

25th November 2024

Secretary of State (Defra)
Water Resources Management Plan Consultation (Southern Water)
Water Resources
Department for Environment, Food and Rural Affairs
Seacole 3rd Floor
2 Marsham Street
LONDON
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Dear Sir,

Southern Water revised draft Water Resources Management Plan (WRMP) 2024

Rowlands Castle Parish Council (RCPC) has reviewed the Southern Water (SW) WRMP in detail and determined that **it is not a robust plan, nor a best value plan. We strongly object to the Southern Water draft WRMP and call on Defra to reject it.** Extensive comments are provided to explain the Council's concerns with suggestions for a better, more sustainable way forward.

Introduction

1. Defra rejected the previous SW draft WRMP in 2023 (following a wide variety of public objections and concerns). Following that rejection RCPC hoped that SW would take the opportunity to start again and undertake a full review of the entire water resources position and bring forward a more realistic plan including many cheaper and good options to improve the availability of water in the future. This has not been done and it is extremely disappointing that the Company has not chosen to start again with a thorough review of all the potential options. Instead, the revised plan focuses on how they can fill in the supply deficit in a drought situation before the previously selected effluent recycling schemes come on stream. In other words, **they have made no attempt to consider prioritising other options that could between them deliver long-term drought resilience without costing their customers a great deal of money over many years as a result of building an extravagantly expensive and environmentally damaging recycling scheme to address a potential (not certain) problem. This means they have not acted as Defra required them to do when the previous Plan was rejected**

Ten Key Problems with the Plan

2. In its latest WRMP **and at a time of climate emergency** SW is driving forward the most expensive and environmentally damaging scheme of those few options it has considered, to address the potential of a 1-in-500-year bad drought for the area to which it supplies water. **This proposal is aimed at delivering the best return for the owners, whose sole objective is to make the maximum profit they can, rather than ensuring that SW delivers an environmentally favourable and consumer-friendly Plan that uses a variety of options to ensure water is available year-round.** This is unacceptable behaviour.

3. The Hampshire effluent recycling scheme at Havant will be required to run 24 hours a day pumping 30Ml/day 40km to Otterbourne throughout the year, even in prolonged periods of wet weather when the rivers are full and groundwater is high. **This will be an enormous cost to the customers who will have to bear the price and also be environmentally damaging because of the high energy footprint required to build and sustain the project over a number of decades, together with the high chemical usage required.**
4. **SW's WRMP is developed to ensure that effluent recycling projects go through, rather than looking properly at the less costly and varied options that collectively could deliver much of what is needed both in terms of additional supply and reduced demand.**
5. There has been a **lack of meaningful and honest engagement** with the Company's customers who will pay and also with those of Portsmouth Water (PW) who will receive the recycled effluent whenever PW need to draw on the reservoir. It not even being made clear in Southern Water's consultation documents that PW customers will inevitably receive the water from time to time.
6. Importantly, **SW did not follow the legal requirement for a new statutory consultation on their plan when there was a material change to the option(s) selected in 2021**, when both the Fawley desalination scheme and the WRMP19 back-up option of discharging recycled effluent to the River Itchen were rejected. **When there was a material change to the plan in 2021 SW should have undertaken a comprehensive review of all the available options and followed that with a full public consultation. That did not happen (see also paragraph 39).**
7. **It is an unbelievable option that SW now propose to bring water in tankers from Norway if a drought occurs in the next 10 years instead of proactively investigating more sustainable solutions.** The Company had considered this proposal before and dismissed it as expensive and environmentally unsound. There is a high risk of importing non-native species to the River Test catchment when the water is stored at existing lakes alongside the river. In addition, there are water quality issues as the water from Norway is soft, has a low pH, low total dissolved solids and even in Norway has to be re-mineralised before use (Annex 20, Page 9). What if the transfer pipe leaks into the river? What if there are no suitable berths for the tankers at the time of need? **The absurd selection of this option should be rejected emphatically.**
8. SW assert that they are most concerned to protect the chalk streams like the Test and Itchen but **have failed to work on moving the abstraction point from Otterbourne to near the tidal limit.** This would allow the freshwater flow to remain in the river until that tidal limit is reached, providing immediate and certain benefit. There is no clear commitment to look at this option urgently and this must be a priority.
9. **There is insufficient attention being paid to Demand Management.** The WRMP Annex 14 shows that SW are looking to reduce average PCC to 110l/h/d by 2045 some 20 years from now and non-household use by only 9% by 2037-38 compared to 2019-20. **Not enough effort is being devoted in the first 10 years to really driving down demand through education and advice to residential customers and non-household users.** This is a key failure in the plan because if demand can be lowered then the need for major infrastructure projects can be reduced.
10. **There is insufficient attention being paid to reducing leakage with a reduction of only 53% by 2050, which is 25 years away.** It is known that 100ml/day is being lost by SW through leakage, water that customers have paid to treat. To reduce this loss to only 50ml/day after 25 years beggars belief, much more effort is needed to tackle this problem so that SW need to take less water from the environment in the first place.

