of water required to supply Hampshire and the Isle of Wight.

Southern Water is continuing to develop its plans for a desalination plant in the Solent, as outlined in its WRMP and is in the process of preparing its application for planning consent.

The company is engaging with local authorities and landowners on the plans and working to find a suitable site for the facility, which will be capable of supplying up to 75 million litres of water a day.

Southern Water is working hard to address the shortfall in Hampshire between now and 2027.

In the meantime, the area will be at risk of water shortages and the company may need to apply for drought permits or drought orders to ensure customers’ supplies are maintained.

Drought permits and drought orders allow the company to continue to take water during dry weather but mean restrictions on use, previously managed under hosepipe bans, may be needed.

To offset the potential environmental impact of drought permits and drought orders, Southern Water has embarked on a £9.5 million suite of environmental monitoring and improvement projects that are being developed and delivered by local environmental organisations.

Activities already agreed include:

- Monitoring of wildlife including fish, breeding birds and Southern Damselfly
- Working with Bristol Zoo to breed White Clawed Crayfish for wild release
- Restoring rivers to more natural states by removing man-made barriers

To find out more about the programme and engage in the online consultation, visit [www.southernwater.co.uk/water-for-life-hampshire](http://www.southernwater.co.uk/water-for-life-hampshire)

If you are unable to access the website, please write to *Water for Life – Hampshire*, PO Box 5215 (no stamp required) to request a written copy, or large print version, of the consultation brochure and feedback form.

Ends

**Notes to Editors:**

The consultation starts on February 8 and runs for six weeks, until March 23. All responses must be sent by midnight on March 23.

The major infrastructure projects in the *Water for Life – Hampshire* programme are being overseen by an advisory board comprising the main water industry regulators - Ofwat, the Environment Agency and the Drinking Water Inspectorate.

The group, called the Regulators' Alliance for Progressing Infrastructure Development (RAPID) is being advised by Natural England.

RAPID is overseeing the development of strategic water resources projects for several water companies across the country to help them identify and develop the optimal regional and inter-regional solutions.

**Contact:** Southern Water team – [mediateam@southernwater.co.uk](mailto:mediateam@southernwater.co.uk)

The Planning Inspectorate  
c/o QUADIENT  
60 Buckingham Avenue  
Slough  
SL1 4PN

09 June 2026

Via email to: [HampshireWaterProject@planninginspectorate.gov.uk](mailto:HampshireWaterProject@planninginspectorate.gov.uk)

For the attention of: **Hampshire Water Project (HWTWRP) Team**

F.A.O. Mr Matthew Sheard, Planning Inspectorate Case Manager

Dear Mr Sheard,

## **Hampshire Water Transfer and Water Recycling Project (HWTWRP)**

### **Submission by Rowlands Castle Parish Council on the Adequacy of Pre-Application Consultation**

#### **Statutory Framework for Acceptance**

**Under section 55(3)(e) of the Planning Act 2008, the application from Southern Water may only be accepted if the applicant has complied with the pre-application procedures required by the Act.** Under section 55(4), the Planning Inspectorate must, when deciding that question, have regard to Southern Water's Adequacy of Consultation Milestone report, October 2025 ("**Southern Water AoCM report**") and any adequacy of consultation representations.

This is the formal submission of Rowlands Castle Parish Council ("**RCPC**"), **the council in whose area half of the Havant Thicket Reservoir is located, and whose residents will receive recycled water from the reservoir as part of their drinking water supply.**

RCPC submits that **the application should not be accepted for examination because Southern Water did not comply with its consultation duties under sections 42, 47 and 48 of the Planning Act 2008.** Your AoCR Proforma confirming our opinion is enclosed.

Given the Planning Inspectorate's acceptance<sup>1</sup> that the requirements of the Planning Act must be **interpreted in line with the common law duty of fair consultation**, RCPC also submits that neither the council nor its residents were consulted in accordance with the **Gunning Principles**. In particular, RCPC and its residents should have been adequately consulted at a '**formative stage**', they should have been adequately consulted as '**persons likely to be affected**' and Southern Water should have given '**proper consideration**' to the responses received.

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<sup>1</sup> e.g. Note that in respect of the recent **Norwich to Tilbury DCO Acceptance** even the applicant accepted, in a series of **King's Counsel** opinions (2022-25), **the applicability** of the **Gunning Principles** (see: Planning Inspectorate's portal, Norwich to Tilbury, Document 5.1, Consultation Report – Appendix N: Legal Opinions).

RCPC submits that **neither the council nor its residents were adequately consulted** by Southern Water on the HWTWRP. The attached Inadequacy of Consultation Report prepared by our Technical Advisor (“**Inadequacy Report**”) sets out in detail why, in RCPC’s view, **Southern Water’s consultation did not satisfy the requirements relevant to Acceptance under the Planning Act 2008**.

## Material Change and Why It Matters at Acceptance

**The use of Havant Thicket Reservoir – as a core part of Southern Water’s HWTWRP proposal to store recycled effluent - represents a material change from the existing spring-fed reservoir permission.** The existing planning permission granted by East Hants District Council and Havant Borough Council for the Havant Thicket Reservoir only permits it to be filled with spring water. The DCO application for the HWTWRP would include granting permission to discharge recycled effluent into the reservoir. Whether RCPC (and our residents) were properly consulted is therefore a key issue for the Acceptance stage.

**The accompanying Inadequacy Report demonstrates that Southern Water did not comply with the consultation requirements relevant to Acceptance under the Planning Act 2008 and the Gunning Principles.** A summary of the concerns, cross-referenced to the relevant sections, is set out in the first 3 pages of the Inadequacy Report.

## Key Grounds of Inadequate Consultation

RCPC relies on the following **four principal grounds of inadequate consultation** under sections 42, 47 and 48 **of the Planning Act 2008 (PA)** and under **the Gunning Principles**<sup>2</sup>:

- 1. Failure to consult ahead of Southern Water selecting the HWTWRP in December 2021** (the Inadequacy Report, sections 1, 2 and 3.1, and Appendix A). This was a completely new supply option not included in Southern Water’s WRMP19, which would fundamentally change the nature of the water being used to fill the Havant Thicket Reservoir and fundamentally change the source of drinking water for the community served by Portsmouth Water, including RCPC residents (i.e. ‘*persons likely to be affected*’). Neither RCPC, in whose area the reservoir is located, nor the residents to be supplied by the reservoir, were consulted prior to the decision in 2021 (i.e. the ‘*formative stage*’). **That defect was not remedied by the later consultations, including the statutory consultations, because by then Southern Water had already selected the HWTWRP and there was no longer any meaningful opportunity to influence the strategic direction of the project at a *formative stage*.**
- 2. Failure to consult on alternative options before selecting the HWTWRP** (including an alternative environmental buffer lake and/or different effluent recycling options) **and failure to provide any meaningful opportunity to comment on the selection of the HWTWRP before that decision was taken, both in breach of Planning Act and the Gunning Principles.** The later consultations did not cure the earlier defect (i.e. improper consultation at the *formative stage*), because they proceeded on the basis that the HWTWRP had already been selected rather than on whether the HWTWRP should be selected at all (the Inadequacy Report, page 14 and sections 3.2d, 3.4c and 8.2). This is evidenced by the following:

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<sup>2</sup> In addition, and as an aid to the proper construction of the PA, the operation of the Water Industry Act 1991 (WIA section 37 A to C) reinforces the Gunning Principles’ requirement that Southern Water’s proposal should have been at a *formative stage* and that the proposal should have been properly brought to the attention of RCPC and to other persons *likely to be affected*.

- the first public consultation specifically on the HWTWRP did not take place until July 2022, six months after Southern Water selected the HWTWRP in December 2021;
  - consultation on the first draft WRMP24, which sought to justify that selection, was not undertaken or published until November 2022, a year after the decision had already been made.
3. **Failure to take account of sustained public objection and to address concerns raised across the later consultations.** Once Southern Water began consulting specifically on the HWTWRP, there was continuing and significant objection to the proposed use of Havant Thicket Reservoir for recycled effluent, to the environmental and water-quality implications, and to the adequacy of the option-selection process. The Inadequacy Report, sections 5 and 3.4, demonstrates that the product of the consultation was not conscientiously considered by Southern Water; instead, Southern Water proceeded on the basis of a pre-selected option rather than meaningfully reconsidering whether the HWTWRP should be selected at all. The Inadequacy Report points to significant evidence that **Southern Water failed in its duty to give proper consideration** to the objections it received – probably because it had already made the decision to implement the HWTWRP (including the repurposing of the Havant Thicket Reservoir) ahead of such consultation.
4. **Failure to be open and transparent throughout the consultation process.** This was not confined to one consultation round. Across the 2021, 2022, 2024 and 2025 consultations, Southern Water **failed clearly and consistently to explain the practical consequences** of the HWTWRP (including the repurposing of the Havant Thicket Reservoir) for those *likely to be affected*, including those Portsmouth Water customers (such as RCPC residents) who would in future receive recycled water from the repurposed reservoir. Under the **Gunning Principles**, as supported by the Local Government Association and the government’s Consultation Principles, consultees have to be given **sufficient information** to enable them to give intelligent consideration to the proposals. A consultation process that required consultees to piece together the consequences from technical material was not transparent and did not provide sufficient information (the Inadequacy Report, page 13 and section 6.4, and section 6 more generally).

**These above four points are all Acceptance issues.** In our submission, **the application should not be accepted for examination under section 55 of the Planning Act 2008.** Some of the key stakeholders most affected by the HWTWRP were deprived of any meaningful opportunity to be consulted, including on the substance of the change from a spring-fed reservoir to one intended to store water comprising recycled effluent and spring water. Nor did the later consultations cure that defect: sustained objection was not conscientiously considered by Southern Water and the consultation materials still failed clearly and consistently to explain the practical consequences of the HWTWRP, including which customers would receive the recycled water at their taps (such as RCPC residents).

## Chronology

As mentioned, the first **consultation on the applicant’s Water Resources Management Plan which selected the HWTWRP as an option did not take place until November 2022, a year after the option had already been selected by Southern Water.** By then it was too late to influence the option selection; Southern Water had already progressed the design for the

HWTWRP. Therefore, the consultations did not provide a meaningful opportunity to influence a decision that had already been made. Documents important to understanding the options appraisal process for WRMP24, options that were not selected but could be viable, and potential environmental impacts were all marked 'restricted' at the time of the consultation and, as a result, were not readily accessible to the public (the Inadequacy Report, section 3.2j). Other water companies did make such documents available for their equivalent WRMP consultations. It is now clear that not all alternatives were adequately investigated and considered, with even the Regulators pushing throughout the period from 2021 to date for more robust options assessment. This was confirmed through meetings with senior RAPID officers from the EA and Ofwat. The Regulators concerns about the options evaluation were hidden out of public sight in documents Southern Water classified as restricted (the Inadequacy Report, section 6.3, last bullet)

## Failure to consult on Optioneering

Southern Water's own 2021 consultation materials made clear that they were not consulting on selecting the HWTWRP. The consultation brochure stated: "*At this stage, we are not consulting on a 'choice' between the Base Case [the Fawley desalination plant] and the alternative solutions*" (of which there were 8) and that, if the Base Case proved undeliverable, "***we will undertake further consultation on our alternative solutions.***" The Southern Water 2021 consultation feedback report then confirmed that "*the scope of consultation was to consult on the Base Case and it was not an options appraisal consultation where consultees were asked to select a preferred option*".

Despite Southern Water's specific written assurance that there would be further consultation on the potential alternatives if the Base Case failed, it is a fact that there was no further public consultation between the February 2021 consultation and the decision by Southern Water to select the HWTWRP in December 2021.

Local authorities and regulators who responded to the February 2021 consultation indicated that it did not include enough information on the backup options to Fawley desalination, or environmental information to be able to make an informed assessment, or provide substantial comments (Inadequacy Report Appendix C, item 2 & SW 2021 feedback report page 22 & 23)

## Failure to Consult RCPC and other Persons Likely to Be Affected

Southern Water's 2021 consultation feedback report also confirms that RCPC was not identified in the report as a parish council consultee or respondent: under section 3.3.3, Southern Water records that "*One parish council response was received from Fawley Parish Council,*" and Appendix C lists at least 35 parish councils consulted but not RCPC. Evidently, therefore, **RCPC was not consulted, even though half of the planned reservoir that would be used for the HWTWRP lies within its parish boundary and its residents clearly fitted within the 'likely to be affected' designation.** The **same Southern Water report records** that the consultation was conducted on a "digital-first (online) approach", that "**face to face public events were not held**", there were **no physical deposit locations during the consultation period**, and there were **no notices posted** at the entrances to the popular recreational area where the planned reservoir is to be located to advise site users of the consultation. The one press release issued by Southern Water did not mention the scheme for effluent recycling via the Havant Thicket reservoir. In those circumstances, the failure to provide RCPC with the 2021 consultation document meant that RCPC had no meaningful opportunity to understand, consider or respond to the possible use of Havant Thicket Reservoir for recycled water before Southern Water selected the HWTWRP. If we had been consulted before Southern Water finalised its selection, RCPC would have raised substantial concerns as we subsequently did (RCPC submission to Ofwat April 2022) after the

selection was made; adding to the cacophony of dissent to which Southern Water failed to give 'proper consideration' which is picked up elsewhere in this letter.

For context: the Inspectorate should note that the communities of Fawley, New Forest & Southampton waterside had years to consider and raise concerns regarding the Fawley desalination scheme (which was abandoned by Southern Water in December 2021 in favour of the HWTWRP) over a number of consultations; they were even given an extension of the deadline in 2021 to comment (the Southern Water 2021 consultation feedback report, page 52). About 35 of their parish councils, which could be impacted by the desalination scheme, were sent the 2021 consultation document.

**Put simply: by not including RCPC as a consultee and not sending it the 2021 consultation documents, Southern Water failed to adequately consult RCPC in breach of the Planning Act 2008 and the Gunning Principles – even though the reservoir was within its parish and its community was affected by the proposal. RCPC was not given any opportunity to comment at the formative stage of the plan before Southern Water changed its selected option from Fawley desalination to the HWTWRP.**

**The Planning Inspectorate should also note that, as well as RCPC, Southern Water failed to consult the parish councils of Horndean and Clanfield.** The residents of all three parishes will receive the recycled water from the reservoir and use the reservoir site area for recreation. Southern Water demonstrably failed to discharge its consultation duties under sections 42, 47 and 48 of the Planning Act 2008.

### **Inadequate Information and Lack of Meaningful Opportunity to Comment**

The first consultation on the HWTWRP did not take place until July 2022, which was **6 months after the decision had already been taken by Southern Water to proceed with the HWTWRP**. In both 2022 and 2024 the overview map and consultation brochure text failed to show that Portsmouth Water customers (including RCPC residents) would be impacted because they would receive the recycled water from the reservoir if the HWTWRP went ahead (the Inadequacy Report, page 13 and section 6.4). Therefore, Southern Water failed to ensure the consultation materials were 'sufficient to give intelligent consideration of the plan' (the Inadequacy Report, section 3.2). Moreover, notices/posters were not even put up at the Havant Thicket Reservoir site entrances within the parish in 2022 to make people who use the popular site aware of the consultation.

Public exhibitions/drop-in events and the deposit of consultation materials in a public building did not happen within the parish, even though Portsmouth Water had previously used the Parish Hall for its drop-in events for the original reservoir planning application. No information was provided by mail to drinking water customers who would be impacted, not even with routine bills, to draw attention to the HWTWRP and the consultation for those who would be affected. The majority of respondents (75%) to the 2022 consultation did not think it had been well promoted, with 56% indicating the promotion was poor or very poor. In March 2022 **Ofwat even imposed a penalty on Southern Water for insufficient stakeholder engagement, particularly highlighting the lack of engagement with customers who would receive the recycled water** (Inadequacy Report page 11). Both the lack of targeting to this group in the July 2022 consultation and the failure to set up an effluent recycling stakeholder group when requested in 2022 and 2023 is very concerning and shows Southern Water's lack of interest in really engaging with customers. They seemingly did not want them to have a chance of raising real concerns about the HWTWRP.

As already explained, the 2022 **and later 2024 consultations** proceeded on the basis that the HWTWRP had already been selected and focused largely on matters of detail for implementing the project. As a result, there was no meaningful opportunity for RCPC or affected residents to comment, at a formative stage, on the selection of the HW TWRP before it was presented in later consultations as the settled option.

**Nor was the original failure made good by the later consultations, including the statutory consultations.** By the time RCPC was first made aware of the HWTWRP in 2022, Southern Water had already selected the scheme in December 2021. The later consultations therefore did not provide a meaningful opportunity to influence whether the HWTWRP should be selected at all; instead, they proceeded on the basis of a settled option and focused largely on where new infrastructure would be located and how the project would be taken forward. In any event, those later consultations still failed clearly to identify that Portsmouth Water customers, including RCPC residents, would receive recycled water from the reservoir. For those reasons, the later consultations did not remedy the original failure to consult RCPC and other affected persons at a formative stage.

The majority of residents (drinking water customers) in the east/south of Hampshire and in West Sussex will still be completely in the dark about this significant planned change to their drinking water supply, as Southern Water has made no attempt to notify its customers directly about the change from natural sources of water, nor to advise them about the consultations. Yet early engagement with the community is identified as critical to the success of effluent recycling schemes in many international case studies.

By the time of the first July 2022 public consultation on the HWTWRP that RCPC was made aware of, it was too late to influence the selection of the scheme, because the scheme **had already been selected by Southern Water 6 months earlier, with no opportunity to change or influence that decision available.** It is important to note that:

- 48% of respondents did not support the HWTWRP (rising to 68% in the 2024 consultation).
- 46% of respondents did not support the Southern Water options appraisal process.

Yet this clear public feedback has not been adequately taken into account because the option was already pre-selected.

Even when Southern Water was required to review options in 2024 following a request by Defra, it only reviewed the options already in the draft plan; this did not address the concern about not having adequately considered more sustainable options (the Inadequacy Report Section 3.4c).

## Public Response and S. Water's Adequacy of Consultation Milestone

While the Southern Water AoCM report does set out details of the consultations that have taken place, it is less than transparent as to how timely and meaningful those consultations have been and, in our view, misrepresents the adequacy of the consultation. The concerns about this 'milestone' report are summarised in Section 8.1 of the Inadequacy Report.

Appendix A of this letter sets out some of the key facts, roughly in a timeline, that help to demonstrate that the Southern Water consultation process has not been adequate, and that there should have been an earlier phase of consultation before the HWTWRP was selected.

## Summary and Position on Acceptance

The issue is not whether RCPC was omitted from every later consultation round. The issue is that the original failure to consult RCPC before Southern Water selected the HWTWRP in December 2021 was never made good so that we could comment. By the time RCPC were made aware of, or was included in, later consultations, the strategic choice had already been made and the subsequent consultations did not provide any meaningful opportunity to influence whether the HWTWRP should be selected at all. Nor did the later consultations cure the further defects identified in this letter; sustained objection was not conscientiously considered by Southern Water in any way that reopened the strategic choice. Furthermore, the consultation materials still failed clearly and consistently to explain the practical consequences of the HWTWRP, including which customers would receive the recycled water at their taps, such as RCPC residents.

**For the purposes of Acceptance, the relevant statutory question is whether Southern Water complied with the pre-application consultation requirements under the Planning Act 2008, in particular sections 42, 47 and 48, as required by section 55.** As we have explained<sup>3</sup>, the Planning Inspectorate must also apply the **Gunning Principles** as part of its determination as to whether the Acceptance test has been satisfied. **In RCPC's view, Southern Water has not discharged its consultation duties under these provisions<sup>4</sup>.**

**RCPC urges you to consider the points raised in this letter and Appendix A, together with the evidence set out in the Inadequacy Report that accompanies this letter, when deciding whether the application demonstrates adequate pre-application consultation for the purposes of Acceptance. In RCPC's view, the evidence shows that it does not. For the reasons explained in the letter, RCPC submits that the application does not satisfy section 55 of the Planning Act 2008, because Southern Water did not comply with the applicable pre-application consultation requirements. The application should therefore not be accepted for examination.**

If you would like clarification, additional source documents, or other information in order for us to substantiate RCPC's submission, please do not hesitate to contact me.

