

Via email only

Enquiries to: Councillor Alex Rennie
Direct line:
Email: alex.ennie@havant.gov.uk
My reference:
Your reference:
Date:

Dear Sir or Madam

**PORTSMOUTH WATER DRAFT WATER RESOURCES MANAGEMENT PLAN 2024
CONSULTATION RESPONSE**

Thank you for consulting Havant Borough Council on your Draft Water Resources Management Plan 2024 which sets out how Portsmouth Water intends to achieve safe drinking water supplies for our residents and businesses.

We welcome the opportunity to work with Portsmouth Water on this plan, together with other water companies including Southern Water. We also support Portsmouth Water's recognition of the increasing challenges of climate change, population growth and the pressing need to support our natural environment together.

We are pleased to set out comments on the various elements of the Plan below, which focus on new water supplies into the future.

Do you support the balance between saving water from leaks, metering and water efficiency, and water being supplied from new sources?

The Council is obviously aware of Southern Water's Hampshire Water Transfer and Water Recycling Project which includes proposals to recycle wastewater from Budds Farm Wastewater Treatment Works and transfer it into Havant Thicket Reservoir in order to boost the amount of water the reservoir could supply to Hampshire during a drought.

The Council fully recognises the importance of addressing the significant and urgent need to address Hampshire's water shortfall and welcomes the efforts that are being made by Southern Water to address this. However, we do have concerns relating to the use of recycled treatment wastewater as a technology which would be new to this country, and in fact the first of its kind in the UK.

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

The Council considers that better demand management and increased capacity at other reservoirs would reduce the demand for water from being supplied from new sources. We therefore welcome acknowledgement that from 2025 there is the potential to supply an additional 9 million litres of water each day in Hampshire, and from 2029 a further 21 million litres from Havant Thicket Reservoir which in turn, reduces the amount of water which would need to be supplied from elsewhere. Indeed it is noted that Southern Water themselves plan to increase water supplies into the west of the region through a proposed new reservoir close to Blackstone in West Sussex.

History of Havant Spring

The Borough of Havant is perhaps best known for its acclaimed spring water, which is regarded as one of the best examples of Chalk karst springs in the UK. In fact, this is how the town derives its name, being known in 935AD as 'Hamafunta' the spring of Hama.

For much of our history, fresh water has played a vital part in local commerce, from water mills to parchment manufacture to brewing. We are a Borough built on the remarkable natural geography of the Bedhampton Spring.

The springs are large, with a combined flow of approximately 104 000 m³/day — enough to fill 40 Olympic-sized swimming pools every day.

During the winter, much of this water flows into Langstone Harbour, excess to the drinking needs of the Borough. Indeed in 2021 I was pleased to support plans for the Havant Thicket Reservoir and a pipeline to fill it with spring water which will be the first new reservoir to be built in the South East since the 1970s.

Havant Thicket Reservoir

The new reservoir will be a fantastic resource and will reduce the water strain on the South East. We welcome and still support the reservoir. However, throughout the process, Councillors were told that this reservoir would be filled from excess water from the Bedhampton Springs. The below extract is from Page 2 of the 121 Page planning application.

“The reservoir, when constructed, would be filled with surplus water drawn from the springs at the Bedhampton works during the winter when flows are at their highest - via a new combined inlet/outline pipeline. The reservoir would provide water supplies to Portsmouth Water customers in the summer months as required. Additionally, it would allow Portsmouth Water to transfer water to East Hampshire to supply Southern Water’s customers, even in a severe drought.”

Havant Borough Council has serious concerns about why Southern Water did not make clear its wish to use water recycling during the planning process for the outline planning application that concluded last summer. This would have I’m sure have had an impact on the public perception on the reservoir project and application. Residents in this Borough are

wary of Southern Water due to the reputational impact of the record £90million fine that it received for 6,971 unpermitted sewage discharges in 2021.

We welcome the commitment that, before providing support for this option Portsmouth Water will need to be satisfied that the recycled water from this project will need to meet strict, high drinking water quality standards. In addition, that it would need to be demonstrated that there would be no detrimental impact on Portsmouth Water's environmental commitments around Havant Thicket Reservoir.

The Council agrees that it is of the utmost importance that the proposal is correctly scrutinised to ensure it delivers safe drinking water in an environmentally responsible way. As a Nationally Significant Infrastructure Project, the Secretary of State is the consenting authority in place of the Council as the local planning authority. As such, it is appropriate for there to be meaningful engagement and cooperation between Southern Water, Portsmouth Water and the Council before the proposal is submitted for consideration through the Development Consent Order process.

In particular, the Council has sought ongoing engagement between Southern Water and our residents in relation to the water recycling project between now and the formal consultation on the Hampshire Wastewater Transfer and Recycling Project which took place during the Summer 2022.

