

CPRE Response to Southern Water's 'Water for Life' consultation

Q1. I (represent) a stakeholder from an organisation CPRE) interested in this programme

Q2 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?

Disagree

Please provide any comments to support your answer to the previous question
(Please provide as much detail as you can.)

CPRE-Hampshire has many issues and concerns with this base-case desalination solution. If it goes ahead, then detailed points on all aspects will be made in response to the planning application to PINS. Meanwhile, a summary of our concerns is given below:

1. Landscape and environmental impact, including noise and lighting, on the proposed area of the desalination plant west of the old power station and south of Ashlett Creek.
2. Supply Options : Of the 6 alternatives we prefer A. with all the water being transferred to public supply via the Testwood WTW. Our position is that large industrial plants like Fawley should secure and/or make their own industrial process water and not rely on environmental water from the public supply. Fawley has the engineering expertise and all site facilities to produce its own industrial water thereby releasing some 40Mlpd of environmental water back to the public supply.
3. Pipeline routings will require careful environmental investigations
4. Intake and discharge pipes must not be too close, to prevent any possibility of the recirculation of brine, and disruption of both marine and sea-bed ecosystems in their vicinity must be minimised.
5. The seawater intake needs to take full account of tides, rips, currents and sediment flows and not just depth.
6. The outflow of brine with its entrained process chemicals must be carefully dispersed, as it may have unforeseen effects on marine life (as in 4 above).
7. The ~40Mw of electrical power required will need supply via overhead lines with landscape and routing impact.
8. Strongly opposed to the disposal of waste to landfill without any prior sorting and reuse of recovered chemicals etc.

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?

Desalination alternatives

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

Neither alternative seems justifiable.

The smaller A2 option (61Mlpd) will produce an equal noise and landscape impact and will not produce enough supply to fill the 75Mlpd gap.

For D.1 - we have already stated our case re industrial users being required to produce their own water (see 2 above).

Alternatives to the base case.

1 Water recycling

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

To what extent do you agree that the proposed recycling would be an **acceptable** solution to the potential future water resource challenges in Hampshire?

Disagree

Please provide any comments to support your answer to the previous question (Please provide as much detail as you can.)

B1-B4 are not a solution for the whole 75Mlpd shortfall as they do not create a new water source.

Recycling is a preferred landscape option for CPRE as it uses plant in existing treatment works, although the pipeline routes will need to be carefully evaluated as they are announced for planning.

Recycling and grey water use both domestically (in new-build houses via Building Regs) and corporately/industrially should always be part of a mosaic of solutions.

The removal of effluent pollution from the rivers/estuaries is essential and treated recycling achieves that.

2 Water Transfer alternatives would comprise:

· Configuration D.2: 75 MI/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 online engagement room and consultation brochure.

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.

Agree

Please provide any comments to support your answer to the previous question (Please provide as much detail as you can.)

Water transfer from Havant Thicket Reservoir seems to be a preferred option for SW now. Although CPRE has issues with some of the reservoir plans - (see response to planning consultation) , to save our rivers and provide a new water source which will meet the current shortfall - then this seems to be the only sensible option. We have some doubts about the long-term sustainability of the Chalk springs. It is generally acceptable in landscape and river conservation terms, although detailed responses to the pipeline planning applications will follow.

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

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

See above

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.)

- CPRE Hampshire deeply regrets the time it has taken to get to this stage of planning additional water resources for Hampshire.
- We value SW's commitment in the light of the Section-20 agreement to protect the rivers and make drought orders a thing of the past. However, we foresee that water transfers from other companies may well be likely in the further future if increasing CC-drought predictions are valid. CPRE do not, in principle, agree with such neighbouring future transfers as ever more scarce water will increasingly be required in these populating

southern counties, thereby decreasing their environmental sustainability and flows of their river and spring sources. Recycling and/or desalination will then be the next future option.

- Leakage and demand reduction are perennially important and must be continuously addressed quickly and efficiently. Then, with Havant Thicket and recycling, future water supplies in SW Hants can be maintained and aquifers and our local aquifers and rivers protected.
- Finally, CPRE maintains the principle that large, private, (foreign-owned) industrial complexes (like Exxon Fawley), should provide their own industrial process water supply and not consume local environmental public supply waters.
- They are more than capable of engineering their own process waters for their own specific requirements, as they do in most of their other worldwide operations. They also have substantial waste steam and heat available on-site to be able to utilise thermal desalination processes in a much more efficient and sustainable manner to produce pure distilled process water, rather than being supplied with inferior RO desalinated water by external agencies. Given a 5-year development time to get such an own system up and running, this would set free some 40 ML/d of 'public' water by 2026, thus making it the only scheme on offer that will provide drought-relief to our local rivers before the original 2027 deadline !

Source of info

Stakeholder

Do you have any feedback on this consultation - events, level of information provided, advertising etc?

(Please provide as much detail as you can.)

The whole consultation seems to have been overtaken by events with the acceptance by RAPID of the new Havant Thicket+ pipeline proposal.

This is NOT a 5-10 minutes questionnaire and requires considerable research before completion. Very few customers will trawl through and so will answer without the necessary detailed information - If they answer at all. "Life's too short" several have commented.

Arup NB - The feedback form is dreadful and makes it impossible to consult with colleagues.

A PDF of the questions is therefore essential.

Live links to the precise part of the consultation doc also essential.

Please make sure that all the info can fit on any screen and is stable.