Yours sincerely



Chairman Rowlands Castle Parish Council

Attached: Appendix A - Key Facts set out roughly in a timeline

Enclosed:

1. Inadequacy of Consultation Report - by RCPC Technical Advisor.
2. Southern Water 2021 consultation feedback report, which includes the 2021 consultation brochure as an appendix.

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<sup>3</sup> See footnote 1.

<sup>4</sup> NOTE: If the Planning Inspectorate were to determine that the equivalent provisions of the WIA section 37A to C are applicable, or are an aid to its construction of Southern Water's duties under the Planning Act, then we would submit that Southern Water has not discharged those other statutory duties either – e.g. at no time has it consulted Portsmouth Water's customers (many of whom live within the Rowland's Caste area) who are 'likely to be affected' by the material change of water supply from a spring-fed reservoir to a repurposed reservoir that will also be fed by Southern Water's recycled effluent.

## Appendix A

Key facts that help to demonstrate that the Southern Water (SW) consultation process has not been adequate, set out roughly in a timeline as follows:

- a) The HWTWR scheme was not in the SW WRMP19; the selection of the project in December 2021 was a 'material change' to the plan for the following reasons.
  - A change from Fawley desalination to effluent recycling via Havant Thicket Reservoir.
  - A material change to the drinking water customer base that would be impacted, as Portsmouth Water customers in Hampshire & West Sussex will also receive the recycled effluent manufactured by SW.
  - Discharge of recycled effluent is into a confined reservoir not a free-flowing river, with significant potential environmental impacts & additional risks.
  - Discharge into the Solent via the Eastney long-sea outfall of reject water containing 4x more concentrated contaminants than the existing discharge, along with recycling plant cleaning chemicals and treatment byproducts.
- b) SW Gate 2 report, Annex 5, page 268, confirmed that SW would expect to undertake an update of WRMP19 on the basis of there being a 'material change' in circumstances. A revised report was not provided for public consultation.
- c) SW Gate 2 report, Annex 3, page 226, recognised that the need case for an alternative solution is not beyond challenge because the HWTWRP did not feature in WRMP19 as being a preferred solution.
- d) Southern Water **did not carry out any appropriate consultation on this material change in option selection, as required by the Water Industry Act** (Section 37 A & B).
- e) SW's own earlier Feb 2021 consultation document confirmed that; 'the scope of the consultation was to consult on the base case (Fawley desalination) and it **was not an options appraisal consultation where consultees were asked to select a preferred option.**' (SW feedback report pdf page 7). The consultation was not designed to select an option.
- f) **RCPC were not copied in on the February 2021 consultation**, where effluent recycling via the Havant Thicket reservoir was first identified as one of eight backup options (SW feedback report pdf page 87), even though the reservoir is within the parish boundary.
- g) Public notices were not placed at the proposed reservoir area site entrances or the Water Recycling Plant (WRP) site in Feb 2021, depriving those who used these recreational areas of the opportunity to be aware of and comment on the consultation.  
*Note: The WRP site was subsequently fenced off from public use in about 2024.*
- h) Local authorities and regulators who responded to the February 2021 consultation indicated that it did not include enough information on the backup options to Fawley desalination, or environmental information to be able to make an informed assessment, or provide substantial comments (SW 2021 feedback report page 22 & 23, Inadequacy Report Appendix C, item 2)

- i) SW's consultation report confirmed that only one press release was issued to advertise the 2021 consultation and that did not even mention that the consultation included a backup option for effluent recycling via HT reservoir (SW feedback report pdf page 89). Thus, it is clear that the 2021 consultation was **not advertised in a "way calculated to bring it to the attention of persons likely to be affected by it" including residents of RCPC, as required by the legislation** (Water Industry Act, Section 37B).
- j) No further public consultation took place between the February 2021 consultation and selection of HWTWRP scheme by SW in December 2021. Communities likely to be affected by the HWTWRP were not consulted, including RCPC before selection.
- k) SW Gate 2 report issued to Ofwat in December 2021 confirmed that their selected option was no longer Fawley desalination, it was the HWTWRP.
  - **RCPC were not made aware of this decision at the time.**
- l) **The first public consultation on the HWTWRP took place in July 2022. This was 6 months after Southern Water had already selected the option in December 2021.**
- m) Signs were not put up at the reservoir area site entrances nor at the Water Recycling Plant site in 2022 to notify recreational site users of the online consultation.
- n) The first consultation on the selection of HWTWRP as an option did not take place until November 2022, a year after the option had already been selected, when their draft WRMP24 consultation was published.
  - By then it was too late to influence the option selection, Southern Water were pressing ahead with the HWTWRP.
- o) In 2021, 2022 & 2024 no information was sent to water company customers who would be impacted by the proposed change in their source of drinking water, notifying them about the consultations, or the proposal for using recycled effluent to supplement public drinking water supplies in south Hampshire & West Sussex (even though they are *persons likely to be affected*).
  - Surely such a fundamental change should be accompanied by a more appropriate level of consultation, especially where the technology is to be used for the first time in the UK for public water supply. There was clearly a public interest in this matter.
  - By ignoring the functional impact on Portsmouth Water customers, Southern Water failed the test of fairness and breached the duty to consult a primary stakeholder community.

Note: There has been no national or local debate about whether effluent recycling is the right solution to meet the country's water supply needs going forward. The HWTWRP will set a national precedent as the first in the country. Scrutiny and public consultation should be of the highest calibre. If the poor level of public consultation undertaken for the HWTWRP is not challenged, it will set the precedent for all other effluent recycling schemes that follow. It is considered that Parish Councils (and also residents) have a right to be consulted on any such significant change to the drinking water supply in their area.

# **Inadequacy of Consultation Report**

## **Hampshire Water Transfer Water Recycling Scheme**

### **Prepared for Rowlands Caste Parish Council**

#### **(i) Purpose & Overview**

The purpose of this report is to review and highlight any inadequacy in the consultation process undertaken by Southern Water (SW) before and after the selection of effluent recycling via Havant Thicket Reservoir in 2021, known as the Hampshire Water Transfer & Water Recycling Project (HWTWRP).

The report confirms that SW **have failed to comply with the legal requirements of the Planning Act and the Water Industry Act 1991** including;

- **Failure to consult when their Water Resource Management Plan materially changed.**
- **Failure to consult those ‘likely to be affected’ by the project at the formative stage of the plan when the option was selected and subsequently.**
- **Failure to robustly consider and consult on alternative options before selecting HWTWRP, including an alternative environmental buffer lake.**
- **Failed to take into account the scale of public objection and address concerns raised.**

#### **(ii) Key failures and concerns regarding the inadequacy of the consultation process**

The concerns have been set out in 8 sections summarising the consultation failures.

1. **Failure to follow the statutory consultation process set out in the Water Industry Act (and required by the Gunning Principles) before the selection of effluent recycling via Havant Thicket Reservoir when there was a ‘material change’ to the SW plan (Sec 1, Pg 7)**  
SW have not followed the statutory consultation process set out in the Water Industry Act 1991 (Section 37A & B) before the selection of effluent recycling via Havant Thicket Reservoir when there was a material change to the plan.
2. **Failure to ensure that those ‘most likely to be affected were consulted (Sec 2, Pg 10).**  
SW have not ensured that those “persons most likely to be affected” by HWTWRP were consulted as required by the Water Industry Act 1991 (Section 37B) including;
  - Those residents in the Rowlands Castle and Havant areas where the majority of the new infrastructure for the HWTWRP scheme is located, including the Havant Thicket Reservoir where the recycled effluent will be discharged. By the time they were consulted in 2022 it was too late to influence the plan, the decision had already been made to proceed with this option in 2021.
  - Customers in communities across south Hampshire (including RCPC) and West Sussex who will receive the recycled water (both Southern Water & Portsmouth Water customers)

3. **Failed to follow the Gunning Principles** (Sec 3, Pg 15).  
**Specifically, SW have failed to ensure:**
- **That consultation took place when the proposals were at a formative stage**
  - **The information provided was sufficient to give ‘intelligent consideration’** (Pg 17 ).
  - **The product of consultation was conscientiously taken into account by decision makers** (Pg 20)

There was no consultation at the formative stage of the plan;

- a) when the replacement to the Fawley desalination option was selected (i.e. the HWTWRP)
- b) before the pipeline route through Havant was selected.

Consumers and the public impacted by the plan were not consulted on the proposed HWTWR Project until summer 2022 by when it was too late to influence the option selection as SW had taken the decision to proceed 6 months earlier in December 2021. In 2022 48% of respondents did not support the HWTWRP and 46% did not support the options appraisal process, but SW still ploughed ahead with the scheme regardless (see also 8.11).

4. **Inadequate consultation to select an effluent recycling option in Hampshire** (Pg 23)  
The SW 2021 public consultation was not designed to select an alternative option to Fawley Desalination and was not adequate to select effluent recycling via Havant Thicket Reservoir, or any other option. A new consultation should have taken place when there was a material change to the SW water resource plan, before the final option was selected.
- Regulators and Local Authorities indicated that they were unable to make informed or substantial comments on the 2021 consultation due to the lack of information provided on the alternatives (see Section 4 & Appendix C item 2).
5. **Failure to take lack of public support & falling support for the HWTWRP into account** (Pg 25) There is a lack of public support for the HWTWRP with 68% of respondents objecting to the scheme, and support having fallen by 20% since the 2022 consultation. The scale of objection did not trigger a review of all potential options and has not been adequately taken in account. **There is no public mandate for the HWTWRP, even though it will be funded by customers.**
6. **Concern that SW have not been open and transparent** (Pg 27)  
Information presented by SW has not been open and transparent. Omission meant that it was not clear which communities would receive the recycled water at their taps. Key information was redacted or restricted to prevent open discussion of the options and impacts, and was difficult to get straight answers to questions submitted by the public. The company was less than open about the risks associated with effluent recycling.
7. **Concern that SW have misrepresented the facts/ truth** (Pg 33)  
SW have misrepresented the facts/ truth, with examples provided, including ignoring 39% of the 2024 consultation responses in the analysis summary, in contradiction of the Planning Act Section 49 Duty to take account of responses to consultations (see Section 7.2).

8. **Other failings and concerns**

A summary of 15 other failings and concerns are listed on page 37, examples include;

- Explaining why the SW Adequacy of Consultation Milestone Report (October 2025) does not highlight inadequacies in the consultation process (see 8.1) including.
- Failure to set up a community consultation sub-group requested by reservoir and community stakeholders in both 2022 and 2023 by those most affected (see 8.4).
- Failure to consult on whether customers are prepared to drink recycled water & SW not taking into account the impact of customers rejecting their tap water for drinking (see 8.5).
- Legislation and national guidance is not in place to provide adequate control (see 8.8).
- Setting a national precedent for the way forward without having a national debate (see 8.9).
- SW report acknowledged that the inadequate opportunity for consultation and scrutiny results in the risk of a public inquiry & delays (see 8.13)

A more detailed explanation of the key concerns regarding the inadequacy of the consultation process are set out in Section 1 to 8 of the report, along with source reference documents. For each of the concerns the report sets out information and examples to demonstrate Southern Water's failure to adequately consult on the selection and development of this water resource option.

Southern Water stated on Page 7 of their Statement of Community Consultation (SoCC) – Summer 2024 that; “Our objective for public consultation is **to ensure that our customers, stakeholders and local communities who may be affected by the Project have an opportunity to understand, comment on and inform the proposals**”. This should also have been the objective of earlier consultations.

**This report demonstrates that they have failed to achieve that objective, from before the selection of the option (at the formative stage) and subsequently.**

This was a once in a generation chance to address future water supply needs for the next 50 years. There needed to be a much more open discussion about the pros and cons of the options available and those preferred by customers before the selection was made, including the more sustainable alternatives that could work in combination with predicted changes to the climate, rather than against it.

**There has been a lack of consultation on the need for this specific scheme (HWTWRP)**

Robust public consultation on SW's Water Resource Management Plan (WRMP) and subsequent HWTWRP proposal was key to selecting the right choice for water supply into the future. Sadly, SW have let the community down.

**The Southern Water consultation to date has certainly not been adequate to support selection of the HWTWRP as an option that;**

- **Fundamentally changes the source of drinking water across south Hampshire and West Sussex, from natural sources to include water manufactured from final sewage effluent, impacting Portsmouth Water customers who were not consulted.**
- **Will have a profound impact on the Havant Thicket Reservoir which was to have been primarily fed from natural chalk springs, depriving us of a unique biodiversity opportunity to create the first chalk spring fed reservoir in the world.**
- **Will have potentially significant environmental impacts on the reservoir, Langstone Harbour SPA/ SAC, as well as high energy use and greenhouse gas emissions.**

- **Is in breach of the Paris Agreement on Climate Change as other lower carbon emission solutions are available but have not been properly investigated.**

Table 1 provides a concise statement of the principle matters that demonstrate that the consultation undertaken by Southern Water in relation to the HWTWRP was not legally or procedurally adequate.

**Table 1: Checklist of principal matters indicating that Southern Water’s consultation was inadequate**

<b>Concern</b>	<b>Relevant section(s)</b>	<b>Brief evidence summary</b>
<p>Consultation did not occur at a formative stage.</p> <p>Failure to follow the Gunning Principles.</p>	<p>Section 1; Section 3.1; Section 4; Appendix A; Appendix C page 1 last bullet, plus items 1 &amp; 9</p>	<p>The HWTWRP Scheme was selected by SW in late 2021 <u>before</u> the public was consulted on that option, with consultation of those most impacted following only after the preferred option had already been chosen and developed.</p>
<p>No lawful or meaningful re-consultation followed a material change to the plan.</p>	<p>Section 1; Section 8.1(b); Appendix A; Appendix C concluding analysis</p>	<p>Once the WRMP19 selected option(s) materially changed and the HWTWRP was selected, Southern Water should have prepared a revised draft plan and undertaken fresh consultation <u>before</u> proceeding.</p>
<p>Process inconsistent with the Water Industry Act 1991 and relevant guidance on a material change to their plan.</p>	<p>Section 1; Section 2 (inc. opening paragraphs); Appendix C concluding additional information</p>	<p>Section 37A of the WI Act and related guidance required publication of a revised draft plan and consultation where there was a material change affecting the plan and those “likely to be affected”.</p>
<p>“Persons most likely to be affected” were not adequately identified, notified or consulted.</p> <p>Failure to follow Planning Act (section 47) duty to consult the local community.</p>	<p>Section 2; Section 3.1; Section 6.7-6.8; Appendix B; Appendix C (page 1 bullet 11, items 4 &amp; 9)</p>	<p>In 2021 residents near the reservoir, Budds Farm, the Water Recycling Plant and pipeline corridors were not properly alerted to the consultation, and that local publicity and site-based notification were inadequate. With no site signage in 2021 &amp; insufficient signage in 2022. Rowlands Castle Parish Council &amp; Horndean Parish Council were not consulted in 2021.</p>
<p>Portsmouth Water customers (which include residents of RCPC) and other SW customers likely to receive recycled water were not directly engaged.</p>	<p>Section 2; Section 6.4 &amp; 6.20; Section 8.5(b); Appendix C items 4 and 9</p>	<p>The consultation materials did not clearly identify the SW customer areas that would receive recycled water and that Portsmouth Water customers who would receive the water were not specifically informed or engaged.</p> <p>Not all LA’s whose communities would be impacted by the change in drinking water source were consulted.</p>

<b>Concern</b>	<b>Relevant section(s)</b>	<b>Brief evidence summary</b>
Consultation materials did not provide sufficient information to permit intelligent consideration and response.	Section 3.2; Section 4; Section 6.4-6.6; Section 6.16-6.19; Appendix C items 2, 3 and 4	Insufficient information was provided during the consultation on communities to be affected (no maps), alternatives, potential environmental effects, water quality implications, modelling assumptions and key technical issues.
Material technical information was omitted, restricted, redacted or otherwise inaccessible.	Section 6.2-6.3; Section 6.5; Section 6.17-6.19, Section 8.12	Key option appraisal, environmental assessment information and supporting technical documents were heavily redacted, designated restricted, delayed, or insufficiently disclosed to enable effective scrutiny.
Consultees were not afforded a fair opportunity to comment on a reasonable range of alternatives.	Section 1; Section 3.4c; Section 4; Section 6.3; Section 6.5; Section 7.6; Section 8.2 & 8.11 Appendix C items 2 & 3	The option appraisal process was not conducted with sufficient transparency, nor opportunity to comment. Weighting and scoring were not disclosed, and significant objection did not trigger a robust reconsideration of all reasonable options. The inadequacy of the SW review of options was also highlighted by the regulators.
Consultation was inadequately publicised and insufficiently targeted.	Section 2; Section 4; Section 6.7-6.8; Appendix B; Appendix C items 7, 8, 9 and 10	There was limited direct notification, no or poor site signage at sites affected, insufficient local publicity. Insufficient engagement with affected communities including those who will have to drink the recycled water, including lack of deposited materials in the wider affected areas.  The 2021 consultation was online only and not targeted to those impacted by the HWTWRP which was listed as a backup option (not the selected option).
Timing, scale and complexity of the consultation reduced the public's ability to participate effectively.	Section 3.3; Section 6.16; Section 6.18; Appendix C item 8	Consultations were timed during summer periods and involved complex, extensive and sometimes inaccessible materials, making meaningful participation difficult.
Consultation responses do not appear to have been conscientiously taken into account.	Section 3.4; Section 5; Section 7.2; Section 8.11 & 8.12	Despite substantial objection and declining public support, Southern Water did not revisit the preferred option or undertake a broader review of alternatives.
The treatment of the 2024 consultation responses gives rise to serious concern because	Section 3.4, Section 7.2; Section 8.1(c)	SW have confirmed that written responses (385 emails and 3 letters) were not included in the published

Concern	Relevant section(s)	Brief evidence summary
email and letter responses were excluded from the summary statistical analysis. This omission amounts to a failure to comply with section 49 of the Planning Act 2008.		summary statistics, as a result the scale of objection was understated. Demonstrating that consultation responses have not been conscientiously taken into account.
Consultation response reporting and summary documents are misleading, incomplete, or materially unbalanced.	Section 6.15; Section 7.2; Section 7.4-7.8; Section 8.1(a) and (c)	The reports summarising responses grouped concerns at too high a level, omitted important context, and presented outcomes in a way that may understate the scale and substance of the objections.
The process appears inconsistent with Southern Water's own stated consultation objective.	Purpose & Overview; Section 2; Section 3; Section 8.1; Section 8.5(b)	Southern Water's own stated objective of ensuring customers, stakeholders and local communities affected by the project had a genuine opportunity to understand, comment on and inform the proposals with evidence was not achieved.
The scheme's nature and impact required a materially higher standard of consultation.	Purpose & Overview; Section 2; Section 5; Section 7.3; Section 8.5(a)-(c); Section 8.9	The scheme will fundamentally alter the source of drinking water for many customers and has significant environmental and public confidence implications, requiring especially open & robust consultation which has not been achieved.

The section references in the table are included for ease of reference against the main report text and provide examples of parts of the report supporting each concern. There will be other examples relevant to the concerns throughout the report.

Taken together, these matters indicate that **the consultations on the HWTWRP were neither sufficiently early in the selection process, sufficiently informative, nor sufficiently inclusive, nor responsive to consultation feedback to satisfy the standard of adequacy required in the circumstances of this scheme**, which results in a major change to the drinking water supply for customers across south Hampshire and West Sussex, as well as significant impacts from the infrastructure & operation of the plant.

*Technical Report on Inadequacy of Consultation, HWTWRP (May 2026 – Final)*

*Prepared by: Tracey Viney*

*Technical Advisor to Rowlands Castle Parish Council*

*Retired Drinking Water Inspector, Environmental Regulator & HT Reservoir project Manager*

**Section 1: Failure to follow the statutory consultation process set out in the Water Industry Act (and required by the Gunning Principles) before the selection of effluent recycling via Havant Thicket Reservoir when there was a ‘material change’ to the SW plan**

SW have not followed the statutory consultation process set out in the Water Industry Act 1991 (Section 37A & B) before the selection of effluent recycling via Havant Thicket Reservoir when there was a material change to the plan from Fawley desalination.