11. **The revised WRMP does not attempt to work with predicted changes to our climate and capture more rain that falls freely from the skies in new reservoirs and underground storage.** The UK stores only 1% of the rain it receives and this is an appalling waste of a free, natural, raw water resource.

Specific concerns about the revised draft plan, relevant to Hampshire (and West Sussex).

12. A full review of the WRMP should have taken place looking at all the options for addressing a possible future water shortage over the long term. Given the importance of finding immediate solutions for the rivers Test and Itchen, and at Pulborough on the Arun, along with the large volume of objections to the options selected in the previous draft plan, a full and more robust review was essential. It is clear that **SW have only focused on identifying options to fill the gap until the proposed recycling schemes are up and running** instead of seriously looking at prioritising more sustainable options that are less costly to implement and run. In the WRMP Annex 20, page 3 SW stated “a full re-appraisal exercise was not considered time or cost beneficial”. This was a bad abrogation of their responsibility to determine the best way forward for their customers and the environment.
13. **The timescales for the delivery of effluent recycling options are unrealistic given their complexity and consenting requirements.** Having put back the delivery year for the Hampshire effluent recycling scheme to 2034-35 in the Statement of Response, in places in the latest plan this option has now been brought forward to 2033-34. This is not realistic given the public opposition, risk of an enquiry, risks associated with bringing forward technology which is new to the UK for effluent recycling, and developing on old landfill sites. The recycling options are much more likely to be delayed further, leaving our iconic rivers with no solution for longer.
14. The SW proposal to continue to rely on, and extend the use of, the Candover Drought Option (augmentation boreholes) and drought permits (Technical Report page 138-139) should not be permitted beyond 2030. The plan extends their use up to 2034. Instead SW should use the next 5 years to bring forward more quickly the sustainable options.
15. SW should not be allowed to continue to use drought options/orders while they just wait for the Hampshire effluent recycling/ transfer scheme to be delivered, as it is inevitable that the recycling scheme will be delayed further and will not be available in 2035.
16. As mentioned above at paragraph 7, **bringing water by tanker from Norway during a drought just cannot be accepted as a credible plan to fill the gap for South Hampshire** until the effluent recycling scheme is brought into use; its financial and carbon cost and impracticability of implementation should immediately prohibit its adoption.
17. **SW are using the most pessimistic assumptions regarding population growth and this in turn drives a large water demand deficit that supports the effluent recycling scheme.** Having fixed on their big, expensive solution the evidence is now being found to justify it by always taking the worst case in terms of population growth and sustained high demand.
18. Assuming high levels of abstraction reform is over-precautionary when what may be required in the future is still very uncertain as SW environmental studies continue.
19. **Assuming no abstraction at all (even in winter) from some rivers is not appropriate,** there will always be an ability to take some water from the rivers and SW is being excessively precautionary in its approach, again to justify huge expenditure on the proposed recycling scheme. Abstraction can be a necessary requirement to alleviate the potential for flooding in the lower reaches of rivers.