Do you support our plans to help homeowners and businesses save water?

Countries around the world are facing rising goods and energy prices, inflation and cost of living pressures, and the UK is no exception. The rising cost of living is affecting everybody in different ways.

We welcome Portsmouth Water's initiatives to save water which will help our residents and businesses to reduce the cost of water and energy bills.

Conclusion

Havant Borough Council welcomes this draft Water Resources Management Plan which will help to secure safe drinking water supplies for our residents and businesses over the next 50 years. It is a key priority of the Council to deliver infrastructure projects that will help towards addressing climate change, and indeed we look forward to working with you to deliver the Plan. Whilst we recognise there is a very clear need to address the water shortfall in deficit, we remain unconvinced that Southern Water's water recycling project represents a sound environmental solution.

Yours faithfully

Councillor Alex Rennie
Leader of the Council

Via email only

Enquiries to: Councillor Alex Rennie

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Dear Sir or Madam

**SOUTHERN WATER DRAFT WATER RESOURCES MANAGEMENT PLAN 2024
CONSULTATION RESPONSE**

Thank you for consulting Havant Borough Council on your draft Water Resources Management Plan (WRMP) 2024 which looks ahead to how drinking water will be supplied to residents and businesses across the South East.

We support Southern Water's recognition of the increasing challenges of climate change and population growth, and the pressing need to improve and enhance the natural environment for future generations. We also welcome Southern Water's efforts to work with others including Portsmouth Water but consider that it needs to go much further in engaging with local residents and communities particularly in terms of how water supply is to be sourced in the future.

The Council fully recognises the importance of addressing the significant and urgent need to address Hampshire's water shortfall and welcomes the efforts that are being made by Southern Water to address this. However, we have concerns relating to the Hampshire Water Transfer and Water Recycling Project which includes proposals to recycle wastewater from Budds Farm Wastewater Treatment Works and transfer it into Havant Thicket Reservoir in order to boost the amount of water the reservoir could supply to Hampshire during a drought.

We have concerns relating to the use of recycled treatment wastewater as a technology which would be new to this country, and in fact the first of its kind in the UK. It is therefore of the utmost importance that the project and the proposal are correctly scrutinised to ensure it is the appropriate way to deliver safe drinking water in an environmentally responsible way.

As a Nationally Significant Infrastructure Project, the Secretary of State is the consenting authority in place of the Council as the local planning authority. As such, it is appropriate for there to be meaningful engagement and cooperation between Southern Water, Portsmouth

Water and the Council before the proposal is submitted for consideration through the Development Consent Order process.

History of Havant Spring

The Borough of Havant is perhaps best known for its acclaimed spring water, which is regarded as one of the best examples of Chalk karst springs in the UK. In fact, this is how the town derives its name, being known in 935AD as 'Hamafunta' the spring of Hama.

For much of our history, fresh water has played a vital part in local commerce, from water mills to parchment manufacture to brewing. We are a Borough built on the remarkable natural geography of the Bedhampton Spring.

The springs are large, with a combined flow of approximately 104 000 m³/day — enough to fill 40 Olympic-sized swimming pools every day.

During the winter, much of this water flows into Langstone Harbour, excess to the drinking needs of the Borough. Indeed in 2021 I was pleased to support plans for the Havant Thicket Reservoir and a pipeline to fill it with spring water which will be the first new reservoir to be built in the South East since the 1970s.

Havant Thicket Reservoir

The new reservoir will be a fantastic resource and will reduce the water strain on the South East. We welcome and still support the reservoir. However, throughout the process, Councillors were told that this reservoir would be filled from excess water from the Bedhampton Springs. The below extract is from Page 2 of the 121 Page planning application.

“The reservoir, when constructed, would be filled with surplus water drawn from the springs at the Bedhampton works during the winter when flows are at their highest - via a new combined inlet/outline pipeline. The reservoir would provide water supplies to Portsmouth Water customers in the summer months as required. Additionally, it would allow Portsmouth Water to transfer water to East Hampshire to supply Southern Water’s customers, even in a severe drought.”

Havant Borough Council has serious concerns about why Southern Water did not make clear its wish to use water recycling during the planning process for the outline planning application that concluded last summer. This would have I’m sure have had an impact on the public perception on the reservoir project and application.

Southern Water

For residents in this Borough, they are already wary of Southern Water due to the reputational impact of the record £90million fine that it received for 6,971 unpermitted sewage discharges. Whilst the company says that it has changed, residents in this Borough, would want to see long-lasting commitment and proven action before agreeing to a radical proposal on how our drinking water is delivered.

In addition, we have commented on various elements of the consultation below as follows.

Do you agree that water recycling has a role to play in securing water supplies for the future?