**Section 37A of the Water Industry Act 1991 requires that a water undertaker shall prepare (and publish) a revised plan (a) following conclusion of its annual review, if the review indicated a material change of circumstances.**

The UK government water resource planning guidelines, Section 3.9 indicates; that **if there is a ‘material change’ of circumstance you must prepare a revised draft plan for publication. Material changes include new or significant changes to the measures that were identified in the published plan and are likely to have significant public or environmental interest/ effect.** Any such material change in circumstances **required a consultation exercise in accordance with the procedures set out in Section 37 B & C** of the Water Industry Act. Specifically, SW would be required to publish the proposed revisions to its WRMP in a way **“*calculated to bring it to the attention of the persons likely to be affected by it.*”** This should have included both Southern Water and Portsmouth Water customers, as both would be affected by the change in the source of their drinking water. SW have not done that.

The HWTWRP was a completely new option that was not included in WRMP19 and one that would clearly have;

- a) significant public interest; as a new manufactured source of drinking water from sewage effluent using technology new to the UK for public water supply, and
- b) environmental interest and potential significant effect on the environment due to the likely impact of the discharge into the enclosed Havant Thicket Reservoir, 45km pipeline route, greenhouse gas emissions, as well as the risks to Langstone Harbour (multiple potential impacts) & the Solent (4x more concentrated effluent discharged).

**Selection of the new HWTWRP option was a very significant material change.**

This failure to comply with the statutory consultation process set out in the Water Industry Act has **denied the community affected by Southern Water’s planned infrastructure, and those who will have to drink the recycled effluent, the opportunity to engage at the formative stage of the plan** when the Hampshire effluent recycling scheme was selected in 2021. This failure to comply with the legal requirements must be challenged by the Secretary of State for Defra, Ofwat, the Planning Inspectorate, local authorities and others.

**This also represents a failure of the duty for the applicant to consult the local community at the pre-application stage under the Planning Act 2008 (section 42, 47 & 48), and in accordance with the Gunning Principles, as there was no consultation at the formative stage of the plan before the HWTWRP was selected.** This defect was not remedied by the later consultation, because by then SW had already selected HWTWRP and there was no longer any meaningful opportunity to influence the strategic direction of the project at the formative stage.

When the Fawley desalination scheme and back up recycling option with discharge to augment the River Itchen set out in WRMP19 were both rejected, Southern Water should have reviewed all potential options (not just recycling and desalination options) and re-consulted on their plan.

## **What makes the selection of effluent recycling via Havant Thicket Reservoir a material change?**

The change in the plan triggered by the failure of the preferred and alternative option represents a 'material change' from the options selected in WRMP19 for the following reasons.

- Both the previously selected options in WRMP19 (Fawley desalination) and the alternative back-up solution (Water recycling via the Lower Itchen) were rejected by SW. The proposal to use the Portsmouth Water (PW) reservoir for effluent recycling was **not a selected option in the WRMP19 plan. It is a 'new' option fundamentally different to discharging recycled effluent into a free-flowing river**, as are the impacts that needed to be considered. With a significant risk of geochemical changes, bioaccumulation of contaminants that pass through the treatment process, increased pollution risks if the plant fails or is not adequately maintained. Risks that never existed with the spring fed reservoir.
- PW customers would be significantly impacted by the change to direct recycled effluent to the Havant Thicket Reservoir. Not only because it **materially changed PW's original spring fed reservoir proposal** (requiring a new planning application and impact assessments), but **also because PW customers would receive the recycled drinking water**, a completely different source to the natural sources they currently receive. Yet **PW customers were never consulted when this material change happened**. Water from the desalination plant or Itchen Water recycling option would only have been distributed to SW customers.
- **The use of the reservoir as an 'environmental buffer lake' for this option is a material change**. It is considered that the environmental impact on the reservoir (geochemistry, salinity, temperature etc.) and coastal environment of the SW proposal is significant. Even now, five years on from SW's decision to select the HWTWRP the robust modelling and environmental impact assessment has **not** been completed for all contaminants of concern in order to understand the risks, with direct pathways to the internationally important coast not properly considered in the early assessments. As a result, **it is not possible that in 2021 that the impact of the newly selected option could have genuinely been assessed as insignificant**, a precautionary approach should have been taken, triggering full re-consultation on the options.
- Reject water discharged via the Eastney long-sea outfall into the Solent will be 4x more concentrated than the sewage effluent currently discharged, with addition of cleaning chemicals and treatment byproducts.
- There is also the potential for a significant environmental impact from the proposed construction of the effluent recycling plant on the Broadmarsh dilute and disperse landfill, including on the highly protected coastal habitats of Langstone Harbour.
- The HWTWRP required up to 6 new pipelines, including a 40 to 45km pipeline across south Hampshire from Havant to Otterbourne.
- The SW Gate 2 document flagged the risk of pursuing alternative options that were not in WRMP19, including the risk of appeal causing delays to the SW programme, which in turn will result in unnecessary delays to improved protection for the River Itchen & Test.

As a result, **it is clear that the selection of HWTWRP was a material change and that SW have not followed the legally required statutory consultation process when their Water Resources Management Plan materially changed, nor the Gunning Principles (Planning Act 2008).**

A timeline that demonstrates this is included in Appendix A.

SW will assert that they did subsequently consult on their draft WRMP24, but that was **not until a year after they had unilaterally selected the HWTWRP as their preferred option in December 2021**, proceeded to develop the design and consulted on that design. This is confirmed by the following dates for the consultations.

- *Summer 2022 consultation on HWTWRP design (5 July and 16 August 2022)*
- *Winter 2022/23 consultation on draft WRMP24 (14 November 2022 to 20 February 2023)*

The Fawley community were given many opportunities/years to comment on a number of consultations, including WRMP14 & 19. The community and customers impacted most by the effluent recycling via Havant Thicket Reservoir option had not been given that same opportunity to comment.

**This demonstrates that there was no genuine opportunity for customers or communities impacted by the selection of the HWTWRP to engage at the formative stage when the option was selected, including the residents of RCPC.**

The fact that 48% of respondents to the summer 2022 consultation (the first public consultation on the scheme) indicated that they did not support the HWTWRP (with 41% strongly not supporting & 10% having no view) made no difference, as by then it was too late, SW were pressing ahead with the scheme regardless.

For the summer 2022 consultation it is clear that SW were only looking for information to refine their proposal for the HWTWRP, there was not a genuine opportunity to influence the decision to select that option.

Note 1: SW's own Adequacy of Consultation Milestone Report states in the Executive Summary that the Summer 2022 Consultation (July to August) merely; "gathered views on the new approach, including the proposed location of the Water Recycling Plant, pipeline corridors, and locations for Above Ground Plant. Key public concerns included drinking water quality, potential environmental impacts, and potential construction traffic disruption. This feedback helped to refine the proposed pipeline routes and the design of the Project". The lack of public support for the option, or the options appraisal process is not made clear.

Note 2: SW WRMP Annual Review 2020-21(Dec 2021), Section 5, Consideration of the potential for a material change to WRMP19, considers the change from Fawley desalination and the alternative then rejected option of water recycling with discharge to the Lower Itchen, to the selection of HWTWR. It acknowledges that "If the changes are 'material' you must prepare a revised draft plan for re-consultation" Any such material change of circumstances will require a consultation exercise in accordance with the procedure set out in section 37B and section 37C of the WIA. In particular, SW would be required to publish the proposed revisions to its WRMP in a way "calculated to bring it to the attention of persons likely to be affected by it."

However, the SW review of the material change only focused on whether the selection would be likely to significantly impact on customers through higher bills, changing their security of supply or significantly affect the environment. It suggested the cost of HWTWR option B4 could be lower than desalination and would not change the security of supply. SW suggested that the environmental impact could be lower but they had no evidence to substantiate this in 2021 as the environmental impact assessment work had not been undertaken. As a result a precautionary approach should have been taken and it was not.

The SW review did not consider the public interest from the proposal to use effluent recycling (the first use of this technology in the UK), the different customer base that would be impacted, including Portsmouth Water customers who had not been consulted, the impact of the discharge of recycled effluent into a largely confined reservoir not a flowing river, the risk of constructing the proposed plant on a contaminated landfill site alongside the Langstone Harbour SPA/SAC, nor the 4x more concentrated discharge to the Solent. As a result, the review as to whether this was a material change was not robust. A more complete review of the significant and material changes that result from the HWTWRP are presented on page 8 of this report.

## **Section 2: Failure to ensure that those ‘most likely to be impacted’ were consulted**

The Water Industry Act 1991, Section 37B, requires the draft water resources plan to be published “in a way calculated to bring it to the attention of persons likely to be affected by it “.

SW have **completely failed to follow this legal requirement to do that for their consultations in 2021, 2022, 2023 & 2024.**

**Determining who are “persons likely to be affected”:** Section 47 of the Planning Act refers to "people living in the vicinity of the land," the natural reading of that provision—consistent with Parliament’s evident intention to ensure meaningful engagement with those affected by nationally significant infrastructure—must extend to those who, whilst not geographically proximate to the works, are the primary recipients of a project’s output. This interpretation aligns with the "persons likely to be affected" standard in the Water Industry Act 1991 and with the Gunning Principles, and it should be preferred over a purely cartographic reading of "vicinity" that defeats the statutory purpose. By ignoring the functional impact on Portsmouth residents, Southern Water failed the test of fairness and breached the duty to consult a primary stakeholder community.

SW have not ensured that those people most likely to be impacted by their plan were consulted as required by the Water Industry Act 1991 (Section 37B) including;

- Those in the Rowlands Castle and Havant area where the majority of the new infrastructure for the HWTWRP is located, including the Havant Thicket Reservoir where the recycled effluent will be discharged.
- Customers in communities across south Hampshire and West Sussex who will receive the recycled water (both Southern Water & Portsmouth Water customers)

Residents in the Havant area where the majority of the new infrastructure for the scheme is to be located (Water Recycling Plant, up to 6 pipelines & high lift pumping stations), including the Havant Thicket Reservoir into which the recycled effluent from the scheme will be discharged, were not specifically consulted in 2021 when potential ‘back up’ alternatives to the then selected desalination scheme were first mentioned. Nor were Rowlands Castle residents who have half of the reservoir site in their parish. Not even the Parish Council were consulted.

- In 2021 Southern Water did not make it clear which communities they supply drinking water to would receive the recycled effluent at their taps in their consultation materials.
- Portsmouth Water customers were not consulted in 2021 and new nothing about the proposal until after the HWTWRP was selected by Southern Water, even though they will also receive the recycled water at their taps if the project goes ahead.

This also highlights that Southern Water have **not met the Planning Act, Section 47, Duty to consult the local community** which includes people living in vicinity of the land and local authorities. In the context of the HWTWRP surely this duty to consult must extend to those who will be the primary recipients of a project’s output (the recycled water). Consultation should have taken place with.

- All consumers who will receive the recycled effluent at their taps, as they will be impacted by the scheme (Southern Water & Portsmouth Water).
- As well as the local authorities whose residents will receive the water, not just those LAs with the physical infrastructure in their administrative area. At present only 7 LA’s have been consulted by SW. This should include all relevant Parish Councils.

- All those in the vicinity of planned infrastructure (the recycling plant, pipelines, pumping stations and the reservoir to be used for the discharge of the recycled effluent)

Southern Water stated on Page 7 of their Statement of Community Consultation (SoCC) – Summer 2024 that; “Our objective for public consultation is to ensure that our **customers, stakeholders and local communities who may be affected** by the Project have an opportunity to understand, comment on and inform the proposals”. Presumably this was the objective of the other consultations. **The applicant has NOT achieved this objective.**

- There were no details of the specific locations for the HWTWRP plant or the environmental impacts in the SW 2021 consultation after which the scheme was selected. The 2021 consultation was only online, with no targeted action to raise awareness in the Rowlands Castle or Havant area most impacted, no letters to residents, no exhibition events in the community, and no copies of the consultation materials deposited in libraries. Further detail on why the 2021 consultation was inadequate is provided in Section 4 and Appendix C.
- The Overview Map provided within both the 2022 & 2024 HWTWRP consultation documents did not show which communities would be impacted by receiving the recycled water, nor that customers in the Portsmouth Water supply area would receive the recycled water (see Page 13).
- No information has been supplied to SW or Portsmouth Water customers who will receive the recycled water about the consultations through direct mailing (letters or email) or in leaflets with water bills.
- There was no signage (posters) put up at the sites to be impacted by new infrastructure at the time of the consultation in 2021, nor in 2022 to advise people about the consultation. Not even at the 9 entrances to the popular recreational area that will become the Havant Thicket Reservoir site. Two posters were eventually put up a 10-to-15-minute walk away from the reservoir site. The locations were inappropriate & the posters were not eye catching, photos have been provided in Appendix B. Even these 2 posters which were distant from the reservoir site were removed at least 10 days before the 2022 consultation ended.
- Despite objectors criticising the lack of signage at sites impacted in 2022 even for the 2024 consultation the signage at the reservoir site was very poor and inadequate, comprising an A4 poster with very small print and complex text.
- Copies of the consultation brochure (2022 & 2024) were only deposited in libraries where the infrastructure was planned, not in areas that would only receive the recycled water, such as Southampton, Winchester, Gosport, Chichester and Hayling Island.
- Feedback from respondents to consultation questions indicated that the public did not believe that the consultations had been well promoted. For example, in 2024 on the question as to whether the consultation was promoted well and to the right people, **79% did not think it was very well promoted** (i.e. average to very poor), with 58% indicating the promotion of the consultation was poor or very poor. The figures in 2022 were very similar at 75% and 56%.
- In March 2022 an Ofwat report on funding for the project proposed imposing a 10% penalty on SW. The reasons given included;
  1. There had been insufficient stakeholder engagement, particularly with customers who will receive the recycled water.
  2. Insufficient progress made in carrying out key environmental assessments (SEA,HRA,WFD)
  3. Insufficient environmental monitoring data to understand the impacts & risks

Section 3.2.2 of the later Ofwat May 2022 report stated;

“The **level of stakeholder engagement which was conducted for this solution fell short of the requirements** of a gate two submission, which was an important factor in relation to our decision to impose a 10% penalty. As a priority action we expect Southern Water to fully engage with stakeholders and customers to provide clear information about the solution”. They went on to say the work must be extensive, detailed and focused particularly where there may be a change in source, as thorough engagement with customers and stakeholders on recycling is key to the success of this solution.

Given this clear requirement from Ofwat it is extremely disappointing and surprising that SW failed to widely publicise the Summer 2022 HTTWR consultation to all those Southern Water and Portsmouth Water customers who would receive the recycled water, if the scheme went ahead.

- Southern Water refused to set up a stakeholder sub-group when requested in 2022 & 2023 by reservoir stakeholders. The group subsequently set up by Portsmouth Water was only permitted to discuss communication matters, not the wider concerns of stakeholders about the effluent recycling proposal. SW did not attend; the group was ineffective and subsequently closed.
- Even a public meeting in Havant had to be initiated by the community and revealed the high level of concern and objection to the HWTWRP, with a very high level of attendance.

International case studies from drought-stricken countries around the world that use effluent recycling stress the importance of engaging early and getting customers onboard in advance for such effluent recycling schemes to be successful. Southern Water's failure to engage constructively with customers regarding the acceptability of the effluent recycling solution is deeply concerning, given the profound impact this change will have on the source of customers drinking water supplies. In a submission to Ofwat in 2024 SW indicated that engagement with customers who will receive the water will take place in 2033. This is only 3 years before the forecast completion date of the project and will be too late for customers to influence the decision.

A timeline is provided in Appendix A to show that the **communities most impacted by the scheme in the Havant, Bedhampton and Rowlands Castle area were kept in the dark about the proposal for effluent recycling via Havant Thicket Reservoir, until after the decision had been taken by SW to select the HWTWRP**. Eventually some members of the community found out by chance following an article in a national newspaper on 5 May 2021 in which it mentioned “*The company said it was also exploring the feasibility of recycling water and transferring it from a new reservoir at Havant Thicket, near Portsmouth, a scheme that it said had recently emerged as a potential backup to desalination*”.

Even if someone in the Havant community had by chance become aware of the 2021 consultation they may not have been unduly concerned and raised the alarm with other members of the community, as it was clear in the consultation brochure that effluent recycling via Havant Thicket Reservoir was not a selected option, the selected option was Fawley desalination, it was just one of many alternatives being considered as a backup option, without any details, and the text made it clear that further consultation would be required were SW to want to select it. Unfortunately, that further consultation did not take place before the HWTWRP was selected and advanced by SW.

The revised draft Water Resource Management Plan was not published at the time of the Summer 2022 consultation on the HWTWRP. The draft WRMP24 consultation should have been completed before the consultation on the HWTWRP.

Southern Water asked respondents to the Summer 2022 Consultation to indicate if they supported water recycling and transfer as the proposed solution but provided inadequate information for the

average person to be able to answer that question in any meaningful way. Inadequate information was provided on alternatives to effluent recycling, or what other effluent recycling options might be available for consideration. Previous customer research had indicated that customers preferred more natural solutions such as reservoirs and aquifer storage, but these were not offered as alternatives.

By the time of the 2022 consultation on the HWTWRP it was too late to influence the selection of the scheme, as the scheme **had already been selected by SW, with no opportunity to change or influence that decision**. However, it is important to note that;

- 48% of respondents did not support the HWTWRP (rising to 68% in 2024).
- 46% of respondents did not support the options appraisal process.

**The HWTWRP Overview map did not make it clear which communities would receive the recycled water** in the 2022 consultation (Page 15) or 2024 consultation (Page 5) documents. Both maps only showed mixed water being transferred from the reservoir across to Otterbourne and being distributed from there to SW customers in all directions, but it was not clear which communities served by Southern Water across south Hampshire would receive the recycled water at their taps. There was also no arrow to indicate that Portsmouth Water customers would also receive the recycled water, they were completely in the dark.

- Most consumers of both Southern Water & Portsmouth Water remain unaware that the source of their drinking water will fundamentally change (if this scheme goes ahead) from river & aquifer sources to being produced from final sewage effluent.
- Such a fundamental change required a much more open public awareness campaign and debate, including letters and information to all customers presenting both the advantages and disadvantages of effluent recycling.
- When consumers become aware of the proposal to recycle treated effluent, they are shocked that Southern Water could make such a significant change to the source of their drinking water without having consulted all customers who will receive the water so that they had the opportunity to comment.

When challenged in 2022 about the Overview maps not showing that PW customers would be impacted, SW acknowledged that the map should have shown this. They advised that they would consider what they could do to address this but then did nothing. The same overview map was used in 2024 it was not updated to correct the error. Subsequently, SW advised as these were not their customers, they did not need to show that thousands of customers across the Portsmouth Water supply area (Emsworth, Chichester, Fareham, Gosport, Havant, Hayling island, Horndean, Portsmouth, Rowlands Castle, Waterlooville etc.) would receive the recycled water if the scheme went ahead. This is an unacceptable response and reflects a tick box (almost contemptuous) attitude to public consultation.

**This is a lose – lose situation for Portsmouth Water customers who were not consulted.**

They have all of the disruption of infrastructure construction, lose benefits associated with the reservoir which was to have been spring-fed, and they get to drink recycled water instead of the chalk spring and borehole water they are used to. Making it even more disappointing that Southern Water have failed to actively engage with Portsmouth Water customers.

It is not just Portsmouth Water customers who have been kept in the dark. A Southern Water customer from Warsash who will receive recycled water from the reservoir via Otterbourne noted in their 2022 consultation response; “I have received no information from the Company to tell me

about their proposal to recycle effluent, nor any information to indicate that a consultation was taking place, despite receiving 4 mail shots from the Company during the consultation period, one of which told me Southern Water were proposing desalination, which the consultation said had already been rejected. I have seen nothing in the media about their plans or the consultation, despite being an informed customer who had been keeping an eye out for it.”

**SW have not been transparent about their plans for a new pipeline which will extend the area in West Sussex across which customers will receive the recycled water.** They have failed to make it clear that if the HWTWRP goes ahead they plan to build an additional new pipeline in 2040 from Havant Thicket across the South Downs to Pulborough, to carry the mixed water (which will include recycled effluent) from the reservoir to a SW treatment plant, from where it will be distributed to a wider area of West Sussex, north to Midhurst and across towards Horsham. The customers over this wider area have not been made aware nor consulted.