20. **SW have not taken account of the completion of the Hampshire Grid improvement programme** that will be available from 2030 to rezone the Western supply area. The Company option review and selection process is based on individual supply zones. Taking account of the increased ability to transfer water by merging existing zones could have changed the options appraisal process. As the plan does mostly cover the period beyond 2030 the improved connectivity of the grid by 2030 should have been fully considered and taken into account in the plan.
21. The investment model is not fit for purpose and needs to be revised as a matter of priority so that it does not preferentially select the use of drought options/permits. The model needs to be able to preferentially select smaller, more sustainable options, as it currently favours large infrastructure schemes that should be a last resort once more sustainable options have been exhausted.
22. Given the spiralling costs, programme delays, significant adverse environmental effects, the need to operate 365 days a year regardless of the likely increased rainfall, lack of legacy and short life-span, **the Hampshire effluent recycling scheme most definitely does not represent the best value for customers who will have to pay the high construction and long-term operating costs.** On this point alone the revised draft WRMP should be rejected.
23. The selection of effluent recycling via Havant Thicket and transfer (40km) to Otterbourne results in **unacceptably high carbon impact and greenhouse gas emissions**, more than double that of any other transfer or desalination scheme.
24. **The SW Preliminary Environmental Information Report (2024) confirmed a likely significant adverse effect on the local marine environment from the Hampshire effluent recycling scheme.** The results of modelling for water quality impacts on the reservoir are still not available. The scheme should not move forward until the environmental risks/ impacts on the reservoir and marine habitats are known and can be properly considered before the option is selected.
25. **The strong concentrate waste water that will be the result of the effluent treatment process at the proposed Broadmarsh plant will be discharged back into the local waters with a very considerable adverse effect on the water around the discharge point.** This discharge will be toxic to the environment and when there is little water coming from the sewerage system in drier conditions the concentrate won't even be partially diluted by the land water. The adverse impact on the environment could be massive and is yet undetermined by thorough research. This is yet another reason why the Hampshire WT&WR Scheme should be cancelled and the whole WRMP be sent back to SW to be redeveloped to more environmentally sustainable solutions
26. **SW proposes to build its new, Hampshire effluent recycling plant on an old landfill site containing a wide variety of unrecorded material, much of which could be toxic in nature.** The Company proposes to drive a large number of piles through this material to the chalk below, which itself connects directly with Langstone Harbour. **There is a high risk of leachate passing down the piles to the chalk and thus out into the harbour, adding potentially toxic substances to the water and damaging the natural environment.** It is a high-risk approach to build large, heavy infrastructure upon such a site yet SW is determined to do so. This is another reason why the WRMP should be returned to SW as unfit for purpose.

Concerns about option selection

27. **Moving the Otterbourne abstraction to the tidal limit would be a better, more robust & sustainable solution to protect the whole of the freshwater catchment & restore natural flows in a drought.** This is not mentioned as an option in the SW Technical Report and is a gross omission given the added value it could bring both to the upstream catchment

area and in maintaining some abstraction. If the current Otterbourne abstraction volumes were permitted to be taken from a new abstraction at the tidal limit, they can still be reduced over time as new solutions come on line, by having a 'time limited' more flexible licence which is subject to regular review and takes into account the timing of fish migration. In the meantime, natural flow could be restored to more than 12km of the River Itchen, including in a drought.