The process of using recycled water has a potentially high environmental impact. The Council remains unconvinced that this is the best way to tackle the water supply deficit in Hampshire. Indeed, the draft WRMP itself recognises that it is energy intensive option which could impact on the environment.

The Council considers that better demand management and increased capacity at other reservoirs would reduce the demand for water from being supplied from new sources. In particular, it is noted that Thames Water is developing plans for a new South East Strategic Reservoir which could enable up to 120 million litres per day being transferred into Hampshire. In tandem with this the draft WRMP includes proposals to increase water supplies into the west of the region through a new reservoir close to Blackstone in West Sussex.

A new strategic reservoir is an integral part of the regional best value plan for the South East. Do you have any comments on the size of the new reservoir? Does your position change if the size of that reservoir (which will supply the transfer into Hampshire) impacts on the size of water recycling plant needed at Havant Thicket)?

The Council does not consider the case for the Hampshire Water Transfer and Water Recycling Project has been fully developed. The fact that it is still being progressed as an option suggests that it may not be needed, or that there may be an alternative. There would appear that there is a great deal of further work to be undertaken before the next consultation on the project in the summer.

In particular, there remains uncertainty given the size and timing of the South East Strategic Reservoir which will impact on the size of the water recycling plant needed to serve Havant Thicket. The principle of the need for the water recycling plant at Havant Thicket is therefore questioned.

Conclusion

Whilst Havant Borough Council welcomes Southern Water's plans to address Hampshire's water shortfall, it remains unconvinced that the Hampshire Waste Transfer and Wastewater Recycling Scheme represents a sound environmental solution.

As set out in the Council's previous consultation response dated 16th August 2022 in relation to the Hampshire Water Transfer and Water Recycling Project consultation during the summer, engagement with our residents needs to be ongoing between now and the next consultation on this project in summer 2023. Water recycling is not a technology which

is familiar to most in the UK. This only emphasises the need to focus on engagement as part of the proposal so that all stakeholders can respond on an informed basis. We would welcome discussions about how a package of engagement could rolled out, focussing on raising awareness of the project and what it entails before the consultation in the Summer 2023.

Yours faithfully

Councillor Alex Rennie
Leader of the Council

NON EXEMPT

HAVANT BOROUGH COUNCIL

CABINET

RESPONSES TO THE DRAFT WATER RESOURCE MANAGEMENT PLAN CONSULTATIONS FOR PORTSMOUTH WATER AND SOUTHERN WATER

FOR DECISION

Portfolio Holder: Cllr Elizabeth Lloyd – Cabinet Lead for Local Plan, Environment and Water Quality

Key Decision: No

Report number: [Completed by Democratic Services]

1. Purpose

- a. This paper is submitted to for decision.

2. Recommendation

- a. Cabinet are requested to:
 - i. Approve the consultation responses to the Draft Water Resources Management Plans for Portsmouth Water (Appendix A) and Southern Water (Appendix B) for submission to the two water companies.
 - ii. Delegate authority to the Cabinet Lead for the Local Plan, Environment and Water Quality (in consultation with the Leader) to submit any further relevant responses, including any arising out of the consultation responses (at Appendices A and B) as a result of the residents' meeting with Portsmouth Water and Southern Water.

3. Executive Summary

- a. The history of Havant Borough is inherently linked to water. The Homewell Springs are one of the best examples of chalk springs in the UK. It is incumbent upon the Council to ensure that the feature for which Havant is best known is protected for future generations.
- b. Water companies are required to prepare Water Resource Management Plans (WRMP) every five years and these are subject to statutory consultation.
- c. This report proposes a response to both Portsmouth Water and Southern Water's Draft Water Resources Management Plans. These are attached at appendices A and B respectively.

4. Additional Budgetary Implications

- a. None.

5. Background and relationship to Corporate Strategy and supporting strategies and policies

- a. As part of the Pride of Place theme, the Corporate Strategy highlights that the Council will "aim to take measures to promote and embed environmental matters and consider environmental impacts in all our decisions to help tackle climate change".
- b. Water is intrinsically linked to Havant's history and development. The Homewell Spring saw Havant become a centre for the treatment of animal skins for leather and parchment making, as well as the production of tallow and other by-products. The mineral-rich qualities of the spring water gave Havant parchment its distinct whiteness. It is said that it was used for the Magna Carta (1215) and the Treaty of Versailles (1919).
- c. This has continued since with the water from the springs now supplying most of southern Hampshire and West Sussex.
- d. Effective water resource planning is essential in striking the correct balance and ensuring that there is a plentiful supply of water to residents and businesses, that this can adapt to the challenges of

climate change and protect the natural environment. Every five years, statutory Water Resources Management Plans set out each company's intended approach for at least the next 25 years.