**Effluent recycling in the UK should not proceed unless the water companies (SW & PW) have fully engaged with their customers to ensure that the majority support the proposal. This is not the case for the Budds Farm effluent recycling scheme via Havant Thicket Reservoir (HWTWRP).**

The Summer 2022 consultation was the first to take place where effluent recycling was both being promoted and selected as the preferred option. If effluent recycling is to proceed then SW should have consulted first. To date there had been no opportunity for the public, stakeholders, or customers to consider alternative options, not even which of several different effluent recycling options Southern Water have previously identified would have the least impact or would provide the best value/ be most acceptable. Instead, Southern Water have jumped from rejecting desalination at Fawley to implementing effluent recycling at Budds Farm utilising Havant Thicket Reservoir as the environmental buffer, without consulting on the options and without properly assessing the impacts and risks of the scheme. In 2022 they had not even assessed the impacts on the Havant Thicket Reservoir, nor Langstone Harbour.

Nor were the community or customers given the opportunity to consider or comment on alternative ‘environmental buffer’ solutions, such as discharge to an alternative environmental buffer lake, river (e.g. the River Wallington, or River Hamble), or an aquifer. The latter being used in many effluent recycling schemes abroad.

### **Section 3: Failed to follow the Gunning Principles, including the requirement to consult at the formative stage of the plan when the HWTWRP option was first selected**

**Failure to consult at the "formative stage":** The Gunning Principles require that consultation occurs when proposals are at a formative stage. The decision to pivot to the HWTWRP was made in late 2021, yet the February 2021 consultation was not to select an alternative option. By the time the summer 2022 consultation took place, the project had already been selected. This was **not a meaningful opportunity for residents to influence the strategic direction of the project, which is a clear procedural failure.**

SW did not follow the Gunning Principles, including no consultation at the formative stage of the plan when;

- a) The replacement to the Fawley desalination option was selected (i.e. the HWTWRP)
- b) When the pipeline route through Havant to the reservoir site was selected.

Southern Water confirmed on Page 7 of Statement of Community Consultation (SoCC) – Summer 2024 that; “There are **founding principles that apply to public consultation** in the UK to ensure that projects such as the HWTWRP undertake lawful consultations. These are known as The **Gunning Principles** and they require that:

- i) The consultation takes place when the **proposals are at a formative stage.**
- ii) The information provided is sufficient to give ‘intelligent consideration’.
- iii) The consultation period is adequate to give time for consideration and response.
- iv) The product of consultation is conscientiously taken into account by decision makers.

The following sections demonstrate how Southern Water has failed to meet three of these key principles (i, ii & iv), with some concerns also expressed about (iii) the time for consideration.

#### **3.1 Failed to ensure that consultation took place when the proposals were at a formative stage**

The formative stage of the plan when the HWTWRP was selected by SW was in December 2021. This was when the Fawley desalination scheme selected in WRMP19, and the backup effluent recycling option discharging recycled water into the River Itchen, were both rejected. The **HWTWRP was not an option considered and consulted on for WRMP19**, and it was not included in that plan.

The SW 2021 consultation (February to April 2021) was not designed by the company to select an alternative option; it took place when Fawley desalination was still their preferred option and primarily sought views on that option.

Nor was the 2021 consultation adequate to assess the preferred water resource options at the formative stage of the SW plan, once desalination at Fawley was rejected when the water resource management plan materially changed in late 2021. Instead, SW should have undertaken a review of all the potential options and then completed a new consultation. The reason for this assessment is explained in the following sections.

- Section 4 summarises the 12 key reasons why the 2021 consultation was inadequate to use as the basis for selecting a completely new option when the plan changed. With more detailed evidence and links to supporting references provided in Appendix C.
- Section 2 and Appendix C (4, 9, 10) set out the concern that SW did not ensure that those most likely to be impacted by the change in their plan were consulted when the plan changed, they were not even made aware of the earlier 2021 consultation. For example,
  - There was no direct mailing to customers who would receive the recycled water, not even information to indicate which customers of Southern Water and Portsmouth Water would be affected by the change in the source of their drinking water.
  - There was no direct mailing to those living close to sites where the infrastructure for the HWTWRP would be located. Public notices were not even put up at the sites which would be impacted such as the Havant Thicket Reservoir.

The SW Gate 2 submission (December 2021) to Ofwat confirmed that the SW selected option had changed to effluent recycling via Havant Thicket Reservoir. **There was no additional public consultation before SW selected the HWTWR option, thus no consultation took place at the formative stage of the plan**, despite SW stated written assurance that it would.

In fact, the subsequent public consultation on SWs draft WRMP24 which included the HWTWRP did not take place until winter 2022/23 (14 November 2022 to 20 February 2023). This was months after the design of the HWTWRP had already been developed and consulted on in summer 2022. Thus, it is clear that **customers and communities impacted by the change to the plan had no opportunity to comment at the formative stage before SW ploughed ahead with the design of the HWTWRP, providing no opportunity to influence the selection of this option.**

The **first public consultation on SW's proposed HWTWRP did not take place until summer 2022, 6 months after the decision had been taken by Southern Water to proceed with this option.** With 48% of respondents indicating they did not support the proposal for effluent recycling in 2022, and 46% of responses indicating they did not support the options appraisal process (with 22% neutral). Unfortunately, by the time the consultation findings were known it was too late for the public to influence the plan, SW had already selected this option in Dec 2021.

There is a **further example of where SW failed to consult the community at the formative stage** of their proposal before proceeding to select their preferred solution. This related to the choice of pipeline option and route.

- SW ran their Statutory Summer 2024 Consultation from 29 May to 23 July 2024. This consultation included questions on the pipeline routes, including the proposed pipeline between the Water Recycling Plant and the Havant Thicket Reservoir site.
- Yet on 4 June 2024 an application was submitted by Portsmouth Water (who are in partnership with Southern Water) for the construction of two pipelines in a tunnel to the reservoir (APP/24/00405), instead of the single pipeline that had already received planning consent from Havant Borough Council in October 2021 (APP/20/00991) to fill and drawdown the Havant Thicket Reservoir.

The reservoir project is a partnership between Southern Water who will pay for it and Portsmouth Water who own the land and are managing the construction of the reservoir. The spring-fed reservoir only required one pipeline between Bedhampton Springs and the reservoir,

as there would never be a need to fill and draw down the reservoir at the same time. The **additional pipeline was being added to future proof the design should the HWTWRP achieve consent**, with the application emphasising that this would reduce disruption to the local community if the effluent recycling project was to proceed. The company also highlighted that having 2 pipelines could be of benefit if one pipeline needed maintenance, but the primary driver was to provide a second pipeline that could carry recycled effluent to the reservoir. As in that scenario the recycled water would have to be moved too and mixed water returned from the reservoir everyday if the HWTWRP went ahead.

As the SW public consultation was running at the same time as the LPA consultation on the dual pipeline application (HBC ref: APP/24/00405), it was **clear that the design of the additional pipeline was already well advanced, and that the SW consultation running in parallel was not taking place at the formative stage of their plan.**

The overlapping of the two consultation periods caused considerable confusion to residents in the vicinity of the pipeline routes. It left those who supported the spring-fed reservoir but objected to the effluent recycling scheme in a quandary as to how to respond.

### **3.2 Failure to ensure the information provided was sufficient to give 'intelligent consideration'**

Insufficient information was presented by Southern Water in the consultation materials to enable informed consideration or judgement on the questions being asked. For example;

- a) In the 2021, 2022 & 2024 consultation brochures it was not clear which customers or communities would be impacted by receiving the recycled water. The overview maps were too generic for Southern Water customers and did not show that Portsmouth Water customers would receive the water (see Section 2, page 13). It was therefore not possible for those viewing the consultation to know if they would be impacted.
- b) There was no information in 2021 or 2022 to make customers aware that the recycled water might taste different.
- c) In 2022 when the public were asked if enough information was made available in the consultation for them to respond a large number (33%) of respondents indicated on the feedback form that the information was poor or very poor. In 2024 when asked if the consultation was promoted well and to the right people 58% indicated poor or very poor, and 30% did not think that the information was presented clearly.
- d) There was **no question in the consultation documents relating to whether people supported using Havant Thicket Reservoir as an Environmental Buffer Lake for recycled effluent, nor if they would prefer any of the other options**. No information was provided on the alternatives such as a discharge of recycled water to the lower River Itchen (or the River Wallington & Hamble as alternatives), storage in confined aquifers (as used in other countries), or **provision of a new environmental buffer lake nearer to Otterbourne**, closer to where the recycled water was needed in the Southampton/ Winchester area.
- e) No environmental information on the backup options including the HWTWRP was provided with the 2021 consultation.
- f) There was no information within the Summer 2022 consultation on the potential environmental impact of effluent recycling on the reservoir, or downstream water bodies, including Langstone Harbour. Southern Water had confirmed that they had not assessed or modelled the impact, yet they were still pushing ahead with this option.

- g) The Preliminary Environmental Impact Report (PEIR) provided with the 2024 consultation was not adequate or sufficiently robust to understand the likely significant effects on the reservoir, downstream water courses, Langstone Harbour (SPA, SAC, Ramsar, SSSI) nor the Solent.
- h) The Water quality modelling used to assess the impacts for the 2022, 2024 & 2025 consultations was inadequate to allow understanding of the impacts. For example, there was no modelling for key contaminants of concern such as pesticides, pharmaceuticals and forever chemicals (PFAS).
- i) In the Summer 2022 consultation SW asked respondents to comment on the process for option selection but they provided inadequate information for the average person to be able to answer that question in any meaningful way. Everything was presented at such a high level in the consultation that you could not actually tell what had been considered. For example, page 38 of the Scheme Development summary report refers to “*23 best value criteria and the application of the importance weighting to these*”, but the weighting was not explained.
- j) The Options Appraisal Reports, Strategic Environmental Assessment, Habitats Regulation Assessment and other key documents that supported the SW WRMP and provided details on the HWTWRP and other alternative options were classified as ‘restricted documents’ which were not accessible to the general public for the 2022 or 2022/23 consultation. SW refused to provide access to the documents locally (which is not in spirit of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009, 4 (3) (e), which requires documents for the project to be available for free in at least one address in the vicinity of the proposed development). Instead, SW insisted that concerned residents/ stakeholders travel to the SW Worthing HQ for a pre-booked visit 40 miles away, with a severely restricted time to view what are very large documents. For a representatives 2022 visit to Worthing a tiny room was provided with a very small wobbly table which was not fit for the purpose of 3 people trying to review large documents.
- k) The risks associated with construction of a Water Recycling Plant on a contaminated landfill site alongside Langstone Harbour (SPA, SAC, Ramsar, SSSI) were not adequately assessed and articulated. This applies to the 2021, 2022, 2024 & 2025 consultation.
- l) In Summer 2022 Southern Water asked people to comment on the process of site selection for the Water Recycling Plant (WRP) and High Lift Pumping Station (HLPS), but everything was presented at such a high level the public could not actually tell what had been considered. Information in **the previous Gate 2 reports was heavily redacted and as a result there was no transparency to the process. The scoring of options for site selection of the Water Recycling Plant & High Lift Pumping Station was not visible and available to challenge but looked really suspect given the preferred site selected.** For example, Southern Water state that the process took into consideration ecology, ground conditions and ground contamination, then selected a dilute and disperse actively gassing landfill site adjacent to the Langstone Harbour SPA, SAC, Ramsar site. That made no sense.
- m) In 2022 the provisional assessment of impacts on the marine environment did not even consider the potential impact on Langstone Harbour SAC/SPA from less spring water being pumped up to the reservoir, the compensation discharge flow from the reservoir to the harbour, nor emergency drawdown water. Nor did they consider the in-combination impacts such as whether nitrate values in the harbour would still be reduced. The Habitats Regulation Assessment screening was not adequately robust and did not cover these things

- n) No information was provided on how or where the loss of existing habitat at Broadmarsh (Site 72) will be mitigated for, even though part of the site is included in the Brent Goose Strategy, a material planning consideration for Havant Borough Council.
- o) It was still not clear even in the spring 2025 consultation where SW proposed to construct the pipeline tunnel shafts between the Water Recycling Plant and West Street, this information is needed for local residents to be able to judge the impact on local roads, homes, public open space and sensitive parts of the historic conservation area.
- p) There was a lack of detail for the 6 pipelines proposed even in the Spring 2025 consultation. For example, no information was provided on where pipeline washouts will be along the pipeline routes, including the 40km+ pipeline between Havant & Otterbourne that would be likely to discharge to streams including the protected chalk streams (Meon & Itchen). Sediment build up in the pipes will be a significant issue given the source of the water. Between Budds Farm sewage works and the Water Recycling Plant this is highly likely to be an issue due to the nature of the contaminated liquids the pipes will carry. Use of the washouts to clear the pipelines could result in discharge of contaminated liquid and sediment to a stream and/ or Langstone Harbour, unless there is an alternative to this.

### **3.3 Challenge to the timing and length of the consultation period**

#### **Was the consultation period adequate to give time for consideration and response?**

There is concern amongst the public and stakeholders that SW timed both the Summer 2022 & 2024 consultation to take place during the busy summer period when many people are away on holiday, or distracted by other activities (e.g. exams, childcare challenges for parents & grandparents).

*Non-statutory Summer 2022 Consultation HWTWR Project - 5 July to 16 August 2022*

*Statutory Summer 2024 Consultation HWTWR Project – 29 May to 23rd July 2024*

For example, the 2022 consultation ended on 16/8/22. Despite drawing this to the attention of the Company they refused to extend the period for the consultation.

All of the 2022 consultation online briefing events were held during the school summer holiday period.

The critical end period of the 2021 consultation coincided with Purdah, the pre-election period (which ran from the 25th March 2021 to 6th May 2021) during which time local councillors will generally refrain from making public announcements. A time when both councillors, local community leaders and activists would have been pre-occupied with the elections.

*Non-statutory Public Consultation 2021 - 8 Feb to 16 April 2021 (primarily on Fawley desalination)*

The HWTWRP is a very complex, multi-faceted proposal, with large numbers of documents, making it difficult to consider in the time available. Even community leaders/specialists concerned about the effluent recycling proposal found there was not time to read all of the documents related to the HWTWRP consultation and draft WRMP consultation documents.

A longer and better promoted consultation period would have been helpful for a scheme that will fundamentally change the source of our drinking water from just natural sources (rivers & aquifers)

to a mixed solution containing a very large percentage of water derived from sewage effluent. There was a lack of publicity about the consultation, most people found out about it by word of mouth or social media, leaving them little time to review the information and respond.

### 3.4 **Failed to ensure the product of consultation was conscientiously taken into account by decision makers**

The Planning Act Section 49 provides a 'Duty to take account of responses to consultation & publicity', unfortunately that has not been complied with.

- a) For the 2024 consultation SW made it very clear on page 66 of the brochure that responses could be made using the online feedback form, by email or letter. Yet when they analysed the responses SW have confirmed that they **ignored all of the 385 emails and 3 letters received** when collating the statistics for their summary consultation feedback report published in January. That is **a shocking 39% of responses that have been ignored, misrepresenting the feedback received.**

Despite this SW's 2024 summary feedback report admits that only 23% of the 563 counted responses from those who used the company's online feedback form supported the HWTWR Project. This is a very low number, but **the percentage supporting the scheme would have been very much lower had SW included the full set of responses**, since many of the discounted emails and letters are known to have been sent from those in the Water Matters<sup>1</sup> community who set out their objections to the project in more detail than the simplistic online feedback form would allow, believing the company assurance that free-format responses would be accepted. In fact, it is highly likely that most of the 388 uncounted responses were from those who wanted to object and express their concerns in writing.

Not including analysis of responses made by email and letter in the summary feedback report is extremely disrespectful to those concerned enough to respond. It provided a means for SW to hide just how unpopular the HWTWRP is.

The company indicated that although they had not taken the time to count the views of those who responded in writing, they did consider the written comments in the analysis. However, respondents from the Water Matters community (which includes Rowlands Castle Parish Council) did not feel that their comments or concerns had been adequately addressed.

<sup>1</sup> *The 'Water Matters' community brings together residents' groups, long-established environmental charities, and retired experts in water industry operations and ground contamination. Their concerns about effluent recycling are backed by a broad cross-section of parish and borough councillors.*

- b) There was a similar concern in relation to the 2022/23 draft WRMP24 consultation feedback report, when responses from objectors to the HWTWRP were hidden in a separate annex, concerns in the main feedback report were grouped together as 'themes', with whitewashed answers that did not address the concerns.
- c) Much concern has been expressed by respondents to the 2022 and 2024 consultation about SW's failure to undertake a robust options review and consider more sustainable alternatives to effluent recycling. Only desalination, effluent recycling and transfers were

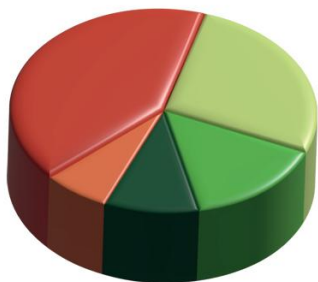
considered as backups in 2021. The 2024 feedback summary report page 10 acknowledges that the key issue raised was the need to look at alternatives, with the second most commented theme being a lack of trust in Southern Water.

The second pie chart below from the 2022 consultation feedback report shows that **46% of respondents did not support the options appraisal process** that SW went through to select water transfer and recycling as the proposed solution, in fact just 22% supported it. With the first pie chart confirming that 48% of respondents did not support water transfer and water recycling, with 10% neutral. This figure rose to 68% not supporting the HWTWRP in the 2024 feedback report, with a further 9 responses neutral.

There clearly is not public support for this option, but SW have not listened. **Yet the scale of the objection did not trigger a robust review of all potential options.**

## Water recycling

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



476 total respondents

- (27%) Strongly support the proposed solution
- (15%) Support the proposed solution
- (10%) Neither support or oppose the proposed solution
- (7%) Do not support the proposed solution
- (41%) Strongly do not support the proposed solution

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



419 total respondents

- (13%) Strongly support the options appraisal process
- (19%) Support the options appraisal process
- (22%) Neither support or oppose the options appraisal process
- (10%) Do not support the options appraisal process
- (36%) Strongly do not support the options appraisal process

Source: Extract of SW 2022 consultation feedback report

In 2023 following public objections to Defra and significant concerns expressed by regulators, especially in relation to inadequate options appraisal, the government did not approve the SW draft WRMP. Instead, Defra required further action to review the options.

It is very disappointing that the Company did not take the opportunity to start again, carry out a more realistic review of the demand deficit going forward, and undertake a more robust evaluation of potential solutions to bring forward a sustainable plan with more natural solutions supported by customers (see Section 8.2). Instead, SW focused on a limited review of a small number of options already in the draft WRMP24 to see if any could be brought forward more quickly, continuing to ignore more sustainable natural options. These would include moving river abstractions downstream to the tidal limits to reduce the pressure for abstraction reduction, addition of new aquifer storage options which they were already aware of but had parked for the future, or identifying new winter storage reservoir sites.

This provides a clear example of how SW have failed to take into account concerns and responses expressed by the public and even the regulators. Following ongoing expression of concerns by the Water Matters community and the regulators, SW are only now in 2026 finally starting to look at the other more sustainable options including moving abstractions and additional aquifer storage options. If SW had responded to concerns in 2022 more information would now be available to assess the options.

- d) In the Summer 2024 feedback report after each section analysis there is a blue box to summarise “How we are listening and what happens next”. If these sections are read, it will be seen that SW are not listening, as they are not proposing any significant changes or actions, it appears that they may just make a few tweaks to the pipeline route to address landowner concerns. For example;
- On page 15 of the feedback report there is no indication that they have recognised the constraints or the concerns about construction in the Old Bedhampton area.
  - There is no information on how many respondents specifically objected to the location of the Water Recycling Plant (WRP) at Broadmarsh in 2024, but 53% did not support the location of the ‘above ground plant’ which includes the WRP, with a further 33% not sure (page 13). In 2022 41% of respondents did not support the use of the Broadmarsh contaminated landfill site for the WRP. **Instead of addressing the concerns expressed about the risks of developing site 72 in both the 2022 and 2024 consultation SW have proceeded to purchase the site.** Alternatives sites with lower risks were available, including sites proposed by Havant Borough Council.
  - Page 18 confirmed 56% raise concern about environmental impacts with a further 25% not sure.
  - While SW recognise the concerns about energy & carbon, they just say on page 19 they will consider the impacts. That does not address the concern.