28. In the future SW have indicated that they will work with stakeholders to look at moving the abstraction on the River Adur to the estuary (transitional waters) to allow more abstraction (Annex 20, page 30-31) but this is not in the current plan. As stated earlier, moving river abstractions to the tidal limit can have environmental benefits, restoring more natural freshwater flows along most of the course of a river to protect the ecology. This scheme should be selected now and prioritised as a more sustainable solution. **The solution of moving abstraction points to the lower catchment of rivers should be prioritised for investigation immediately** as it offers clear, unambiguous benefits to the rivers of keeping more water in them for longer. This would be a sustainable solution across the region and if SW is proposing to do so in the future for the River Adur, why not for the Test and the Itchen?
29. A water recycling scheme is proposed near Littlehampton to transfer recycled water (up to 15ml/day) to the Pulborough area by 2031. Given the challenge of developing the plan, seeking consent, gaining approval for a pipeline through the South Downs National Park, investigating the impact of using the Wester Rother as an environmental buffer and other matters that need to be addressed, **this is a wildly optimistic plan that shows a lack of thought and proper consideration**. It should not be in the WRMP with such a short timescale for delivery.
 - The same comments would apply to the Isle of Wight proposed effluent recycling scheme at Sandown where there is additional risk of developing on a landfill in the floodplain which must be fully investigated and considered.
30. **More challenging targets should be set for delivery of both the groundwater borehole schemes and the River Test Managed Aquifer Recharge Scheme (MARS) in Hampshire.** They are within the company's control and require minimum addition infrastructure to be built. Investigation and delivery should be started in 2025 to deliver the schemes as soon as possible.
31. **The investigation of other identified, potential confined aquifer storage schemes in Hampshire & West Sussex is not being advanced to establish the yield they could provide.** This is essential to inform the decision-making process and the investigation of all these options should be prioritised (and funded) so that they can be included as feasible options.
32. Proposed schemes to recycle water currently wasted at the Otterbourne & Testwood Water Treatment Works should be prioritised more urgently to help minimise abstraction on the Test & Itchen all the time, not only in a drought (Annex 20, page 32).
33. No work is taking place to ensure the alternative Hampshire effluent recycling option using Peel Common and a bespoke environmental buffer lake are advanced as a back-up, **despite this work having been allocated funding by Ofwat**. Defra should insist that this work be done. Nor is there any reference to further investigation of a combined Portswood & Peel Common scheme, which was previously indicated to be feasible with those **sites closer to where the water is needed**. It is very concerning that SW shows no interest in progressing these options to establish which would be the best solution with least environmental impact.
34. Across the Western & Central Area **the fact that sources 'might not be available in a drought' is being used by SW as an excuse not to increase capacity at existing water treatment works.** If the works were upgraded they could be used at higher capacity during

normal operation, leaving other groundwater sources that would be available in a drought to rest or be used less, so that more groundwater is available in a drought. Schemes to increase capacity at existing works could deliver 18MI/d of water across the region and these options should be prioritised. However, SW are less likely to find this an attractive option where the source is surface water because it is cheaper to treat and supply groundwater every day. SW need to plan to use their water sources in a more sustainable way that works with climate change, not just use the cheapest sources first.

35. **Many cheaper and more sustainable schemes have been rejected by SW because they 'cannot be delivered in time'** (this is presumed to be by 2030).

- 17 schemes in Hampshire & IOW (Western Area) could deliver at least 42 MI/d.
- 7 schemes in West Sussex (Central Area) could deliver at least 18 MI/d

Yet the effluent recycling scheme in Hampshire which will supply both Hampshire and West Sussex cannot be delivered until 2035 and that timescale will almost certainly slip further, owing to the complexity of the project. SW are putting all of their effort into one really expensive option when it would be much better, more resilient and more sustainable to develop multiple smaller schemes, closer to where the water is needed, many of which do not even require new consents, just treatment plant or borehole upgrades. Defra should insist that these smaller schemes be properly assessed and expedited where possible.

36. **SW are still not urgently investigating and bringing forward new reservoir schemes in the short to medium term, despite this being the preferred choice of a majority of customers.** The delivery of a new reservoir near Henfield to store water from the River Adur project is not scheduled until 2039/40 and no other schemes are being considered in Hampshire or West Sussex. Defra should insist that SW include identification and development of more reservoir options in their plan for Hampshire and Sussex to take advantage of the forecast wetter winters.

37. No cost benefit analysis of all of the options has been provided by SW. Overall, it appears that SW have selected their preferred options based on schemes that have large amounts of infrastructure required and high cost so they can legitimately charge customers a great deal of money and thus markedly improve returns (profits). They should have taken an impartial look at all the options and progressed those that have less environmental impact, cost less and that can be implemented quite quickly.