- e. Water companies are increasingly required to work collaboratively and on a regional basis, in order to ensure that areas where water is more plentiful are able to assist those where there is less water or where abstraction licenses need to be revisited.
- f. Within this context, abstraction licenses on the Rivers Test and Itchen must be reduced to protect those chalk streams. This led to the bringing forward of the Havant Thicket Reservoir, which has now been granted planning permission. The planning permission relates to the reservoir's use as a winter storage reservoir – storing excess spring water emitted during the winter in order for it to be used during the summer months when water is scarcer.
- g. Since planning permission was granted, the project has developed into a proposal to further treat wastewater which would be discharged from the Budds Farm Wastewater Treatment Works. Under the proposals, this water would then be pumped to the relevant treatment works and processed to drinking water standards.
- h. The project has been classified as a Nationally Significant Infrastructure Project. As such, the eventual Development Consent Order application will not be determined by Havant Borough Council but by the Secretary of State for Levelling Up, Housing and Communities through the Planning Inspectorate. Havant Borough Council would be a consultee on the application.
- i. The proposed responses (Appendices A and B) to the consultation raise concerns regarding the proposals and the potential for environmental harm. In addition, concern is raised regarding the uncertainties which remain.
- j. The Leader has arranged a question and answer session with residents, Portsmouth Water and Southern Water about the proposals on 15 February 2023. There may be additional matters arising from this meeting which the Leader may wish to address. As such the recommendations within this report delegate authority to the Cabinet Lead for the Local Plan, Environment and Water Quality (in

consultation with the Leader) to submit any further relevant responses on this topic.

- k. Moving forwards, the Council should continue to closely monitor the emerging proposals and engage with both water companies and other stakeholders in the process.

6. Options considered

- a. The main alternative would be to 'do nothing' and not respond to either consultation. This is not recommended as, whilst the Council will not be the determining authority for the eventual application, it remains a key consultee and custodian of the Borough's environment.

7. Resource implications

a. Financial implications

- i. There are no immediate financial implications of the submission of the proposed consultation responses. A Planning Performance Agreement (PPA) is in the process of being agreed which will cover staffing costs of engagement with this project at this stage. Moving forwards, particularly at the stage of the submission of a Development Consent Order, it is likely to require specialist advice in order for the Council to appropriately and robustly respond. This would have a cost implication.

Section 151 Officer comments

24 January 2023

There are no direct financial implications arising from this report. Any future requirement to engage specialist advice, (with associated costs), will be subject to a further report to, and decision from, committee.

b. Human resources implications

- i. Similar to financial implications, there are no human resources implications of the submission of the proposed consultation responses. Moving forwards, whilst the PPA would cover

staffing costs, particularly at the stage of submission of a Development Consent Order, it is likely require internal as well as specialist resources in order for the Council to appropriately and robustly respond. This would likely require diversion of officer resource from other projects.

c. Information governance implications

- i. None.

d. Climate and environment implications

- i. The environmental impact of various ways of ensuring adequate water supply need to be carefully considered. This is the main theme highlighted in the proposed responses.

e. Other resources implications

- i. None.

8. Legal implications

- a. No immediate or direct legal implication arise

Monitoring Officer comments

Water companies have a statutory duty to prepare, consult, publish and maintain Water Resource Management Plans (WRMPs). These documents demonstrate how sufficient water will be provided to meet the demands of customers over a certain period.

In anticipation of this, they consult with regulators and stakeholders during the preparation of their plans and then publish a draft for wider consultation. As Portsmouth Water and Southern Water supplies water to the Borough, the Council is considered one such stakeholder and is expected to formally contribute to the development of the WRMP.

Any representations must be considered and responded to in a Statement of Response, which is also published. The Secretary of State will then decide whether the plans can be finalised or whether a hearing or inquiry should be held beforehand

31/1/23

9. Risks and mitigations

- a. The proposals within this report constitute responses to consultations only. There are no discernible risks from responding to the consultations.

10. Consultation

- a. No specific consultation is necessary.

11. Communications

- a. It is notable that the proposed water recycling project is advancing. As such, it is considered appropriate for the Council to publish a page on the website explaining the proposals, Havant Borough Council's role and linking residents to Portsmouth Water and Southern Water's websites where they can find out more.

12. Appendices

- a. Response to the Water Resources Management Plan for Portsmouth Water.
- b. Response to the Water Resources Management Plan for Southern Water.

13. Background papers

- a. None.

Agreed and signed off by:

Portfolio Holder: Cllr Elizabeth Lloyd	30/01/2023
For Executive Head: David Hayward	30/01/2023
Monitoring Officer: Mark Watkins	31/01/2023
Section 151 Officer: Malcolm Coe	24/01/2023

Contact officer:

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