Public consultation is a fundamental part of the pre application process for a DCO. Its principal purpose is to raise awareness and seek stakeholders’ views to help inform the refinement of a Project prior to a DCO application being submitted.

While SW have made some tweaks to refine the project layout (e.g. to accommodate landowner concerns regarding the pipeline route), it is clear that despite significant objections and concerns expressed by the public they never had any intention of challenging the fundamental principle of the development, or aspects of the project such as; finding more sustainable and better alternatives, or locating a different site for the Water Recycling Plant and High Lift Pumping Station with less environmental risks.

**SW have not conscientiously taken into account the public responses to the consultation.**

#### **Section 4: Inadequate consultation to select an effluent recycling option in Hampshire**

The SW 2021 public consultation was not designed to select an alternative option to Fawley desalination and was not adequate to select effluent recycling via Havant Thicket Reservoir, or any other alternative option. Instead, a new consultation should have taken place when there was a material change to the SW's water resource plan in late 2021 before selecting a new preferred option. That did not happen, see Section 1.

#### **Why was the Southern Water 2021 Public Consultation completely inadequate to be used to select effluent recycling via Havant Thicket Reservoir as the preferred option?**

The 2021 consultation was not adequate to assess the preferred water resource options at the formative stage of the Southern Water (SW) plan, once desalination at Fawley was rejected. The justification for this analysis is set out below.

- The 2021 consultation was not intended or designed to be an option assessment or selection process. This is confirmed by SW in the consultation brochure (Ref 1) and the SW 2021 consultation feedback report (Ref 2).
- Potential back up options to desalination (including effluent recycling via Havant Thicket Reservoir) were not described in any detail, nor was any information provided on any of the backup options environmental impact to enable those consulted to provide informed comment.
- Regulators and Local Authorities indicated that they were unable to make informed or substantial comments on the 2021 consultation due to the lack of information provided on the alternatives. (see Appendix C, item 2 & SW 2021 feedback report - Reference 2 page 22).
- Not all alternative options were considered or included in the consultation. Other alternatives are only starting to be considered by SW in 2026 following pressure from the public and regulators.
- No information was presented as to which communities would be directly impacted by receiving recycled water at their taps. As a result, most communities in south Hampshire could not have known that the consultation was relevant to them.
- The 2021 consultation was solely online with a virtual exhibition space which was described by many respondents as difficult to navigate, excluding many who had no internet access or were not computer literate.
- There were no public exhibitions nor deposit of consultation materials in libraries or public buildings in communities that would be impacted, including RCPC. This is not in the spirit of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009, 4 (3) (e), which refers to the need for documents & maps for the project to be available for free in at least one address in the vicinity of the proposed development.
- The consultation was not actively promoted in local communities that might be impacted, not even to all Parish Councils, resident groups & environmental groups. For example, Rowlands Castle Parish Council were not consulted whose area includes part of the Havant Thicket Reservoir site, nor was Horndean & Clanfield Parish Council.
- There was just one press release about the consultation, with no second press release even when the deadline for responses was extended. That did not mention effluent recycling via the Havant Thicket Reservoir.
- The critical end period of the consultation coincided with Purdah, the pre-election period (which ran from the 25th March 2021 to 6th May 2021) during which time local councillors will generally refrain from making public announcements. A time when both councillors, local community leaders and activists would have been pre-occupied with the elections.

- Not all communities impacted were engaged in the same way, only the Fawley community were directly contacted by SW, as a result communities that would be affected by backup options remained unaware of the consultation, including communities in the Havant, Portsmouth and Rowlands Castle area.
- There was a strong bias to engaging with the Fawley community.
- Residents and stakeholders in the Havant, Portsmouth and Rowlands Castle area had no opportunity to make representations at the formative stage of SW's revised plan, when effluent recycling via the Havant Thicket Reservoir was selected as SW's preferred option in late 2021.

Further detail on why the Southern Water 2021 consultation was inadequate to support decision making on selection of an alternative effluent recycling option at the formative stage of the plan are set out in Appendix C.

Links to the supporting references are also provided below.

Reference 1- Water for Life Hampshire Consultation Brochure 2021

[Read the brochure we've produced for the consultation.](#)

Reference 2 - Water for Life - Hampshire Consultation Feedback Report, September 2021 Final Version

[Consultation feedback report](#)

**Section 5: Failure to take lack of public support and falling support for the HWTWRP into account**

There is a **lack of public support for the HWTWRP with 68% of respondents objecting to the scheme**, and support having fallen by 20% since the 2022 consultation. The scale of objection did not trigger a review of all potential options and has not been adequately taken in account.

**There is no public mandate for the HWTWR project even though the scheme will be funded by customers.**

In fact, the SW feedback reports illustrate that public support for effluent recycling via the Havant Thicket Reservoir and transfer to Otterbourne has actually fallen to less than 23% in 2024.

**Table 5.1 Summary of consultation findings in relation to support for effluent recycling**

Level of support	2022 Consultation %	2024 Consultation* %	Change in support %
Strongly support	27	12	-15
Support	15	11	-4
Neutral	10	9	-1
Do not support	7	11	+4
Strongly do not support	41	57	+16

Source: Compiled from SW consultation feedback reports for the 2022 & 2024 consultation

\* Note: SW have confirmed that they **ignored 39% of responses** (385 emails & 3 letters) received when collating the statistics for their 2024 summary consultation feedback report published in January. It is highly likely that most of the 388 uncouneted responses were from those who wanted to object to the HWTWRP and express their concerns in writing, as a result the true figure for the red and orange rows would have been higher. See Section 7.2 for further information. For example, we know that some of the longer emails were from local groups who did not support the HWTWRP and set out their concerns in more detail.

The table demonstrates that in 2022 and 2024 the majority of respondents to the consultation did not support effluent recycling via Havant Thicket Reservoir. It also confirms that support for the scheme has fallen, with 48% of respondents not supporting the scheme in 2022 rising to 68% in 2024, a further 9% were neutral or not sure. That is a 20% increase in those objecting to the project.

Figure 5.1 below shows the distribution of the 275 respondents who answered the SW question as to whether they supported the project and provided a postcode, where these were within the 'area of the project'. It clearly shows that objections were from across a broad area and not just close to Havant & Bedhampton where the infrastructure will be located (black dashed oval line on map). The larger number of responses from the Hayling Island, Emsworth, Rowlands Castle & Waterlooville areas reflect a greater awareness of the reservoir and HWTWRP in that broader area and confirms the lack of support over a wider area. That raised awareness is due to social media and in-person contact by concerned residents with family and friends sharing details of the consultation.

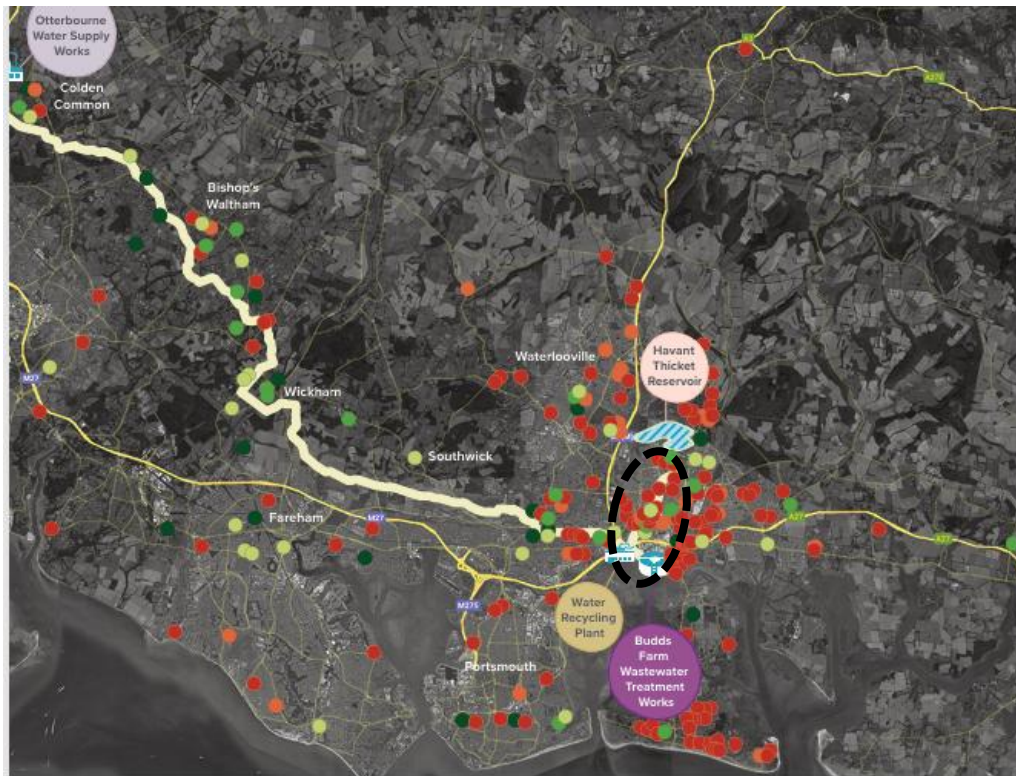


Figure 4 – Location of respondents supporting and not supporting the Project

**Figure 5.1** Source: SW 2024 consultation feedback report (colour key as for Table 5.1)  
 Black dashed oval shape reflects the zone of new infrastructure for the HWTWRP

The analysis of the 2024 statutory consultation shows that despite all of the SW one-sided consultation materials and PR on the positive aspects of effluent recycling the strength of feeling against the effluent recycling project has grown by 20% since 2022.

**It is clear from the responses that SW does not have a mandate from the public to pursue this scheme but they are not listening**

SW have made no attempt to publicise the 2021 consultation in the area most impacted by the HWTWRP, nor to customers who would receive the recycled water. They made very little attempt to publicise the 2022 and 2024 consultations. Despite this Table 5.1 demonstrates clearly that there is not public support for this option. The Water Matters community (including RCPC) believe that if the consultations had been more widely and appropriately publicised the response against the proposal in both 2022 & 2024 would have been much greater, especially amongst Portsmouth Water customers, who were largely unaware of the consultation, or that the proposals would impact them directly.

Note: Having failed to gain public support for the HWTWRP through the public consultation route we believe that SW are changing their approach to undertake small focus groups. This is where members of the public (sometimes paid to attend) are presented in small groups with a one-sided argument on the need for and benefits of 'water' recycling (having deliberately changed the name from 'effluent' recycling), then asking if they support the scheme. Water Matters are confident that if any such focus groups were presented with information on the advantages and disadvantages of effluent recycling in a balanced way, as well as potential alternatives, the level of support claimed from such groups would be less.

## **Section 6: Concern that SW have not been open and transparent**

Information presented by SW has not been open and transparent from before the scheme was selected in 2021 to now. Omission meant that it was not clear which communities would receive the recycled water at their taps. Key information was redacted or restricted at the time of the consultations to prevent open discussion of the options and impacts, and it has been difficult to get straight answers to questions submitted by the public. The company have been less than open about the risks associated with effluent recycling.

**The consultation was misleading by omission:** Under the Gunning Principles, as supported by the Local Government Association and the government's Consultation Principles, "sufficient information" must be provided to enable consultees to give "intelligent consideration" to proposals. It is unreasonable to expect residents or the Council to have identified the project's impact from the technical materials circulated. Because the applicant failed to clearly explain that the scheme would fundamentally alter the water source for Portsmouth Water customers, it was reasonable for both the Council and the public to assume they were not affected. A consultation process that requires stakeholders to "deconstruct" technical documents to uncover a significant change in their water supply is, by definition, a failure to provide sufficient information and a breach of the duty of candid disclosure.

**6.1 SW only give one side of the story to the general public,** keen to promote positives about effluent recycling but not the downside. For example;

- a) SW regularly and repeatedly described the output of the recycling plant during the consultations as providing 'pure' recycled water, without sharing the fact that it is demineralised, will contain some disinfection byproducts, as well as contaminants that get through the treatment process in small quantities. This includes pesticides, semi-volatiles and pharmaceuticals. Some PFAS 'forever chemicals' can also get through the treatment process and are of significant concern as they do not breakdown in the environment when discharged and can bioaccumulate in species including humans. There is significant concern both nationally & internationally regarding the health & environmental impacts of PFAS chemicals.
- b) Suggesting that the effluent discharged as reject water from the recycling plant into the Solent is the same as that previously discharged from the sewage works. When in fact it will be 4 times more concentrated and contain disinfection byproducts and a variety of chemicals routinely used to clean different elements of the Water Recycling Plant.
- c) When anyone challenged what was being said or tried to highlight negative aspects of the scheme they would be taken to one side by SW staff at public events. Some people even felt they were made to feel small when questioning what was being said by SW.

**6.2 Documents critical to understanding the journey of the scheme and option selection process have been redacted,** hiding information that is 'not security sensitive' from the public. For example;

In September 2020 SW submitted its Gate 1 report to Ofwat. The copy of the report subsequently placed on the SW website still confirmed that the base case selected option was Fawley desalination, with reference to consideration of 5 effluent recycling options. The summary document (page 11) refers to a 'new potential solution' but what it was is **redacted** in all of the

**Gate 1 documents.** It is highly likely that this was effluent recycling via the Havant Thicket Reservoir, as the text indicated it was not an option considered in WRMP19, and could be available by 2029, the same timescale for delivery as the Havant Thicket Reservoir at that time.

The SW Gate 2 documents published on the Company website in December 2021 were so heavily redacted as to be pretty meaningless. Despite repeated requests to give unredacted, or less redacted documents to stakeholders this was refused by Southern Water.

Information in the SW Gate 2 publications was impenetrable to the general public and stakeholders. The **bulk of the information on the options was redacted, with figures and tables relating to option B4 (HWTWRP) blacked out.** The extensive use of abbreviations in the documents would have made them very difficult for a lay person to read, with a 17-page key required for the abbreviations contained in a separate document. Members of the public who tried to look at the documents quickly gave up! (*perhaps that was what SW wanted*)

### **6.3 Documents critical to understanding the option selection process and environmental impacts of different water resource options were classified by SW as restricted.**

The winter 2022/23 draft WRMP consultation reports (including technical reports) that were published in the public domain were repetitive and provided only high-level information on the methodologies used, it lacked any detail and useful information to review and compare the alternative options. There was a lack of information in the public domain on options considered, scoring and weighting, the rejected options and why they were rejected? **Critical appendices containing the more useful information were all classified as restricted** on security grounds and not readily accessible to the public. Even the options appraisal was classified as restricted by SW, preventing any real scrutiny of the selection process.

Documents designated as restricted included the Options Appraisal, Strategic Environmental Assessment impact table/ scoring, and the Habitats Regulation Assessment for different options. This made it very difficult to find useful information to assess the different options, including finding information on options that had been rejected but might be viable. These documents were made available by other water company's when publishing their draft plans, indicating the SW decision to restrict these documents was unnecessary and unhelpful to delivering an open consultation.

Examples of how restricted documents were made difficult to review;

- i. When asked if restricted documents could be made available at SW offices in Hampshire, this request was refused, indicating that the documents could only be viewed by appointment at SW Worthing HQ in Sussex. Even then SW advised the documents would not be available until later in January 2023, despite the draft WRMP consultation having commenced on 14/11/22.
- ii. When members of the Water Matters community pursued the request for an appointment to view the restricted documents at SW's Worthing HQ giving in January, SW advised that the time allocated for the appointment would be limited to 2 hours, which was completely inadequate to view 7 large technical documents. On the day the time was stretched to 3 hours then representatives were asked to leave before being able to view all of the documents.
- iii. Despite having provided ample notice of our visit in January 2023 for 3 people to attend, a very small room with a wobbly table was allocated. This made it very difficult for those present to review the large and complex technical reports.

Having reviewed the restricted documents in both 2022 and 2024 it was difficult to see why the options appraisal and environmental assessment reports needed to be restricted. Members of the Water Matters community who had experience of security vetting documents could not see

information that warranted restriction of the documents, site names that were not generalised could easily have been made generic to enable the documents to be unrestricted. This is shown by the fact that other water companies made such documents available in the public domain.

The review of the restricted documents confirmed that they were critical to understanding the options appraisal process and should have been in the public domain.

- Viewing the restricted documents only reinforced the concerns about option selection being driven by profit, with environmentally damaging, high carbon options prioritised for selection. It was clear that environmental and carbon impacts were not being given adequate weight in the option selection process, contrary to the Paris Agreement and SWs own commitment to being carbon neutral by 2030.
- The **restricted documents confirm that other options are potentially viable** but have been kicked down the road for consideration in WRMP29 including; moving river abstractions to the final weir and multiple aquifer storage schemes.
- At the last draft WRMP consultation the EA required action by SW to include a summary of the options screening process, reasons for selection, and a narrative on reasons for rejection, but the SW response in the 'restricted' Annex 17, Appendix D tables was 'it's complicated'
- **Concerns expressed by regulators were hidden in restricted documents.** Scathing feedback from the regulators (EA & NE) on the first draft plan, especially in relation to the options evaluation, is hidden in the restricted documents, but remained valid for the revised draft plan. For example, statements recorded in the restricted Annex 17 (Appendix D) document relating to EA and NE responses on the first draft plan confirm that;
  - The EA & NE considered that alternative options have not been processed or presented correctly, so they did not know the grounds on which non-preferred options have been rejected.
  - "There is not enough detail on the justification of alternatives – there is a potential for less damaging solutions to be missed out and not carried forward".
  - "NE found it difficult to review options and determine whether assessment has been completed appropriately both at screening and appropriate assessment stage."
  - "NE have concerns about the SEA screening and conclusions".

None of these concerns seem to have been addressed in the revised draft plan. With the public unable to see the concerns expressed by the regulators due to SW classifying the documents as restricted.

**6.4 Misleading consultation materials have been provided, with no clarity as to which customers will receive the water.** From the maps in the 2022 and 2024 (page 9 & 17) readers would have no idea that;

- Most customers in SW's south Hampshire supply area will receive the recycled water, presumably including those on the Isle of Wight, to which there is a water transfer from Southampton.
- All Portsmouth Water customers will receive the recycled water. No indication at all on the maps or the text that they will be impacted by the proposed scheme.
- There is a proposal by SW to build a further pipeline to transfer the mixed water from the reservoir to West Sussex (Midhurst to Horsham)

Southern Water have not made all customers aware of the consultation. This is not acceptable when the scheme results in a fundamental change to everyone's water supply.

**All customers of SW & PW in the areas that would receive recycled water should have been notified about the consultation** through information sent out with bills, emails or direct mailing, as all will be impacted by the proposed change in the source of their drinking water.

6.5 **Information on the scoring for different options and sites, along with weightings used was not made available in public domain documents**, but given the options shown to be selected looked highly suspect.

6.6 Even in 2024 for the final revised draft WRMP there remained **inconsistency in costs, SEA scores, and population figures across the documents**, which completely undermined confidence in the SW assessment.

6.7 There was **no concerted ongoing publicity campaign for customers that would receive the recycled water, nor for the communities that would be most impacted by the planned infrastructure**, including Rowlands Castle residents, to make them aware of the consultation in 2022, or the public exhibition days. Instead, most people had to rely on finding out through word of mouth or social media. Publicity was also poor in 2024. As a result, most Southern Water and Portsmouth Water customers still remain unaware of the water companies plan for effluent recycling. Public notices/ posters should have been put up at sites affected for the period of the 2021 and 2022 consultation. As a result, the consultation cannot be considered to have been 'open' to all those impacted.

6.8 **Public exhibitions were only held in areas where new infrastructure is proposed, there was no attempt to cover other areas where customers would receive the recycled water.** For example, Chichester, Gosport, Southampton, Rowlands Castle, Winchester etc. Libraries in these wider areas where customers would receive the water did not have deposited copies of the consultation materials, including Southampton, Winchester, New Forest, Gosport, Chichester and Hayling Island. All drinking water customers who would receive the recycled water should have been notified, with consultation materials deposited in all communities to be impacted by receiving the water.