- With the way the industry is funded customers will still be paying for these unwanted effluent recycling schemes after they have come to the end of their estimated life expectancy of 60 years. This makes no sense, especially when they leave no legacy for the community.

Defra should reject the SW plan and require them properly consider more sustainable and lower carbon solution, especially those that have multiple benefits and leave a legacy for the community.

38. **Many customers have no trust in SW's ability to provide water to the correct standard through the recycling process because of their poor track record of using traditional infrastructure as seen with WTW failures, pollution incidents and other problems.**

What certainty is there that the Company can operate the complex advanced effluent recycling treatment technology without incident. If polluted water enters the Havant Thicket Reservoir from a failure at the recycling plant it will devalue the water already there and result in further issues and concerns re water quality. **Many customers have said that they will not trust tap water should this scheme be implemented and thus turn to bottled water,** with the attendant large increase in plastic use and waste. This is just the opposite of what is required for the future.

Inadequate consultation with water users and the communities affected by the Hampshire recycling scheme

39. SW has made it very difficult to obtain detailed information and data on the options that it has looked at and **failed to be open and transparent with the public and representative organisations**. Documents critical to understanding and evaluating the options available have not been made available to the public. Instead, SW have classified the Options Appraisal and key environmental assessment reports as restricted. It seems there are more documents restricted in 2024 than there were in 2022 and many view this as a deliberate ploy to hide important information. As SW know it is unlikely that customers will be prepared to travel to their Worthing HQ to view these large reports, that cannot be properly reviewed in one visit, they can keep secret information that could be prejudicial to them pursuing their preferred option. Other water companies have made this information more accessible. Those documents that are accessible are very large and repetitive and fail to provide important information. Lacking knowledge of the water industry, most customers struggle to get to the heart of what is proposed. Again, this appears to support the view of many that SW, having fixed on a very expensive solution, does not want it derailed by informed objection. Defra should require SW to revisit its revised WRMP and, after changing it, make available documentation that will show that proper evaluation of all the options has been done.
40. Customer research across the water industry has shown a clear preference for more natural solutions such as aquifer storage, reservoirs & catchment management. SW needs to listen to their customers and not push ahead with the least favoured options of desalination and effluent recycling.
41. Lack of adequate and meaningful engagement and consultation with customers. A very significant alteration is taking place to customers' water supply and SW should be engaging proactively with all their customers to inform them and get their feedback. **SW has done the bare minimum in the local area to engage with customers.**
42. Communities in the areas affected by the selected options **did not have the opportunity to comment at the 'formative stage' of the plan**, before the new effluent recycling options were selected (see also paragraph 6). This is not acceptable.
43. At the time of previous consultations (2020 to 2022) posters were not even placed at the sites impacted to make local communities aware that a consultation was taking place. Nor have posters been placed at impacted sites for this Autumn 2024 consultation.

Additional detail on key concerns

44. As stated at paragraph 11 the draft WRMP does not strive to work with the predicted changes to our climate, where modelling forecasts has shown that we are likely to get wetter winters and drier summers. A complete re-think is required about how, where and when we take water from the environment. **A strategy is required that includes moving abstractions (river & boreholes) to the seaward end of the catchments, just above the limit of tidal reach, together with collecting more water when it rains and storing it for use in dry periods.** Instead, SW plan to leave the current abstractions where they are and 'manufacture' additional water to address the regulatory requirement to reduce impacts on the environment. **They plan to build a new chemical, energy and carbon hungry infrastructure (effluent recycling & also desalination), which must operate 24 hours a day, 365 days a year, even though it is selected and intended as a drought resource for occasional use only.** There will then be pipelines to transfer the water long distances (up to 40km for the Hampshire WR scheme), because the water is not being produced where it is needed. The huge amount of energy required and carbon generated will only add to our problems with climate change and energy insecurity. Now is the time to rethink our strategy and prioritise and invest in more sustainable solutions, not investing in infrastructure

heavy unsustainable solutions that, once selected will stop the Company investigating and bringing forward more sustainable solutions for a generation.