6.9 **Members of the public found it difficult to get a meaningful response to question in a timely way from SW**, when/ if they did finally get a response, it was often incomplete or vague, deflecting from the concern being raised. For example, after stakeholders were invited to visit a pilot effluent recycling plant at Budds Farm WWTW in late 2022/early 2023 they pooled their questions to make it easier for SW to respond to one person and sent them off on 24/1/23. While some responses were received in March 2023, final information was still being chased in June 2023. A comprehensive answer was not received to all questions.

6.10 **Rejecting an Environmental Information Request to receive a copy of the effluent recycling pilot plant data**, showed a lack of openness and transparency. The community had to appeal by requesting an internal view of the decision before finally receiving the summary data a year after it had originally been requested.

October 2023 – member of community requested the pilot plant data

23 November 2023 – community representative made it a formal information request

23 January 2024 – notified of decision made by Southern Water to reject request

Feb 2024 - community representative appealed against SW refusal to provide the data

29 July 2024 – no response, resent request for an Internal Review

8 Nov 2024 community representative finally received the summary data from the Head of Legal Services for the pilot plant the day before a scheduled meeting with the SW CEO

#### 6.11 **Not being transparent about partners, making it appear that a report is independent.**

SW have more recently published a report on their website called 'Reflections on Water Recycling Pilot Plant Performance' by University of Brighton. The report fails to acknowledge that Brighton University were working very closely with Southern Water on the project. In fact, Southern Water paid for their effluent recycling specialist to undertake a PhD at the University of Brighton specifically to review the performance of the trial plants. The report can not be considered an independent piece of research, and there is no reference to a source report for the data.

SW have failed to publish or provide a full technical report on the findings of the effluent recycling pilot plant trials despite requests in January and May 2026. Eventually SW claimed they had not produced a technical report on the pilot trials.

Delays to Environmental Information Requests are common.

#### 6.12 **Merging data from pilot effluent recycling trial plants located at 2 different sewage works is not appropriate and might serve to dilute the results for contaminants of concern.**

- The sewer catchments at the Peel Common and Budds Farm sewage works are not the same. About 16% of the raw sewage arriving at the Budds Farm sewage works is from industrial and commercial sources.
- The pilot plant operated at Peel Common for about 18 months, whereas it only operated at Budds Farm for about 8 months.
- Many contaminants of concern were found at much higher concentrations in the Budds Farm final sewage works effluent than they were in the Peel Common final sewage effluent. For example, the pesticides 2,4-dichlorophenoxyacetic acid and Atrazine.
- Some contaminants present at Budds Farm were not even found in the Peel Common samples. For example; pesticides (Dichlorprop & Isoproturon) and Volatile Organic Compounds (Benzo[a]pyrene, NDMA & Tetrachloroethylene)
- Peel Common has a significant issue with saline intrusion. The maximum recorded sodium level in the Budds Farm final effluent was 1,410,000ug/l (average 621,000 ug/l), whereas in the Peel Common final effluent it was a maximum of 201,000ug/l (average 143,000 ug/l)

While it is not made clear in the report summarising the findings of the pilot trial called 'Reflection on Water Recycling Pilot Plant' it would appear that the sampling data from both the Peel Common and Budds Farm trial have been merged before assessing the findings. There is a risk that this affects the results and gives concerns to stakeholders about transparency.

6.13 Stakeholders and customers are very concerned that there has been **no robust and transparent cost to benefit analysis for the HWTWRP** to demonstrate that it is the best value and correct option to select. The costs of the scheme have spiralled since it was selected in 2021 and there are significant concerns about the environmental impact of the scheme, which need to be transparently considered.

6.14 SW are very dismissive of the potential environmental impacts of the scheme, even though they have **not undertaken a robust assessment of the risks to water quality** in the reservoir, downstream water courses, Langstone Harbour, nor to the Solent from the discharge of 4x concentrated reject water. Technical specialists are concerned about the risks, and this leads to scepticism and mistrust.

6.15 Concern in relation to the 2022/23 draft WRMP24 consultation feedback report, when **responses from objectors to the HWTWRP were hidden in a separate annex**, concerns in the main report were grouped together in 'themes', watering down their impact, and whitewashed answers were provided which did not address the concerns raised.

6.16 The **scale at which maps were published in the 2022 consultations made it difficult to work out exactly where the new infrastructure was planned**. The different colour shading used to denote various things was not well chosen, as a result when layers overlapped, they were difficult to interpret. Larger copies of the maps with a clear key were not available to view at the drop in events, instead the public had to queue to sit at a computer with a member of SW staff to zoom in on the map detail. Some people left without getting answers to their questions/ concerns.

6.17 **Environmental impact information was not provided in a timely way**. It was not available for the 2021 consultation, nor the 2022 consultation. Despite assurances that it would be available for the 2024 consultation information on energy use/ cost and water quality were still missing.

6.18 The consultation documents for the draft WRMP and subsequent revisions were **vast, very repetitive and failed to provide important information, with key information restricted and inaccessible**. This made it very difficult for even a knowledgeable person to review these key documents for the selection of the HWTWRP. It made the consultation documents inaccessible to a lay person such as an average consumer or resident living near to one of the impacted sites.

6.19 For the Environmental Water Quality Report (Spring 2025 Consultation) **much information was missing on the assumptions, inputs and scenarios**. It was not clear who had completed the modelling or assessment. The method chosen to present the graphs hid the full range of results, and the screening process for determining which contaminants to include was not provided.

6.20 **Not transparent about their plans for a new pipeline which will extend the area in West Sussex across which customers will receive the recycled water**. SW have failed to make it clear that if the HWTWRP goes ahead they plan to build an additional new pipeline in 2040 from Havant Thicket across the South Downs to Pulborough, to carry the mixed water (which will include recycled effluent) from the reservoir to a SW treatment plant, from where it will be distributed to a wider area of West Sussex, including north to Midhurst and across towards Horsham. The customers over this wider area have not been made aware nor consulted.

## **Section 7: Concern that SW have misrepresented the facts/truth**

SW have misrepresented the facts/ truth including ignoring 39% of 2024 consultation responses in the analysis summary, in contradiction of the Planning Act Section 49 - Duty to take account of responses to consultations. Further examples are provided below.

**7.1 SW were not open about their plans for effluent recycling prior to the determination of the planning application for the original spring fed Havant Thicket Reservoir, despite recent claims.** It was certainly not true for SW (or PW) to claim as they have that information was shared openly and honestly at the time of the original reservoir planning application, or that much information was publicised by SW ahead of the original Planning Committees, with a consultation ending on 16/4/21. Statements like this just add to the mistrust in SW.

Active and informed local people in the Havant area were not aware of any consultation on SW's plans in 2021 until after it was over. There was no publicity in the PW supply area, nor at the reservoir site, even though both would be directly affected by the SW plans. In fact, having looked at the SW 2021 consultation document since, it was certainly not clear that PW customers would be impacted by any of the effluent recycling options being considered as a back-up to Fawley desalination, even though they would be. Nor that effluent recycling via the Havant Thicket Reservoir was in any way a preferred option. Appendix A provides a timeline to demonstrate this. Section 4 and Appendix C provide more information on the inadequacy of the SW 2021 public consultation.

**7.2 It was shocking to find that SW misrepresented the facts in their 2024 consultation feedback report by ignoring 385 emails and 3 letters.** This meant that 39% of the responses were not included in the summary statistics set out in the summary feedback report. This **resulted in inaccurate and misleading information being published** and showed a contempt for customers who took the time to respond. Even those that responded to each question asked in the consultation but did not fill in a feedback form had their response ignored. It is highly likely that most of those emails/ letters were from those who did not support the scheme and wanted to provide their reasons and set out concerns in more detail. For example, we know that some of the longer emails were from local groups who did not support the HWTWRP and set out their concerns in more detail.

Nor do members of the Water Matters community (including Rowlands Castle Parish Council) believe that all of the concerns they expressed under different question topics were adequately recorded and responded to in the summary feedback report. This has led to

**SW have failed to comply with their duty under Section 49 of the Planning Act** which imposes a Duty to take account of responses to consultation & publicity

**7.3 SW have not been open/ honest about the risk & impact of customers rejecting recycled water.** Trust in SW is at an all-time low due to SW's track record locally with coastal discharges, poor maintenance, telemetry failures, and £92 million in recent fines. The consequence is that SW are not trusted to run this complex treatment plant using technology that is new to the UK.

There is a real risk that this **mistrust in the company and of their recycling effluent will turn some people away from drinking tap water**, especially as the water will taste different. **This is not acceptable** and risks hitting those hardest in economic deprivation, and the most vulnerable in our society.

It also **risks creating a plastic drinking water bottle mountain**, with the increased environmental impact and costs of transporting full & empty bottles and disposing of the plastic. It is inevitable that some people will be turned away from tap water by effluent recycling due to lack of trust. Based on informal feedback received by the Water Matters community from friends, neighbours and relatives there will be a significant level of rejection. This will result in the need for increased manufacture, transport and use of plastic bottles in supply area, but it has not been included in the environmental assessment for development of the HWTWRP. This leaves the community concerned that SW are not taking this risk seriously.

Schemes in other countries have failed due to lack of public support. Post implementation research in other countries has indicated that although consumers may come to accept the need for effluent recycling as a solution and use the tap water for washing and bathing, some members of the public no longer drink the tap water. The impact of this change in the pattern of behaviour must be taken into account and the resultant impacts assessed.

This is why international case studies advocate the need to get customers onboard before pursuing effluent recycling. In Singapore where effluent recycling is now used 70% of customers use bottled drinking water and there is now a huge plastic recycling problem.

#### **7.4 Misleading information provided in the SW WRMP update email dated 14 June 2023;**

A misleading statement was made by SW about approval of the HWTWRP by regulators in a June 2023 email to stakeholders and those on their mailing list. The update stated that; *“the current preferred form of the scheme, recycling from Budds Farm into Havant Thicket Reservoir, was agreed with regulators in May 2022”*, giving the impression that this option was already approved and a ‘done deal’, even though the statutory public consultation process had not commenced (started 5/7/22 HWTWRP consultation, 14/11/22 for commencement of draft WRMP24 consultation).

The reality was that at Gate 2 the environmental regulators and Ofwat all raised significant concerns about the lack of progress on the assessment of environmental impacts for this option, the options appraisal process, lack of information on the alternatives, with Ofwat even challenging issues around value for money. Passing through Gate 2 only confirmed that the option was to be considered further.

- The update email was clearly intended to give the impression that SW’s plan for the HWTWRP had been approved when it had not. Only the funding for the next stage of the development had actually been approved.

This led to much confusion in the community, further distrust and frustration with SW.

#### **7.5 Information registered with the Planning Inspectorate and placed on their website is misleading;**

- a) Incorrect grid references for the scheme infrastructure. A truncated and incomplete location description.
- b) The project has been wrongly classified under the Dams & Reservoirs classification (WA01).

This is the wrong classification for the HWTWRP as there will be no changes to the Havant Thicket Reservoir infrastructure shown on the Development Consent Order application. The Water

Recycling Plant, pipelines and pumping stations to transfer the mixed water to Otterbourne will all be located away from the reservoir site.

Instead, **the project should have been classified as Wastewater Treatment & Transfer scheme**

**The wrong categorisation of the project under NSIP reduces transparency, undermines public trust and confidence in the process.**

**7.6 Misleading and dismissive statements on alternative options.** Page 10 of the 2024 consultation feedback report confirmed that the key issue raised by respondents was the need to look at alternatives. Water Matters have promoted storing more excess winter rainfall in confined aquifers (because less than 2% of rainfall is currently captured in the UK), as is proposed near the Testwood WTW. However, on page 11 of the feedback report SW claim that; “The issue elsewhere in Hampshire is that the aquifers are not confined – i.e. the water would simply flow away”. This is very misleading as the SW restricted options appraisal documents confirm that SW have identified many aquifers in both Hampshire, West Sussex and the Isle of Wight where they could be investigating aquifer storage.

SW have repeatedly been dismissive about this and other alternative options at public events, pressing their assertion that the HWTWRP is the only option. However, it is important to note that SW have committed in 2025/26 to exploring more sustainable options following meetings with regulators and the Water Matters community (including Rowlands Castle Parish Council).

**7.7 There has not been input from all relevant stakeholders from the beginning.**

Figure 2022 on page 52 of the 2024 consultation brochure (EIA Section) indicated that there had been input from stakeholders from the beginning. However, the Havant community and Havant Thicket Reservoir stakeholders have not been involved from the beginning

- a) The Havant community (e.g. councillors) and Havant Thicket Reservoir stakeholder group members were not even made aware of HWTWRP in 2021 when it was selected and the initial environmental assessment screening was completed. Nor of the 2021 public consultation where the existence of a back up option for effluent recycling via the Havant Thicket Reservoir was first mentioned. This is despite a Havant Thicket Stakeholder Group having existed since 2004 and meetings taking place in 2020/21.
- b) Local stakeholders were not even permitted to comment on the EIA Scoping for the HWTWRP, with the exception of Rowlands Castle Parish Council.

**7.8 SW claim to have support for ‘effluent recycling’ from the previous consultation in 2021, but this was not specifically for the HWTWRP.** The claim is misleading as the selected option in that consultation was the unpopular and equally environmentally unfriendly Fawley desalination scheme. The findings of the public consultation had a significant bias because a large proportion of the people (38%) who were directly engaged by SW in the consultation process lived close to the proposed Fawley desalination plant. SW Gate 2 HT Report, Page 35, confirmed that;

- 60% of people agreed that water recycling alternatives would be acceptable.
- 30% disagreed or disagreed strongly (28% neither agreed nor disagreed)

- 38% of those people responding lived close to the base case (desalination) and most did not support desalination. They are likely to have supported any alternative, including effluent recycling, without having any understanding of the potential impacts, as no details on any of the effluent recycling options were provided in the consultation.

The findings from the February 2021 consultation cannot be used to justify the selection of HWTWRP, as that was not the purpose of the consultation, and because it provided insufficient detail to make informed judgement on any of the other alternatives mentioned as potential backup options.

## **Section 8: Other concerns relevant to the consultation**

A broad range of other concerns are listed below, with more detail set out on each in the sub-sections that follow.

- 1. The Adequacy of Consultation Milestone Report (October 2025)** published on the SW website does not adequately reflect the deficiencies in the consultation process.
- 2. Not taken account of customer research that** has shown a clear preference for more natural water resource solutions such as aquifer storage, reservoirs & catchment management.
- 3. Failure to make information on the consultation website clear.**
- 4. Failure to set up an effluent recycling stakeholder sub-group with reservoir stakeholders.**
  - The HWTWR project is a lose-lose option for Portsmouth Water customers and stakeholders
- 5. Failure to consult** on whether customers are prepared to drink recycled water & SW not taking into account the impact of customers rejecting their tap water for drinking.
- 6. Misrepresenting the findings** of national research on attitudes to water recycling.
- 7. Claims made by Portsmouth Water of 7 in 10 support for water recycling are not sound and are being used out of context.**
- 8. Legislation and national guidance is not in place to provide adequate control.**
- 9. Setting a national precedent for the way forward without having a national debate.**
- 10. The daily operating volume of the HWTWRP has changed substantially since selection, as has its resultant environmental impact, but the options appraisal has not been revisited.**
- 11. The scale of the objections to the HWTWR project** has not triggered a review of the options.
- 12. The scale of objection and concerns with respect to the proposed Water Recycling Plant site has not resulted in SW relocating the plant,** even though there are other potential sites in the area with a lower environmental risk/ impact.
- 13. SW acknowledged that the inadequate opportunity for consultation and scrutiny results in the risk of a public inquiry & delays.**
- 14. It was not made clear in the Summer 2022 consultation that Southern Water would not be applying to the Local Authority for planning permission to discharge recycled effluent into the Havant Thicket Reservoir.**
  - Many people have told Water Matters that they feel misled and would not have supported the original reservoir planning application if they had known the reservoir could be used for effluent recycling.
- 15. No information to indicate that people from ethnic groups or religions have been consulted,** who may have a spiritual or moral objection to drinking recycled effluent.

**8.1 The Adequacy of Consultation Milestone Report (October 2025) published on the SW website does not adequately reflect the deficiencies in the consultation process.** This includes;

- a) Misrepresenting the adequacy of the consultation.
- b) The report does not acknowledge that SW failed to
  - Follow the statutory consultation process set out in the Water Industry Act 1991 (Section 37 A & B) when their plan material changed from the Fawley desalination option.
  - Undertake a robust review of all alternative options after their WRMP19 plan failed and before selecting the HWTWRP.
  - Undertake a new consultation on the revised options/ plan before selecting the HWTWRP.
  - Directly engage with customers and residents likely to be impacted by the selection of effluent recycling via the Havant Thicket Reservoir, before finalising their selection. In complete contrast to the way they proactively engaged with the Fawley community via the 2021 consultation before rejecting that option, including extending the consultation period to allow more time for Fawley residents and stakeholders to respond.

(Further information on the inadequacy of the 2021 consultation is provided in Section 4 and Appendix A and C).

- c) The report fails to recognise the lack of support for the HWTWRP (see Section 5)
- d) Fails to recognise that support for the scheme declined between 2022 and 2024 (see Section 5)
- e) Consultations have not followed the Gunning Principles (see Section 3), including failure to engage with those most likely to be impacted at the formative stage of the plan.
- f) The report does not acknowledge that SW misrepresented the findings of the Statutory 2024 consultation by ignoring 39% of the responses in the summary analysis (see Section 3.4a & 7.2)

**8.2 Not taken account of customer research which has shown a clear preference for more natural water resource solutions such as aquifer storage, reservoirs & catchment management** Customer research by SW and across the industry has shown that desalination and effluent recycling were the least preferred options with concerns about their environmental impact, greenhouse gas emissions due to high energy use, and for effluent recycling concerns about water quality. This was confirmed in SW's own draft WRMP24 summary report (2022, page 21) which indicated that effluent recycling was low in the choice of preferences, with concerns about the cost, potential environmental impact in terms of energy and waste production, with further assurances needed around water quality.

- a) Despite stating that customer feedback has been taken into account the options selected by SW in WRMP24 for both the short and long-term are dominated by effluent recycling and desalination schemes. This shows that customer feedback was not adequately taken into account.
- b) Unfortunately, customer preferences have also not been accurately reflected in the SW Options Fact File (Annex 13 – *restricted document*), with effluent recycling schemes scoring almost the same as aquifer storage, despite the findings of customer research to the contrary.
- c) SW draft WRMP24 (Annex 6, 2022) confirmed on page 17 that customers felt strongly that reductions in risk of emergency drought measures needed to be achieved via sustainable investment and protecting the environment.

By selecting effluent recycling as a drought resource **SW are ignoring this feedback from their customers, as the HWTWR solution is not sustainable.** It must operate 365 days a year even

when it is not needed (as it was selected as a drought resource) and is not located close to where the water is actually needed.

**8.3 Failure to make information on the consultation website clear;** The SW website page for the Summer 2022 consultation gave the impression that you needed to register to view materials, which was not the case, this may have put some people off looking at the consultation materials and responding.

- Some users reported that they found the SW website very difficult to control. Water Matters repeatedly received requests as to where to find the consultation documents.
- For the Spring 2025 consultation many people told Water Matters that they could not find information and documents on the website, including the feedback form. This may have discouraged the public from responding. Added to this the online feedback form was not user friendly, only allowing use of very basic text.
- For the spring 2025 scheme design change consultation the 2024 and 2025 maps should have been displayed side by side to make it easier for residents to see the changes and compare. The shaft locations should have been shown on each map, along with an indication as to whether it would be a 'driver' or 'receiver' shaft, as that makes a significant difference to the environmental and community impacts.

**8.4 Failure to set up an effluent recycling stakeholder sub-group with reservoir stakeholders;** The intermittent attendance of a SW Comms Officer at the Portsmouth Water Havant Thicket Reservoir stakeholder meetings to provide a short update presentation on what they were doing in relation to the HWTWRP was not genuine consultation, as there was no real opportunity or time allocated for engagement. Note that SW rejected the request from those reservoir and community stakeholders in 2022 and 2023 for a separate stakeholder sub-group for effluent recycling to be able to discuss the proposal and their significant concerns in more detail.

**The HWTWR project is a lose-lose option for Portsmouth Water customers and stakeholders.** They lose key biodiversity benefits of the reservoir, must put up with all the disruption and significant changes to the landscape resulting from the original reservoir development, then those associated with the HWTWRP construction, and end up being supplied with SW's recycled effluent via the reservoir for their drinking water (instead of spring water). They also lose the benefit of security of supplies without the development of other resources, as the reservoir should have provided sufficient water to meet the long-term needs of Portsmouth Water beyond the current planning horizon.

**8.5 Failure to consult on whether customers are prepared to drink recycled water & SW not taking into account the impact of customers rejecting their tap water for drinking**

Consultation **feedback on the HWTWRP has been predominantly negative**, with one of the main concerns raised by respondents being about drinking recycled water. Page 9 of the 2024 consultation feedback report confirmed concerns with drinking recycled water related to a change in taste, the presence of forever chemicals, and this **driving consumers to choose bottled water instead**.

a) No opportunity has been provided to customers to comment on whether they will be prepared to drink the recycled water. There were **no questions in any of the consultations about whether customers would be prepared to drink the recycled water**. This was a missed opportunity to get meaningful feedback on this important issue.

b) Case studies from drought-stricken countries around the world make it clear that it is essential to get the community on board before progressing with effluent recycling for drinking water. **SW have made no effort to get the community who will have to drink the recycled water on board.** There has been no direct mailing to customers about the consultations regarding the selection of effluent recycling or the HWTWRP. In fact, SW have indicated in a submission to Ofwat (2024) that **customer engagement is not planned until 2033, when it will be far too late for customers views to be taken into account.** This is contrary to international good practice.

c) **Large numbers of customers (SW & PW) have indicated to the Water Matters community that they will not drink the recycled water, they will buy bottled water instead** if the proposal goes ahead, as they do not trust SW with this complex technology.

**Yet no information has been presented by SW on the environmental impact of a percentage of customers turning to bottled water** as a direct result of the implementation of the HWTWRP. **Nor have the socio-economic impacts been considered if frail, vulnerable, elderly, families or those financially challenged feel the need to turn to bottled water.**

- The adverse environmental impact of manufacturing, transporting and disposing of millions more plastic bottles a year must be considered. Many of which will not be recycled after use, but will end up in our streets, parks, rivers and at our coast. This should have been considered as an indirect impact of effluent recycling (environmental & cost).
- If consumers reject the water there is a cost impact for struggling families, the elderly and most vulnerable in our society. Water is essential for health, if consumers reject tap water it is likely that they will either drink less water, or select unhealthy alternatives, especially if they are cheaper than bottled water. This has not been considered in the impact assessment to date.

SW have advised Ofwat that they do not propose to engage with customers until 2033, when it will be too late to influence the outcome. This is not acceptable and is wholly inadequate.

Note 1: Rejection of drinking water is a criterion for determining if water is wholesome under the UK Water Quality Regulations.

## **8.6 Misrepresenting the findings of national research on attitudes to water recycling**

The water companies have claimed at public meetings that research funded by the Drinking Water Inspectorate (DWI) on attitudes to water recycling shows that there is 79% support for recycled water being used to supplement public water supplies.

### Public Perception of Water Recycling for Drinking Water Use - Drinking Water Inspectorate

However, reading the December 2022 report it is seen that SW (and PW) have used the findings out of context to suggest that there is widespread public support for effluent recycling. The reality is that the DWI funded research was undertaken as a 'social science study of public perceptions', including to assess the impact of providing different information and then seeing how responses changed. There were five survey groups with different manipulated variables. For example, one of the objectives was to 'Establish the impact of information and education with respect to public acceptability of water recycling. Assessing the journey from uninformed to informed'. This included changing the terminology used for effluent recycling that was found to have an effect. They found that if you refer to it as water recycling and present positive information about the need for effluent recycling, that it is safe and used in other countries, then more respondents indicated support. Whereas, if you used words that showed the link to waste water or sewage there was less support. Trust was not included as a variable in the quantitative survey research, although the report

acknowledged this as a key factor. Slightly fewer respondents indicated they would be happy to drink recycled water, with 29% indicating the idea was disgusting. The online interviews were undertaken between July and September 2022 with just 1,618 respondents and only 15 follow up interviews. Most respondents (65%) said they knew little to nothing about water recycling.

- This report does not form a sufficient evidence base on which to claim that the majority of the public support effluent recycling.
- It could be argued that it shows that most people don't know enough about effluent recycling to make an informed decision.
- It certainly can not be used to show support for any specific effluent recycling scheme. When the potential for effluent recycling becomes a reality in your area then survey findings may be different.

Note: SW had already changed their terminology from use of effluent recycling to water recycling by 2022.

### **8.7 Claims made by Portsmouth Water of 7 in 10 support for water recycling are not sound and are being used out of context**

The PW Wave 1 survey took place in March 2022 which was well before most customers were even aware that effluent recycling via the Havant Thicket Reservoir was planned by Southern Water, or of the concerns raised by the community about it. The survey was not primarily undertaken to establish support for the HWTWR project.

It was a very limited survey of 700 self-selected customers; the panel was not representative of the demographic of PW customers (<0.1%). The panel made clear their concern about environmental impacts (73%), energy use and carbon emissions (52%) generally, but were not told about these impacts in relation to water recycling. They were given limited information on water stress, the need to protect chalk catchments, and the need for new water resources before responding.

**The survey found that water recycling was the second least favoured option at 70%, with even desalination being more popular (73%). Other solutions had a much higher level of support including reducing leakage (96%), a new reservoir (84%), use of grey water (80%) and universal metering (73%) all were more popular.** This survey cannot be used to claim 7 in 10 support for effluent recycling via Havant Thicket Reservoir (HWTWRP). The survey actually showed that water recycling was the second least popular option to meet their customers water supply needs going forward.

### **8.8 Legislation and national guidance is not in place to provide adequate control**

Concerns about control of contaminants of concern is valid as the legislation is not currently in place in England to enable control of the discharge of contaminants such as pharmaceuticals, pesticides and forever chemicals into the river or reservoir that will be the environmental buffer for any scheme. This has been confirmed by Ofwat & the Environment Agency at a meeting on 31/7/25.

The Drinking Water Inspectorate has confirmed that they will not regularly or routinely inspect effluent recycling plants because they discharge into the environment.

In other countries that use effluent recycling there are controls in place that require;

- Risk assessment and ongoing regular review of all industrial and commercial discharges into the sewer catchment of an effluent recycling plant.

- Controls at source on hazardous chemicals discharged into the sewer catchment with ongoing checks and reviews.
- Regular audits by experts and community representatives of Water Recycling Plants, their inputs and outputs, with open sharing of all findings to the public.

No such mechanisms are in place in England to achieve the necessary controls which will be essential to develop public trust in recycled water, particularly given the current low level of public trust and confidence in the water companies, especially Southern Water.

### 8.9 Setting a national precedent for the way forward without having a national debate

The HWTWRP is the first effluent recycling scheme to go through the development and application process using treatment technology which is new to the UK for public water supply. If it is granted consent, it will set a precedent, as there are many other water companies who have effluent recycling schemes in later parts of the WRMP programme that will then come forward, regardless as to whether this is the best solution to meeting the countries water supply needs.

Yet there has been no national debate, nor discussion, on whether this unsustainable and expensive solution, which must operate 365 days a year is the best way to meet England's water supply deficit, especially if selected as a drought resource. With less than 2% of rainwater in the UK captured for drinking water, and a forecast increase in winter rain as a result of climate change, surely there is a better more sustainable way to meet our water supply needs that should be considered first.

A very significant 'Material change' is taking place to customer's water supply with the source changing from river, spring or groundwater to recycled effluent. If this is to set a national precedent surely as a minimum SW should be required to proactively engage with all of the customers impacted to get their feedback, before the final decision is taken on pursuing effluent recycling in Hampshire.

A precautionary and thorough approach is needed to consultation before the scheme sets a national precedent, at present there has been inadequate consultation with consumers to be impacted.

### 8.10 The daily operating volume of the HWTWRP has changed substantially since selection, as has its resultant environmental impact, but the options appraisal has not been revisited.

Initially the community were told the Water Recycling Plant and transfer would need to operate at 5MI/d for 365 days a year, even though it was selected as a drought resource to keep the system operating correctly. The volume subsequently rose to 7.5MI/d, then 15MI/d, with the latest figures suggesting daily operation at between 20 and 30 MI/d. This change in from in volume from 2 to potentially 12 Olympic size pools of water per day is very significant. That makes an enormous difference to the energy requirements of the recycling plant and pumping stations, with a knock-on impact to cost, carbon and greenhouse gas emissions.

a) This significant change must invalidate, or at least bring into question, the initial options appraisal and environmental impact assessment process as critical aspects like cost (which have spiralled) and greenhouse gas emissions have changed substantially since 2021.

b) The huge energy use and carbon emissions make this an unsustainable option. To comply with the Paris Agreement on Climate Change if a lower emissions alternative (or combination of

alternatives) is available that should have been explored. Selecting this option is also contrary to SWs commitment to be operationally carbon neutral by 2030.

Despite repeated requests to provide information on energy use and operational costs this information was not forthcoming. The local community most impacted by this scheme were assured that information would be provided during the summer 2024 consultation on the project's energy use, and trial recycling plant data, but neither were provided.

#### **8.11 The scale of the objections to the HWTWR project has not triggered a review of the options;**

- Only 180 responses were received to the 2021 consultation, with 62% not supporting the selected desalination scheme, which contributed to the Fawley desalination scheme being rejected.
- There were far more responses to the HWTWRP in both 2022 (571 responses) & 2024 (900+ responses) with 68% (2024) not supporting the project, yet this did not even trigger a robust options review.
- 39% (388) of responses to the 2024 HWTWRP option have been ignored in the summary feedback report, most of which are likely to have been from objectors. That is more than the total number of 180 responses received to the 2021 Fawley desalination consultation.
- It is likely that most of those in 2021 who did not support the Fawley desalination option would have indicated support for effluent recycling as a solution without understanding any of the implications, as no information was provided. SW should not be using the 2021 consultation findings to justify the selection of the HWTWRP.

#### **8.12 The scale of objection and concerns with respect to the proposed Water Recycling Plant site has not resulted in SW relocating the plant, even though there are other potential sites in the area with a lower environmental risk/ impact**

In summer 2022 41% of respondents did not support the proposed location of the Water Recycling Plant (WRP) at Broadmarsh (Site 72). The lack of public support for the site is not even mentioned in the subsequent consultation documents. The site is a former contaminated landfill and there is concern from the public, councillors and a Water Matters technical advisor that the WRP development along with its associated tunnels and pipelines will pose a significant risk to Langstone Harbour.

In 2022 it was far from clear how all of the potential impacts had been assessed because the scoring/ rating of different alternative sites was not provided. The community are concerned that the risks associated with the landfill were not adequately considered, and that other sites have been dismissed too quickly and some of the reasons that sites have been rejected are not sound.

Following repeated requests over several years to SW their more detailed alternative site review report was finally provided to the Water matters community in 2025. This showed that there was no robust scoring for the assessment of alternative sites, a simple 3 colour code high level traffic light scoring system was used, which was inadequate to highlight and compare the risks of developing the WRP on different land parcels. Provision of the alternative site assessment report has reinforced concerns about the inadequacy of the site selection process. It is of significant concern that the mitigation hierarchy design principle has not been followed when selecting Site 72, as significant risks/ impacts have not been avoided or minimised.

**If the effluent recycling scheme is to go ahead, then an alternative lower risk site must be found for the Water Recycling Plant.** Havant Borough Council have suggested alternative sites.

### **8.13 SW report acknowledged that the inadequate opportunity for consultation and scrutiny results in the risk of a public inquiry & delays**

It is clear that customers and residents who will be impacted most by the proposal for effluent recycling via Havant Thicket Reservoir have not been given the same opportunity to comment on the options appraisal as other communities, as this option was not selected until the end of the Gate 2 process (Dec 2021). The community who would have been impacted by the desalination proposals at Fawley had years to make representations and raise concerns, and SW have now rejected the proposal for desalination. That opportunity was not afforded to those in the vicinity of the Water Recycling Plant, reservoir and 40km pipeline. SW highlight in their own documents

*The need case for an alternative solution is not beyond challenge because it does not explicitly feature in WRMP19 as being a preferred solution to meeting the agreed supply deficit (SW Gate 2 Annex 3, Page 226)*

*SW confirm in various places in the Gate 2 documents; This Option is not part of the long-term scheme for alternative water resources set out in WRMP19. If this Option were selected SW would expect to undertake an update of WRMP19 on the basis of there being a 'material change in circumstances', so as to include this Option in an updated WRMP19 (SW Gate 2 Annex 5, page 268).*

### **8.14 It was not made clear in the Summer 2022 consultation that Southern Water would not be applying to the Local Authority for planning permission to discharge recycled effluent into the Havant Thicket Reservoir.**

Many people believed that as the current reservoir construction was granted planning permission to fill the reservoir with spring water, a new planning application will be required before the recycled effluent could be discharged, and at that time they will then get their opportunity to comment and object. Indeed, that is what the LPA Planning Officer assured objectors and councillors at the planning committee meeting where the decision was made to grant permission for the reservoir. He specifically gave an assurance that councillors did not have to consider the risk of the reservoir being used for recycled effluent because that would require a new separate planning application and Environmental Impact Assessment.

While the 2024 consultation brochure did refer to an application for a Development Consent Order, the majority of people will not understand what this is, nor that it is to be made instead of applying for planning permission from the LPA. As a result, they may not have understood the importance of responding to the consultations.

**Many people have told Water Matters that they feel misled and would not have supported the original reservoir planning application if they had known the reservoir could be used for effluent recycling.** They feel SW have hijacked the reservoir for their effluent recycling scheme.

### **8.15 No information to indicate that people from ethnic groups or religions have been consulted**

Some ethnic groups could have a spiritual barrier, moral or other concerns in relation to reusing treated wastewater to derive water for drinking and washing. For example, haram issues for the Islamic community. It will be important for Defra, local authorities and the Planning Inspectorate to understand what has been done to engage with these often harder to reach groups.

## Appendix A

### Appendix - Timeline which illustrates lack of adherence to the Statutory Consultation Process by Southern Water

The timeline of events shown below demonstrates, the statutory consultation process on Southern Water’s material changes to their Water Resources Management Plan has **NOT** been followed. As a result, there has been inadequate opportunity for those impacted by changes to the plan to consult on new options being selected at the formative stage of the plan revisions, including the selection of the effluent recycling via the Havant Thicket Reservoir (HTR) as a preferred option in 2021.

Timeline Reference	Key points in the Southern Water’s consultation timeline - description and concerns noted
1	Effluent recycling via the Havant Thicket Reservoir <b>was not an option</b> considered in WRMP19.
2	RAPID Gate 1, Sept 2020, provided confirmation that an un-named new solution was to be included as a potential additional solution. <i>(This is Likely to have been effluent recycling via HTR.)</i>
3	<p>Public Consultation 8 February – 16 April 2021 - Confirmed that the base case selected option was still for a desalination plant near Fawley, with 8 different potential back-up options named, including effluent recycling via HTR.</p> <p>Consultation confirmed that the previous WRMP19 selected back up option of Budds Farm effluent recycling with the recycled water being discharged to augment the River Itchen had been rejected.</p> <p><i>This consultation was <u>not</u> publicised in the Portsmouth Water supply area where consumers would be impacted if the potential alternative option were to be selected.</i></p>
4	<p>A national newspaper article on 5 May 2021 referred to the Southern Water proposal for effluent recycling via HTR as a backup water resource option.</p> <p><i>This was the first time any customers in the Portsmouth Water supply area had become aware of the Southern Water proposal involving the potential use of HTR for effluent recycling, however, it was too late to raise any objection since the consultation had closed on 16 April 2021.</i></p>
5	<p>In Sept 2021, Southern Water confirmed that the Fawley desalination option had been rejected <i>as it could not be consented</i>. At the same time, the Company confirmed the decision that the backup option of Budds Farm effluent recycling with recycled water discharged to augment the River Itchen was <u>not</u> deliverable. <i>This decision was not publicised at this time.</i></p> <p><i>Note: Because both Southern Water’s selected and backup WRMP19 options had now been rejected, representing a ‘material change’ to the SW plan, due process should have been for a review of <u>all</u> the potential options with a new public consultation.</i></p> <p><b><i>This is a statutory requirement when there is a material change to the WRMP and it did not happen.</i></b></p>

Timeline Reference	Key points in the Southern Water’s consultation timeline - description and concerns noted
6	<p>Southern Water’s WRMP19 Annual Review 2020-21 (December 2021).</p> <p>This document confirmed that planning permission had been granted for the <b>spring fed</b> HTR and referred to Southern Water having identified an option for recycled water to fill HTR and provide a resilience benefit.</p> <ul style="list-style-type: none"> <li>• Page 57 sets out <u>legal requirement to reconsult on WRMP19 if there is material change</u> proposed.</li> <li>• Page 58 sets out a fragile an easily challenged justification for <b>not</b> re-consulting when their selected options failed.</li> </ul> <p><i>Note: There was no robust review of all of the options and <b>no further public consultation</b> at this formative stage of the plan when effluent recycling via HTR was selected.</i></p>
7	<p>Southern Water’s Gate 2 submission (December 2021) confirmed that the company’s selected option was effluent recycling via HTR with a volume of 15ML/d.</p>
8	<p>Ofwat consultation on funding (1 March 2022) to investigate the effluent recycling via HTR project.</p> <p>Ofwat proposed to impose a 10% incentive penalty. Some of the reasons given by Ofwat were;</p> <ol style="list-style-type: none"> <li>1. There had been insufficient stakeholder engagement, particularly with customers who will receive the recycled water.</li> <li>2. Insufficient progress made in carrying out key environmental assessments (SEA,HRA,WFD)</li> <li>3. Insufficient environmental monitoring data to understand the impacts &amp; risks</li> </ol>

This timeline shows that **Southern Water was neither open nor honest** in the information shared by the company with the public, customers or stakeholders about plans for effluent recycling via Havant Thicket Reservoir **at the formative stage of the plan in 2020/21 when the decision to select this option took place.**

Other points worth noting:

- Southern Water customers & the Fawley community had years to engage and feedback on the company’s proposal for desalination at Fawley in response to both the 2014 & 2019 WRMP, but the Havant community had no opportunity to comment on selection of effluent recycling via Havant Thicket Reservoir before SW selected that as their preferred option in 2021.
- The documents that were published in 2020/21 on the Southern Water website were often heavily redacted to camouflage any references to Havant Thicket Reservoir.
- It was not clear, even in the SW Summer 2022 consultation, that water from the effluent recycling scheme would be received at the taps of Portsmouth Water customers.

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Abbreviation ‘HTR’ refers to the Havant Thicket Reservoir

## **Appendix B: Inadequate Signage – 22 July 2022 (Summer 2022 Consultation)**

No posters at the 9 entrances to the reservoir site where Portsmouth Water regularly put public notices.

No posters at the Water Recycling Plant site, nor along the pipeline route.

After a complaint about the lack of posters SW indicated some posters had been put up.

Nearest A4 poster found was a 10-minute walk from the reservoir site, second poster a 15 minute walk.

Two poorly located posters were eventually found, the nearest was at Staunton Country Park (SCP) car park pay station (see below). Most people entering SCP from the Coach House car park entrance will not visit the reservoir site, so why put it here? Why not at the well-used entrances to the Havant Thicket reservoir site?



Photo of the poster closest to the reservoir site at the SCP Coach House car park pay station (photo above) – A4 blue SW poster hanging at an angle behind the parking meter, only 2ft off the ground and held with one drawing pin. Very easy to walk past and not notice the SW poster. No one was seen looking at the poster.