45. RCPC agrees that action is needed now to invest to create more robust & resilient water supplies but what is needed are more sustainable solutions that work with climate change, not against it.
- Moving river & borehole abstractions down catchment to protect the environment and restore more natural flows.
 - Developing new reservoirs & aquifer storage schemes that store more winter water for use in dry summers. We must use more of the water that falls freely from the skies.

SW say this is a once in a generation opportunity to develop more resilient supplies, but **it is necessary to make the right decisions to invest in more sustainable solutions that leave a long-term & positive legacy, not chose unsustainable solutions to 'manufacture' water**, which SW see as a quick fix that will increase their profitability but future generations will regret as they will last no more than 60 years!

46. Having failed to understand the risks of the Fawley desalination scheme, which led to its inevitable rejection, SW should not be allowed by Defra and the regulators to repeat the same mistake and put 'all of their eggs in one basket' for a scheme that involves technology new to the UK, significant environmental risks and has no guarantee of delivery. As a minimum a twin track approach on water resource development in Hampshire must be adopted for the short to medium term.
47. **SW are unnecessarily pessimistic and over precautionary in the choices they make which creates a much higher demand forecast**, which in turn helps them to justify very large infrastructure projects, from which they can make a large profit. For example;
- a) **Using even higher growth forecasts of population for the period 2025 to 2050 than in the last draft plan (page 82), even though the industry regulator Ofwat has confirmed they can use the much lower Office of National Statistics (ONS-18 at 16%) population growth**, the figures which most closely aligns with the core strategy in the Ofwat guidance (page 118)
 - b) Assuming high levels of abstraction reform when what is required is currently very uncertain as their environmental studies are ongoing. Page 118 confirms they are using high environmental destination targets, which go further than BAU+ and Environment Agency Enhanced Scenarios.
 - c) Assuming there will be no abstraction at all on the River Itchen & Rother, not even in winter when the river levels are high or in flood. Page 107 states; "We have been ambitious through our 'alternative' scenario and are investigating the solutions that would be required to **allow us to stop all abstraction in our most sensitive catchments including the River Itchen** and lower River Rother and River Arun to remove any potential risk to designated wetlands, **going beyond the required reductions just to meet flow targets**"
 - d) Using the supply forecast sequences that move to a 1-in-500-year drought resilience sequence by 2040-41. "As the choice of timing to move to 1:500 resilience is within company control, we have also explored alternative dates for achieving the 1:500 drought resilience through sensitivity analysis" (page 115)

Using these assumptions helps SW to forecast a much higher demand sooner, then they use this to help them dismiss more sustainable options on the basis they are too small to meet the demand. **The 2024 plan demand forecast should be based on more moderate predictions of population growth and abstraction reform, with the proactive**

investigation of interim more sustainable solutions to meet immediate needs in the interim. More pessimistic forecasts should only be used when they become more certain.

48. At the start SW declares that water is a precious resource and their strategy is built on four key objectives that work together to deliver a major change in water resources planning as follows:

- Efficient use of water and minimal wastage across society.
- New water sources that provide resilient and sustainable supplies.
- A network that can move water around the region.
- Catchment and nature-based solutions that improve the environment.

They have set themselves supposedly ambitious targets to reduce leakage through the supply network as well as the amount of water used in homes and businesses. However:

- a) They aim to reduce leakage by 53% by 2050, this being greater than the 50% reduction target set by the government but the reduction target both from Government and for the water companies should be much more demanding. **Millions of litres of treated potable water are lost daily and this is just not acceptable** given that customer money has been spent treating it in the first place. Much greater effort should be made to reduce this leakage down by 40% in 2040 and 70% by 2050.
 - b) They aim to reduce water use in homes in a dry year from the current 138 litres per person per day to 110 litres per person per day by 2045; five years ahead of the 2050 date set by the Government. **This really is not a stretching objective, either from the Government or the water industry.** Many of us can manage on less than 100 litres per day so the companies should get on and finish installing water metres (smart or otherwise) and at the same time execute an informative, water saving advice programme and provide tariff incentives. **If less water is used per day then less has to be found from resources.**
 - c) SW plan to reduce water for non-household use by 9% by 2038 through smart metering, water audits and collaborative working with businesses and communities. **Again, this is not a stretching target with a need for much greater effort in the first 10-year period.** More challenging targets for reductions need to be set and the programme brought forward to deliver improvements sooner. **A reduction of 25% for non-household use by 2040 would be a good starting point.**
 - d) SW has stated they will be promoting catchment and nature-based solutions through their Catchment First programme (a commitment to put the wellbeing of the environment and communities at the centre of the decisions they make and the services they deliver to improve environmental resilience). It is really important to progress this programme but **RCPC notes that delivery of the Hampshire recycling scheme is directly at odds with this statement in that the project is not catchment-based (aquifer or reservoir) and certainly will have a negative effect on the environment** owing to the large amount of energy used every day to push 30MI 40 kms to Otterbourne from the Havant reservoir. On the other hand, the Test MARS solution, and other aquifer storage schemes, should be funded and brought forward as quickly as possible.
49. SW say that climate change is expected to reduce the amount of water they can supply from some of their existing water sources and increase demand as the weather becomes warmer and drier. This means that during droughts, which are expected to become more frequent, there will not be as much water available from their existing sources. The nature of climate change for the UK is that as the atmosphere over the Atlantic warms it will absorb increasing amounts of water, it is estimated by around 7% for each degree of temperature increase. As the majority of our weather comes from the Atlantic with the prevailing winds this will mean

more and heavier periods of rain from autumn through to late spring such that the country is likely to see flooding occurring regularly and the groundwater resources being regularly replenished. **Therefore, maximum effort should go into increasing storage capacity to take advantage of rain given freely and to reduce flooding where possible.**

Conclusion

50. It makes no sense to increase resilience to a very occasional major drought by embarking on a hugely expensive infrastructure scheme to recycle water a very considerable distance away from the area in South Hampshire that needs it and thus need to build a pipe system that runs for 40km and needs to be operated every day of the year, every year, even during extended periods of wet weather, just to be sure of dealing with a possible drought in one year out of every 500. **The environmental cost of using all that energy and the unnecessary financial cost to the consumers is not justifiable in any way.** If recycled effluent really is needed in South Hampshire the necessary plant should be built much closer to where the water is needed but, **in the first instance, every attempt should be made to reduce demand, loss from leakage and increased storage of freely given rainfall.** This equally applies to other recycling schemes and is the sensible way to address potential water shortages in the future.

Note: If despite all of the objections the SW plan is to be approved then the recycling plant that is to be located near Budds Farm WWTW should find a different site to locate the plant, as the risk of developing on a contaminated landfill site immediately adjacent to Langstone Harbour are not acceptable. The existing alternative site selection report is not robust and there are more suitable lower risk sites in the area.

51. The regional planning under Water RSE has supposedly chosen those plans with best overall value. **The Hampshire WT&WR scheme does not offer best value because the benefit of dealing with a possible drought at some point in the future by having additional water supplies is overwhelmed by the sheer cost of the project not only for construction but also year on year for operation and all at the consumers' expense at a time when more people than ever are struggling to pay their bills.**
52. RCPC asks that DEFRA reject the SW draft WRMP outright as being focused on mainly delivering one hugely expensive solution for South Hampshire, instead of being a document that seriously examines all the options impartially and prioritises those that can make a difference in a manner that is affordable to consumers in an ever more challenging financial world. Defra must direct SW to start again and produce a plan that looks seriously at all the options to drive down demand, reduce wastage from leaks, achieving quicker wins by adjusting abstraction points and building new reservoirs/implementing other storage options.

Yours faithfully,



Lisa Walker
Clerk to Rowlands Castle Parish Council