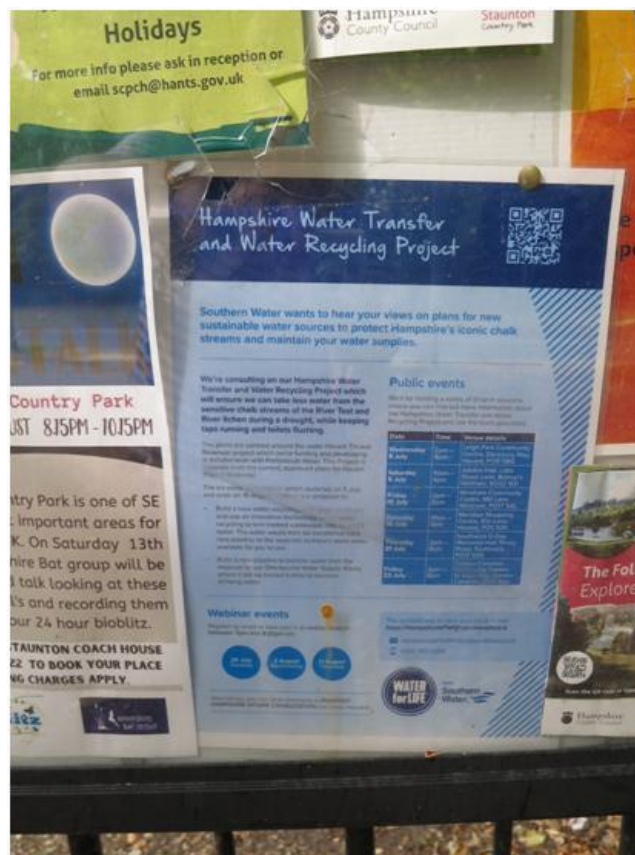
This public notice board just 10m away from the pay station alongside the main SCP access path from the car park had no Southern Water poster about the consultation. People were seen looking at this notice board.

Second A4 blue poster found on the notice board at the Middle Park Way entrance to Leigh Park Gardens (SCP). This poster was located approximately 15 minutes walk from the nearest point of the reservoir site. Most people using this entrance will not be visitors to the Havant Thicket Reservoir site.



The blue A4 notice has a complex layout, used very small text and was still hard to read even when you got very close up (see photo below)

The poster had already been removed by 6/8/22 even though the consultation did not end until 16/8/22.



Posters were not erected at the start of the consultation and had been removed at least 10 days before the Summer 2022 consultation on the HWTWRP ended

## **Appendix C**

### **Inadequate consultation to select an effluent recycling option in Hampshire**

#### **Why was the Southern Water 2021 Public Consultation completely inadequate to be used to select effluent recycling via Havant Thicket Reservoir as the preferred option?**

The 2021 consultation was not adequate to assess the preferred water resource options at the formative stage of the Southern Water (SW) plan, once desalination at Fawley was rejected when the water resource management plan materially changed in late 2021. The justification for this analysis is set out below.

- The 2021 consultation was not intended or designed to be an option assessment or selection process. This is confirmed by SW in the consultation brochure (Ref 1) and the SW 2021 consultation feedback report (Ref 2).
- Potential back up options to desalination (including effluent recycling via Havant Thicket Reservoir) were not described in any detail, nor was any information provided on any of the backup options environmental impact to enable those consulted to provide informed comment.
- Regulators and Local Authorities indicated that they were unable to make informed or substantial comments on the 2021 consultation due to the lack of information provided on the alternatives (Appendix C item 2 & Ref 2).
- Not all alternative options were considered or included in the consultation. Other more sustainable alternatives are only starting to be considered by SW in 2026 following pressure from the public and regulators.
- No information was presented as to which communities would be directly impacted by receiving recycled water at their taps. As a result, most communities in south Hampshire could not have known that the consultation was relevant to them.
- The 2021 consultation was solely online with a virtual exhibition space which SW confirm was described by many respondents as difficult to navigate, excluding many who had no internet access or were not computer literate.
- There were no public exhibitions nor deposit of consultation materials in libraries or public buildings in communities that would be impacted.
- The consultation was not actively promoted in local communities that might be impacted, not even to all Parish Councils, resident groups & environmental groups.
- There was just one press release about the consultation, with no second press release even when the deadline for responses was extended.
- The critical end period of the consultation coincided with Purdah, the pre-election period (which ran from the 25th March 2021 to 6th May 2021) during which time local councillors will generally refrain from making public announcements. A time when both councillors, local community leaders and activists would have been pre-occupied with the elections.
- Not all communities impacted were engaged in the same way, only the Fawley community were directly contacted by SW, as a result communities that would be affected remained unaware of the consultation, including communities in the Rowlands Castle, Havant & Portsmouth area.
- There was a strong bias to engaging with the Fawley community.
- Residents and stakeholders in the Rowlands Castle, Havant & Portsmouth Water area had no opportunity to make representations at the formative stage of SW's revised plan, when effluent recycling via the Havant Thicket Reservoir was selected as SW's preferred option in late 2021.

**Further detail on why the Southern Water 2021 consultation was inadequate to support decision making on selection of an alternative effluent recycling option at the formative stage of the plan are set out below.**

1. The 2021 consultation was primarily seeking feedback on desalination at Fawley, the selected & preferred Southern Water (SW) base case option at that time, most of the consultation brochure provided information on that scheme. There was no indication that effluent recycling via Havant Thicket Reservoir was a preferred or selected option. The 2021 consultation brochure stated (Ref 1, page 14).

*The options for a new water supply are not presented as a straight choice between the Base Case and the alternatives – instead, the alternatives will only be considered for delivery should the Base Case be undeliverable.*

The SW 2021 consultation feedback report confirmed (Ref 2, page 7);

*The purpose of the non-statutory public consultation in 2021 was to consult on the Base Case as presented in the WRMP19, which Southern Water has an obligation to use its all best endeavours to deliver. Some information on the alternative options was provided as part of the consultation to provide wider context and to seek views on the alternative options, should the Base Case prove to be undeliverable, however the scope of consultation was to consult on the Base Case and **it was not an options appraisal consultation where consultees were asked to select a preferred option.***

2. Eight options were mentioned as 'backup' solutions in the consultation brochure in case Fawley desalination failed, including an option for recycling effluent from Budds Farm WWTW via Havant Thicket Reservoir, but no meaningful details on this or the other backup options were provided to enable an informed response, not even specific location maps or environmental information. SW's feedback report page 22 refers to;

- *The Environment Agency noted that slides on the alternative options would have been helpful to be presented in the virtual room.*
- *Natural England noted that the level of information, and in particular environmental information provided in the consultation brochure, did not enable an informed position to be provided.*
- *Several of the Local Planning Authorities who responded stated that they were unable to provide substantial comments on the merits and impacts of the Base Case and alternative solutions due to the level of detail provided by Southern Water to date.*
- *SW feedback report stated on page 28; On the whole, respondents were supportive of water recycling as an alternative to desalination, with particular reference made to the perceived lower environmental disturbance, lower cost and energy usage. However, some respondents noted that **the limited information provided in the consultation brochure made it difficult to provide a fuller opinion, and requested additional design information and environmental impact information.***
- *When summarising the responses to Q6 & 7 SW urged caution as although respondents were often supportive of water recycling in general due to the perceived likelihood of lower environmental damage, **it was important to note that the consultation materials did not include any assessment work to confirm that this is the case.***

In fact, there was no environmental assessment for any of the backup options presented.

On page 28 of the consultation brochure SW confirmed;

*Our consideration of the potential future use of Havant Thicket in connection with options D2 (water transfer) and B4 (effluent recycling) is separate to Portsmouth Water's current planning application for the construction of the proposed Havant Thicket reservoir. If taken forward (in the event that our Base Case is not deliverable), **these proposals would represent a separate scheme which changes the way that the reservoir is used. Accordingly, full consultation and separate development consents and environmental permits would be required.***

3. There was no indication in the consultation brochure that other alternative and more sustainable options such as new winter storage reservoirs, aquifer storage, or moving abstractions had been considered. Nor alternative effluent recycling options at other sewage works. A full review of all options is required under the Water Industry Act 1991 when there is a material change to a water resources plan. Only desalination, transfer and effluent recycling options appear to have been considered by SW in 2021.
4. There was no information in the consultation brochure about which communities would receive the recycled water, as a result many people probably assumed they would not be impacted by some of the options. A map should have been provided to show the communities in the Southern Water and Portsmouth Water supply area that could be directly impacted by the potential new source of recycled water. As a result, most communities in south Hampshire could not have known that the consultation was relevant to them, and that if they were concerned about effluent recycling they needed to engage.
5. The 2021 consultation was solely online with a virtual exhibition space. This did not provide an adequate consultation and would have largely excluded and disadvantaged those without internet access. The SW feedback report confirmed that the concerns expressed by those who did manage to respond included.
  - *Many respondents found it difficult to navigate the online platform, particularly on a tablet or mobile phone (page 29).*
  - *9% of respondents indicated that the virtual engagement platform was difficult to navigate (page 20)*
6. There were no public facing exhibitions in any of the areas which could be impacted by any of the backup options, consultation materials were not deposited in local libraries.
7. Just one press release was issued by SW. The press release gave no information on the location of the effluent recycling options. The only reference to the Havant Thicket Reservoir was in relation to a bulk water transfer from the spring fed reservoir planned by Portsmouth Water. There was no mention of a proposal to discharge recycled effluent into the Havant Thicket Reservoir.

As a result, the consultation was not picked up by the media in the Rowlands Castle, Havant or Portsmouth areas. The first time any customers in the Portsmouth Water supply area had become aware of the Southern Water proposal involving the potential use of reservoir for effluent recycling, was when a National Newspaper (Guardian) article on 5 May 2021 was published referring to the Southern Water proposal for effluent recycling via Havant Thicket Reservoir as a backup water resource option. Despite a social media frenzy in the Havant area expressing concern and dismay, it was too late for the public to raise any objection as the Southern Water consultation had closed on 16 April 2021.

Notes to editors with the February press release indicated; “The consultation starts on February 8 and runs for six weeks, until March 23. All responses must be sent by midnight on March 23”. There was no subsequent press release provided to indicate the extension to the consultation period to 16 April 2021 requested by the Fawley community.

8. The critical end period of the consultation coincided with Purdah, the pre-election period (which ran from the 25th March 2021 to 6th May 2021) during which time local councillors will generally refrain from making public announcements. A time when both councillors, local community leaders and activists would have been pre-occupied with the elections. This is confirmed on page 8 of the SW feedback report (Ref 2)
9. There was no effort to alert residents or non-governmental stakeholders in the Rowlands Castle and Havant area most impacted by effluent recycling via Havant Thicket Reservoir that a consultation was taking place in 2021. This is in complete contrast to the effort made by SW to engage with the public and landowners in the vicinity of the Fawley desalination scheme.
  - The consultation information & questions primarily related to the Fawley desalination base case selected option.
  - Notification letters were distributed to local residents in the Fawley area, but not to residents in the area of the backup options.
  - Registered owners of the land for the Fawley Base Case site and the associated pipeline route options were identified by SW and letters were sent by post or e-mail. No such contact was made for the backup options.
  - In the Fawley area notices were also placed on site where the land was not registered and the owners could not be identified. No posters were put up at sites where backup options might be located. For example, no notices/ posters were put up at the Havant Thicket Reservoir or Water Recycling Plant site.
  - Emails/ letters were sent to those that had previously expressed an interest in the Fawley desalination scheme. No such letters were sent to those stakeholders and residents who had been engaged for many years on the Havant Thicket Reservoir Project.
  - An extension of time to the consultation period was provided in response to some residents located in the Fawley area contacting Southern Water to note that they had not been contacted directly or had not seen the consultation.

This bias towards engaging with the Fawley community was reflected in the information from respondents to the consultation.

- 38% stated that they lived close to the proposed Fawley desalination Base Case option
- 13% stated that they owned land within the area,

Only 180 responses were received to the SW 2021 consultation. Much lower than the response level to the subsequent 2022 (571 responses) & 2024 (900+ responses) consultations on the HWTWRP for effluent recycling via Havant Thicket Reservoir. If people in the Rowlands Castle and Havant area had known about the SW 2021 consultation, there would have been a much bigger response expressing significant concerns.

Residents and stakeholders in the Fawley area had years to object to the Fawley desalination scheme through previous SW consultations on the both the draft WRMP14 and WRMP19 option selection process, and then again via the 2021 consultation. Effluent

recycling via Havant Thicket Reservoir was not an option included in the WRMP19 and had not been previously consulted on.

SW's efforts to publicise the 2021 consultation were very limited and did not reach the communities that would be impacted by the backup options, including the Havant community which would be most impacted by the effluent recycling via Havant Thicket Reservoir option. For example, details of the consultation were not sent to;

- Rowlands Castle Parish Council (area includes half of the reservoir site), nor Horndean or Clanfield Parish Council.
- Residents Associations or groups in the Havant Thicket/ Budds Farm area.
- Solent Protection Society (who have a keen interest in Langstone Harbour which is downstream of the reservoir and alongside the planned location of the WRP)

**Thus, it is clear that residents and stakeholders in the Havant/ Portsmouth area had no opportunity to make representations at the formative stage of the SW revised plan, when effluent recycling via the Havant Thicket Reservoir was selected as their preferred option in late 2021.**

The SW Gate 2 submission (December 2021) to Ofwat confirmed that the SW selected option was effluent recycling via Havant Thicket Reservoir with a volume of 15MI/d. **There was no additional public consultation before SW selected this option.** The volume of the proposed Water Recycling Plant (WRP) has subsequently increased to a 60MI/d Water Recycling Plant, a substantial change which increases the environmental and other impacts of the scheme.

10. SW efforts to advertise the consultation in 2021 were completely inadequate. Those residents who did find out about the consultation expressed significant concern about the inadequate reach of the consultation. Section 3.4.5 of the SW 2021 consultation feedback report indicated.

- *Majority of respondents who provided comments on the consultation noted that they had not been directly informed about the consultation and had found out through a second party (such as another resident on social media or protesting leaflets through their door).*
- *Respondents who are Southern Water customers suggested that information should have been provided to them directly, and some local residents felt that they had intentionally not been directly consulted.*
- *Respondents suggested additional information (such as more detailed environmental information and more specific location information) should have been provided to enable an informed response.*

Figure 7 of the 2021 consultation feedback report showed that 50% of people who responded found out about the consultation through social media or family & friends. It is likely that the majority of these were in the Fawley area.

The feedback report indicated that just over 50% of respondents were based in and around the Fawley area (i.e. the area surrounding the proposed location for the desalination plant and pipelines associated with the Base Case).

**As a result of these deficiencies the 2021 consultation cannot be considered as adequate to inform and select an alternative option at the formative stage of the water resource plan, prior to SW selecting effluent recycling via Havant Thicket Reservoir (Option B4) as the preferred option to take forward in December 2021.**

#### **Additional information**

**Extracts of interest from SW Gate 2 technical reports** (published on SW website December 2021 in relation to the selection of effluent recycling via Havant Thicket Reservoir)

*SW confirmed; The need case for an alternative solution is **not beyond challenge** because it does **not** explicitly feature in WRMP19 as being a preferred solution to meeting the agreed supply deficit (SW Annex 3, Page 226)*

*SW confirm in various places in the documents; This Option is not part of the long-term scheme for alternative water resources set out in WRMP19. If this Option were selected **SW would expect to undertake an update of WRMP19 on the basis of there being a ‘material change in circumstances’**, so as to include this Option in an updated WRMP19 (Annex 5, page 268).*

The SW Annex 3 report confirms there is a **risk of a public enquiry associated with their current strategy**

This demonstrates that Southern Water were aware that there should have been a more robust option selection process before they changed their plan from the Fawley desalination Scheme to Hampshire Water Transfer & Water Recycling Scheme (effluent recycling via Havant Thicket Reservoir) As the HWTWR option was NOT included in their WRMP19.

Under the requirements of the Water Industry Act 1991 (Section 37A) when there is a material change of this kind to the plan the water company are required to review all of the options and reconsult on the plan. This did not happen before effluent recycling via the Havant Thicket Reservoir was selected. Southern Water have not followed the statutory process for selection of options.

The UK government water resource planning guidelines; Section 3.9 indicates that **if there is a ‘material change’ of circumstance you must prepare a revised draft plan for re-consultation.** Material changes include “new or significant changes to the measures that were identified in the published plan and are likely to have significant public or environmental interest”. Any such ‘material change’ in circumstances required a consultation exercise in accordance with the procedures set out in Section 37 B & C of the Water Industry Act. Specifically, SW would be required to publish the proposed revisions to its WRMP in a way ‘*calculated to bring it to the attention of the persons likely to affected by it.*’ This should have included Portsmouth Water customers. SW have not done that

Reference 1- Water for Life Hampshire Consultation Brochure 2021

[Read the brochure we've produced for the consultation.](#)

Reference 2 - Water for Life - Hampshire Consultation Feedback Report, September 2021 Final Version

[Consultation feedback report](#)

**From:** [Hampshire Water Project](#)  
**To:** [REDACTED]; [Hampshire Water Project](#)  
**Subject:** RE: Hampshire Water Transfer and Recycling Project  
**Date:** 09 June 2026 12:46:56  
**Attachments:** [REDACTED]

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Good afternoon Mr Stanley

Thank you for your email and attachments.

The application above was submitted on 28 May 2026 and the acceptance decision must be taken on or before 25 June 2026. The decision will be published on the [project webpage of the National Infrastructure Planning website](#).

If the application is accepted, the following documents will also be published on the project webpage:

- The application documents (if they are not already published).
- Any Adequacy of Consultation Representations submitted by relevant local authorities.
- The Planning Inspectorate's acceptance checklist.

### **The acceptance tests**

Section 55 of the Planning Act 2008 states that an application can be accepted provided:

- it is an application for an order granting development consent;
- that development consent is required for any of the development to which the application relates;
- the Applicant has, in relation to a proposed application that has become the application, complied with Chapter 2 of Part 5 (pre-application procedure); and
- that the application (including accompaniments) is of a standard that the Secretary of State considers satisfactory.

The following must be considered when making the decision:

- a) The Consultation Report received with the application
- b) Any Adequacy of Consultation Representations received by the Planning Inspectorate from a local authority consultee.
- c) The extent to which the Applicant has had regard to government guidance.

If you have sent comments about the **Pre-application consultation**, these can be considered in addition to the statutorily required acceptance tests when making the decision about whether or not to accept the application. However, it will be for the decision maker (the Planning Inspectorate on behalf of the Secretary of State) to decide the weight to give to the views expressed based on the individual facts of the case.

If you have sent comments about the **merits of the Proposed Development** (e.g. setting out support for, or objection to, the principle of the Proposed Development) these cannot be considered at the acceptance stage. Should the application be accepted for Examination you will be able to submit your comments as a 'Relevant Representation' and register as an Interested Party. Your comments must be submitted on the 'Registration and Relevant Representation form' which will be made available on the project webpage of the National Infrastructure Planning website at the appropriate time.

Further information about registering as an Interested Party can be found in the Planning Inspectorate's Advice for members of the public: [How to register to have your say and make](#)

[a relevant representation.](#)

You may find it helpful to subscribe to [Get updates](#) by email on the progress of the above application.

Kind Regards



**Rammiel Burnie (He/Him)**  
Case Officer  
Planning Inspectorate  
Telephone: 0303 444 5201  
[www.gov.uk/pins](http://www.gov.uk/pins)

Ensuring **fairness, openness** and **impartiality** across all our services

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**From:** Chris Stanley [REDACTED]@rowlandscastleparishcouncil.gov.uk>  
**Sent:** 09 June 2026 09:34  
**To:** Hampshire Water Project <HampshireWaterProject@planninginspectorate.gov.uk>  
**Cc:** Parish Clerk <clerk@rowlandscastleparishcouncil.gov.uk>  
**Subject:** Hampshire Water Transfer and Recycling Project

[REDACTED]  
Dear Sir,

Rowlands Castle Parish Council wishes to make the strongest possible submission that the consultation by Southern Water concerning the above project with appropriate authorities and the general public **has not met the required standard** by a large margin and they have not complied with the legislative requirements under the Planning Act 2008, Sections 42, 47 and 48.

To that end, please find attached the following documents:

The Adequacy of Consultation Proforma (AoCR).

20260609 - RCPC letter to the Planning Inspectorate re the inadequacy of the consultation.

20260500 - Inadequacy of Consultation Report for RCPC, produced by our technical advisor

2021 Southern Water consultation-feedback-report

The last 2 are documents referenced within the letter setting out our concerns.

We ask that you give this thorough consideration because we are deeply concerned that Southern Water has made every effort to push this project through regardless of due process and the need to thoroughly engage and consult with all relevant authorities and the public at every stage and to take proper consideration of their views.

Thank you in anticipation.

Yours

[REDACTED]  
Chairman  
Rowlands Castle Parish Council

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